

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 September 2017 11:44  
**To:** Blackcountrycorestra  
**Cc:** [REDACTED]  
**Subject:** Representations to I&O Report on behalf of Barratt Developments  
**Attachments:** JBB8353.C5577.Representations Report.Final.08.09.17.pdf;  
JBB8353.C5577.Representations Report.Final.08.09.17.docx

Dear Sir / Madam

RPS Planning & Development is instructed by Barratt Developments Plc to submit representations to the Black Country Core Strategy Review "Issues and Options" Report. Please therefore find attached a statement which provides responses to specific consultation questions posed in the Issues and Options Report. I have also attached a word version of the statement to enable you to extract the responses into your database, as necessary.

We have submitted separately a "Call for Sites" response for **land at Stencils Farm, Walsall**. This land is promoted by Barratt Developments as a sustainable and deliverable site for residential development. The Call for Sites response comprises a covering letter, completed Questionnaire and a suite of supporting technical reports.

Should you require any further information please do not hesitate to contact me.

I would be grateful if you could confirm receipt of this email.

Yours faithfully

---

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**RPS**

**Black Country Core Strategy Review:  
Issues and Options Report**

**Representations on behalf of Barratt  
Developments Plc**

**08 September 2017**



**BLACK COUNTRY CORE STRATEGY  
REVIEW:**

**ISSUES AND OPTIONS REPORT**

**REPRESENTATIONS ON BEHALF OF  
BARRATT DEVELOPMENTS PLC**

Date: 08 September 2017

**Our Ref:** **JBB8353.C5577**

**RPS Planning & Development**

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# QUALITY MANAGEMENT

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Prepared by:	[REDACTED]
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Date:	<b>08 September 2017</b>
Project Number/Document Reference:	<b>JBB8353.C5577</b>

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# 1 INTRODUCTION

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- 1.1 RPS Planning & Development (RPS) is instructed by Barratt Developments Plc (Barratt) to formally respond to the Black Country Core Strategy (BCCS) Review *“Issues and Options Report”* (July 2017) (IOR).
- 1.2 Barratt supports the decision of the four authorities to commence a review of the BCCS. As acknowledged in the IOR, the BCCS is now six years old and there is an urgent need for review to provide an up-to-date strategic development plan to identify and deliver growth requirements across the Black Country in the period to 2036. Barratt intend to take an active role in the BCCS Review process.
- 1.3 The representations are made in the context of Barratt’s interest in **land at Stencils Farm, Walsall**. This land is promoted as a sustainable and deliverable site for residential development through the *“Call for Sites”* process, which has ran concurrently with the IOR consultation. Barratt’s Call for Sites response has been submitted separately and comprises a covering letter, completed Questionnaire and a suite of supporting technical reports which includes a *“Development Framework Plan”* providing an indication of the site’s development capacity; c.570 dwellings set within 18ha of green infrastructure.
- 1.4 Following the Council’s consideration of these representations, Barratt would welcome the opportunity to meet with Officers of Walsall Council to present and discuss the emerging proposals for the land at Stencils Farm.

## **Statement Structure**

- 1.5 This Statement is structured to provide a specific response to relevant Questions posed within the Council’s IOR. Sections 2 to 15 respond to Questions 1-3, 5, 7-9, 11a, 12a, 12b, 13a, 13c, 13d and 15a.

## **Contact Details**

- 1.6 Should any further information be required please contact:

  
Associate Director  


## 2 QUESTION 1 – PARTIAL REVIEW

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### ***Q1 – Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies?***

- 2.1 Barratt supports the decision of the four authorities to commence a review of the BCCS. The BCCS is now six years old, pre-dating both the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), and sought to deliver growth targets based upon historic and outdated evidence, in particular the revoked West Midlands Regional Spatial Strategy (WMRSS) Phase Two Revision Panel Report. As acknowledged in the IOR, it is necessary to review the BCCS to provide an up-to-date strategic development plan to identify and deliver growth requirements across the Black Country in the period to 2036. Barratt intend to take an active role in the BCCS Review process.
- 2.2 Para. 1.6 of the IOR states that the BCCS “...will generally remain fit for purpose” and that it is “...proposed to carry out a partial review of the existing Core Strategy ... rather than carry out a wholesale review”. Para. 3.61 states that a “selective” review is needed.
- 2.3 We recognise that many of the detailed “development management” type policies may be appropriate to carry forward as part of the BCCS Review. However, everything else in the adopted BCCS will need to be reviewed, particularly as strategic matters need to be revisited, namely; housing and employment need/requirements, spatial distribution strategy and land supply, with the latter inevitably requiring Green Belt releases based upon the scale of housing and employment need (IOR para. 3.17). The scale of the housing need is such that Green Belt releases will need to be delivered through strategic allocations within the BCCS Review rather than deferred to lower order development plan documents.
- 2.4 We highlight that the Inspectors appointed to review the BCCS were supportive of the “commitment to a *full* review” of the BCCS, rather than a partial review (emphasis added) (para. 236 of their Report, October 2010).
- 2.5 The scale of housing and employment growth identified in the IOR over the proposed plan period is significantly greater than that planned for in the BCCS and represents a step change on past rates of completion. The IOR acknowledges that the urban areas will not be capable of accommodating all of this growth. The spatial strategy in the BCCS review will therefore have to be fundamentally different to that within the adopted BCCS, so we consider it misleading to state that the existing spatial strategy will be “stretched”. The growth requirements amount to an exceptional circumstance to justify the release of Green Belt land so this will have to form part of the new spatial strategy. Such releases were not necessary in the adopted BCCS, so it is important that the review acknowledges that the spatial strategy will be fundamentally different, rather than simply “stretched”.
- 2.6 One could infer from the references to retaining and stretching the spatial strategy (para. 1.6), and “urban regeneration” (para. 1.19) remaining the focus, that the authorities have already agreed upon the spatial strategy. However, the spatial strategy forms part of the review and Questions 10 and 11 of the IOR seek views on strategic distribution options. It is therefore critical that the authorities do not commence the review process with a closed mind and predetermined

spatial strategy. Rather, we urge the authorities to consider and assess all potential spatial options before settling upon a preferred option.

- 2.7 In summary, we consider references to a “*partial*” and “*selective*” review, and “*stretching*” the existing spatial strategy, to be wholly misleading. It should be acknowledged that an extensive review is required which will have to revisit the fundamental and strategic objectives/policies of the adopted BCCS.
- 2.8 The IOR does not include a question on the proposed plan period but we wish to record support for the 2014-36 timeframe (para. 1.17). 2014 aligns with the base date of the most up-to-date Household Projections and the end date provides a 15 year period from the envisaged date of adoption of the BCCS Review (2021).
- 2.9 We recognise that the preparation and examination of a joint development plan takes a considerable amount of work and agreement but we would urge the authorities to advance the review process as swiftly as possible. The authorities have acknowledged that the need for a review is urgent (para. 1.4 of the IOR) although adoption is not anticipated until Autumn 2021, with a five year review process when considering that it commenced in 2016. This would mean that the BCCS review will not be adopted until a decade after the BCCS, and will result in delays to the delivery of strategic allocations.
- 2.10 It is important that the identified development needs of the Black Country and wider Housing Market Area (HMA) are met as quickly as possible so we urge the authorities to progress the review as swiftly as possible, and to ensure that strategic allocations are delivered through the BCCS review rather than lower order development plan documents.



### 3 QUESTION 2 – EVIDENCE BASE

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

- 3.1 Paragraph 159 of the NPPF advises that plan makers should have a clear understanding of housing needs in their area through the preparation of a Strategic Housing Market Assessment (SHMA). It requires a SHMA to identify the scale, mix and tenures of housing that the population is likely to need over the plan period. The Black Country and South Staffordshire SHMA (March 2017) has been prepared to address this national policy requirement, and provides a critical piece of evidence for the BCCS review.
- 3.2 RPS has considerable experience when considering objectively assessed housing need (OAN) having participated in numerous local plan examinations on this matter. We provide detailed comments on the SHMA in response to Question 3 but wish to highlight here that it is critical that the SHMA is refreshed at appropriate points during the review process (potentially to 2021) to ensure it remains valid. In particular, we wish to highlight that:
- New 2016-based Household Projections are programmed for release in summer 2018, and further releases are likely if the review programme extends to 2020/21; and
  - The DCLG has pledged to revise the way in which housing need is calculated, as noted in the Housing White Paper (February 2017). Its standard methodology for calculating OAN is expected to be published for consultation during September 2017 and it is likely that the review will need to reflect this.
- 3.3 The 2017 SHMA must not therefore be viewed as a settled document but, rather, will need to be refreshed at appropriate points to reflect new and up-to-date policy, guidance and evidence.
- 3.4 As stated in our response to Question 5, we support the need for a Green Belt Review to be commissioned and completed during 2018. The scale of housing need and existing supply position provides an exceptional circumstance to justify Green Belt land release.

## 4 QUESTION 3 – HOUSING NEED AND SUPPLY

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***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?***

### **Housing Need**

- 4.1 The IOR states that the Objectively Assessed Need for Housing (OAN) for the Black Country Housing Market Assessment (HMA) is 78,190 dwellings across the period 2014-2036. To inform this calculation, the authorities have undertaken an updated Strategic Housing Market Assessment (SHMA) (March 2017). In addition to the four Black Country authorities, the SHMA also covers the future housing need for South Staffordshire.
- 4.2 RPS has reviewed the SHMA in detail and questions whether a fair or proportionate approach has been adopted in deriving this figure. We consider that further adjustments are necessary in order to present a sound OAN that is capable of withstanding scrutiny through the Examination.
- 4.3 It is also recognised that the Government is intent on reforming the current approach for calculating housing need and, as a consequence, a consultation methodology is likely to be published in September 2017. These representations are made without the benefit of viewing the consultation methodology although they do reflect on what may be included.
- 4.4 In summary, RPS considers that the OAN for the Black Country is insufficient and needs to be increased. **RPS has taken into account more robust assumptions than relied upon in the 2017 SHMA, arriving at an OAN of 85,930, or 3,906dpa which is considered a more appropriate figure.** This is 9.9% higher than the Councils' calculation and should be accounted for to ensure that the Councils are planning for the correct level of growth.
- 4.5 In addition to the Councils' own OAN, RPS considers that more needs to be done in order to establish the housing requirement for the plan period. Whilst the OAN informs what is necessary to meet the forecast housing need, the requirement can be higher to take account of policy factors such as economic growth aspirations and unmet need from across the wider HMA. A testing provision of an additional 3,000 dwellings is proposed within the IOR, as a contribution towards the unmet needs Birmingham.
- 4.6 The evidence supporting RPS' approach to OAN including a wider critique of the Councils approach is detailed under the various headings below.

### ***Demographic Starting Point***

- 4.7 Although the Planning Practice Guidance (PPG) recognises that there is no single approach to calculating OAN, it is recognised that the starting point should be the projections published by ONS which, presently, are updated biennially. The latest forecast published comprise the 2014-based Sub-national Population Projections (2014 SNPP) and the 2014-based Sub-national Household Projections (2014 SNHP). These projections will remain up-to-date until summer 2018, when ONS will publish the 2016-based projections.

4.8 The 2017 SHMA has utilised the 2014-based projections to establish the demographic starting point, which is the correct approach to take. Framed against the proposed plan period 2014-2036, the 2014 SNPP indicate that there will be a growth of 73,572 dwellings across the HMA. These are the unadjusted figures which the Councils rely upon by the 2017 SHMA.

4.9 In order to convert these from households into dwellings, it is necessary to apply a conversion factor, which accounts for second homes and vacant homes that exist in the dwelling stock. This information is not clearly presented in the 2017 SHMA. However, RPS has calculated the conversion factor taken from the latest data available<sup>1</sup>. As illustrated in Table 4.1, applying this factor presents a total dwelling growth of 80,066 dwellings for the five authorities.

**Table 4.1: SNHP 2014 Baseline Growth Projections**

	Growth 2014- 2036	Vacancy Rate	Second Home Rate	Conversion Factor	Dwellings
Dudley	11,727	2.5%	0.2%	2.7%	12,044
Sandwell	29,088	2.5%	0.0%	2.5%	29,815
Walsall	17,544	2.2%	0.2%	2.4%	17,962
Wolverhampton	15,213	2.9%	0.3%	3.2%	15,695
South Staffordshire	4,437	2.3%	0.3%	2.6%	4,550
<b>Total</b>	<b>78,009</b>				<b>80,066</b>

4.10 The 2017 SHMA includes a baseline dwelling increase of 80,055 across the five planning authorities. This is only 11 dwellings different from the figures in Table 4.1, so provides a good sense check against the baseline projections.

4.11 Although not currently modelled by RPS, it is recommended that the demographic forecasts are updated to reflect subsequent Mid-Year Population Estimates (MYEs) provided by ONS, which may differ from the baseline projections. In terms of the current data available, the 2015 and 2016 MYEs have been published and should be factored into the assessment of OAN as part of future iterations of the SHMA.

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<sup>1</sup> Vacancy - 'all vacants' DCLG Table 612 (2016)  
Shared Homes - Council Tax Base January 2017

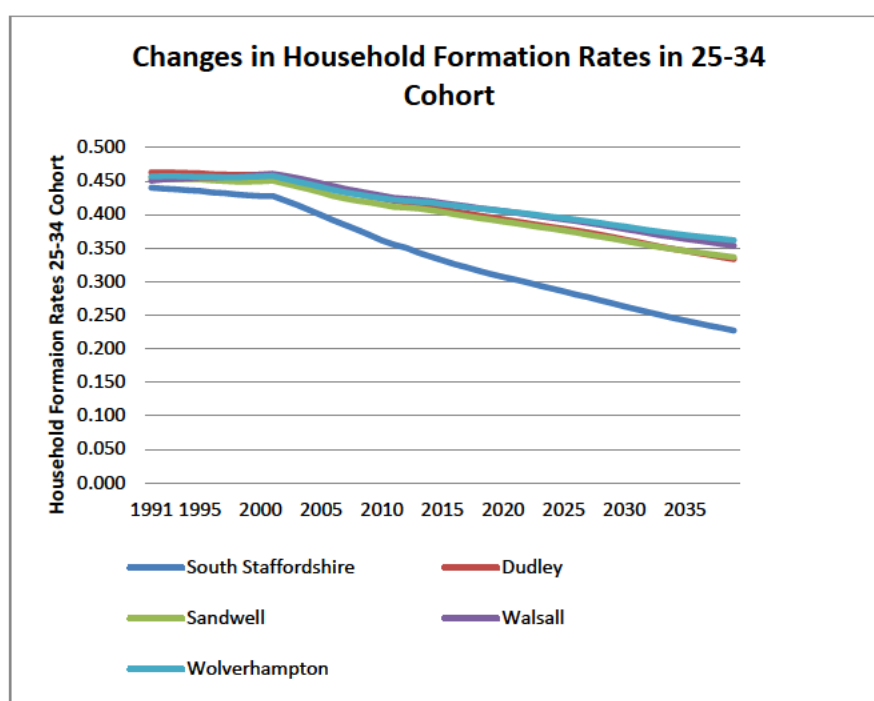
## Demographic Adjustments

- 4.12 The PPG recognises that the population and household projections prepared by ONS are trend based, resulting from past changes in local demography. The PPG advises that the household projections may need to be adjusted to reflect factors not captured in past trends. This can be explored through the consideration of the components of the population projections, in relation to longer term trends and an assessment of household formation rates, which may have been constrained by a shortage of housing supply. The 2017 SHMA's approach to both of these issues is set out below.

### Household Formation Rates

- 4.13 The 2017 SHMA takes a cursory view of Household Formation Rates (HFRs), presenting the latest 2014-based projections in relation to how these are expected to change over the plan period. The 2017 SHMA indicates (paragraph 4.33/4.34 refers) that the evidence does not suggest rates have been suppressed by a lack of supply, pointing instead to a lack of viability in the market to build new homes which young adults can access. RPS questions whether this is a robust assumption, and the assertion in the 2017 SHMA (paragraph 4.49) that HFRs in younger age cohorts are performing well. No evidence has been provided to consider past formation rates as part of the assessment, which is not consistent with the aims of the PPG.
- 4.14 Turning to the previous treatment of HFRs, RPS has considered these against the younger age cohorts in particular, to consider whether there has been any departures from trend. Figure 4.2 considers the formation rates for the 25-34 age cohort across the HMA. This indicates that across the board for this age group, the formation rates have significantly decreased from around the year 2000, and the projections have embedded this reduction into the forecasting years ahead.

Figure 4.2: 2014-based Household Formation Rates for Black Country and South Staffordshire



- 4.15 RPS considers that adjustments to HFRs for this age cohort are necessary and have been overlooked by the 2017 SHMA. In response to this, we propose that the 2017 SHMA should be amended to uplift the HFRs in the 25-34 age cohort to robustly capture any shortcomings of the household projections.
- 4.16 This departure from trend is consistent with the research of McDonald and Williams, who noted this in their 2014 report on behalf of the RTPI<sup>2</sup> when they drew on evidence indicating that a major change to formation rates since 2001 has been the trend for young adults living in either the parental home or in shared accommodation, led in part to issues linked to housing shortage and affordability during the economic downturn.
- 4.17 We consider that there is compelling evidence to uplift the HFRs. Although this has not been modelled by RPS, this adjustment should be made as part of a future SHMA and for the purposes of this assessment, the OAN is presented as a minimum figure as it is expected that the actual OAN will be higher once this factor is accounted for.

#### ***Accounting for Past Delivery***

- 4.18 The 2017 SHMA recognises the need for consistency throughout the wider HMA, recognising that the BCCS review sits in the context of the wider Greater Birmingham HMA.
- 4.19 The 2017 SHMA draws on the Strategic Housing Needs Study (SHNS) which identified the housing need in the wider HMA from 2011 onwards. The 2017 SHMA has taken the view that completions from 2011 up to the start of the Plan period (2014) should be considered against the projections in the SHNS to consider whether there have been any shortfalls in delivery. In total, a gap of 2,689 dwellings is identified (table 4.6 of the 2017 SHMA refers) across this three year period. This is added to the Councils' demographic starting point. This is considered a reasonable action to take, which is presented in Table 4.3:

Table 4.3: Accounting for Shortfalls in Delivery 2011-2014

	Demographic Starting Point	SHNS Shortfall	Total
Dudley	12,044	125	12,169
Sandwell	29,815	2,047	31,862
Walsall	17,962	516	18,478
Wolverhampton	15,695	-85	15,610
South Staffordshire	4,550	86	4,636
<b>Total</b>	<b>80,066</b>	<b>2,689</b>	<b>82,755</b>

<sup>2</sup> McDonald, N and Williams, P (2014) Planning for housing in England: Understanding recent changes in household formation rates and their implications for planning for housing in England. RTPI Research Report No.1

### **Market Signals**

4.20 Section 5 of the 2017 SHMA reviews information associated with market signals in the Black Country, taking the view that the housing market in the HMA is relatively stable and other than South Staffordshire, there is no need for further adjustment to the OAN (paragraph 5.69 refers). RPS questions this conclusion and considers that the relationship of affordability pressures in the District warrant the need for further uplifts.

4.21 One approach to consider market signals across the HMA would be to apply the methodology recommended by the Local Plans Expert Group (LPEG) report to Government. The LPEG recommendations propose a methodology for the consideration of market signals, based on two indicators; median quartile housing affordability and lower quartile rental affordability. The LPEG recommendations indicates four brackets of potential market signals uplift ranging from 0% to 25% depending on the severity of affordability issues, which are replicated below:

- House Price Ratio less than 5.3 and Rental Affordability less than 25% = No uplift
- House Price Ratio at 5.3 - 6.9 and/or Rental Affordability between 25% - 29% = 10% uplift
- House Price Ratio at 7.0 – 8.6 and/or Rental Affordability between 30% - 34% = 20% uplift
- House Price Ratio at 8.7+ and/or Rental Affordability is +35%= 25% uplift

4.22 In terms of the median quartile House Price Ratio (HPR), the latest data published for 2016 has been published by ONS. ONS has provided two data sets for median affordability, based on “workplace” and “residence” based earnings. The residence based dataset is considered a more appropriate dataset to use, which aligns with the historical projections provided by DCLG. In terms of rental prices, this can be calculated using lower quartile wages taken from ONS data, aligned with monthly rental data from the Valuation Office Agency (VOA), which provides a Rental Affordability Ratio (RAR). This information for the Black Country Authorities is captured below:

Table 4.4: Market Signals Uplifts in Black Country and South Staffordshire

	HPR	RAR	Uplift
<b>South Staffordshire</b>	7.67	31%	20%
<b>Dudley</b>	5.35	24%	10%
<b>Sandwell</b>	7.56	26%	10%
<b>Walsall</b>	5.39	25%	10%
<b>Wolverhampton</b>	5.31	24%	10%

4.23 Using the LPEG methodology, this suggests that 10% increases to the demographic baseline are necessary (and an uplift of 20% should be attributed to South Staffordshire where the market signal pressures are more acute). The figures suggest that Sandwell could also be qualified as a

20% market signals authority, though a conservative approach has been adopted at this stage of assessment.

- 4.24 Relating this data to the LPEG methodology, it is clear that market signals cannot simply be discounted for the Black Country and there is a need to ensure that there are appropriate increases to the OAN to reflect the balance between the supply and demand for housing. It is therefore proposed to apply the LPEG methodology to capture affordability related market signals in the Black Country area.

Table 4.5: Market Signals Uplift

	Demographic OAN Shortfall	Uplift +	Market Signals Adjusted OAN
<b>Dudley</b>	12,169	10%	13,385
<b>Sandwell</b>	31,862	10%	35,048
<b>Walsall</b>	18,478	10%	20,325
<b>Wolverhampton</b>	15,610	10%	17,171
<b>South Staffordshire</b>	4,636	20%	5,563
<b>Total</b>	<b>82,755</b>		<b>91,494</b>

#### ***Accounting for Employment Growth***

- 4.25 The SHMA has only taken a cursory review of employment data, relying on a single post-brexit forecast as part of the assessment to whether the future population balances the forecast growth in jobs. Additionally, we consider that the SHMA needs to give greater consideration to what can realistically be expected in terms of future economic activity rates, as this will impact on the translation of workplace job forecasts when considering the future availability of working age population. RPS would expect that this matter is more fully developed as part of a subsequent update.

#### ***Summary of OAN for Black Country and South Staffordshire***

- 4.26 Taking into account the above steps, RPS' initial review of the OAN in the Black Country is presented in Table 4.6:

Table 4.6: Summary of Necessary Steps to Identify OAN for Black Country and South Staffordshire

	Household Change 2014-2036	Dwelling Change 2014-2036	Unmet Need from SHNS	Household Formation Rate Adjustment	Market Signals Uplift
<b>Dudley</b>	11,727	12,044	12,169	TBC	13,385
<b>Sandwell</b>	29,088	29,815	31,862	TBC	35,048
<b>Walsall</b>	17,544	17,962	18,478	TBC	20,325
<b>Wolverhampton</b>	15,213	15,695	15,610	TBC	17,171
<b>South Staffordshire</b>	4,437	4,550	4,636	TBC	5,563
<b>Total</b>	<b>78,009</b>	<b>80,066</b>	<b>82,755</b>	<b>TBC</b>	<b>91,494</b>

4.27 Not accounting for growth in South Staffordshire, the above table indicates that the **minimum OAN for the Black Country is 85,930 dwellings**. This figure is 7,740 dwellings higher than the Council's proposed figure of 78,190, and has yet to account for the necessary uplifts to account for HFR suppression.

4.28 The RPS figure of "policy off" OAN is significantly higher than that presented in the 2017 SHMA. The adjustments made to reach the figure of 85,930 are not unreasonable and grounded in a robust set of assumptions. RPS therefore recommends that Black Country authorities consider the implications of these findings from an early stage, to ensure that the strategy for identifying sites is clear from the outset and delivers the level of growth that is required.

### ***Housing Requirement***

#### *"Policy on" Employment Growth*

4.29 The NPPF requires that authorities plan to meet their OAN in full, accounting for both market and affordable housing. In addition, the NPPF requires authorities to work together to work collaboratively to deliver sustainable economic growth, delivered through Local Enterprise Partnerships (LEPs).

4.30 Beyond the OAN, the Black Country authorities should give consideration to how the BCCS Review can be used to support economic growth and the aims of the Black Country LEP (BCLEP) and West Midlands Combined Authority (WMCA) Strategic Economic Plan (SEP).

4.31 As part of Appendix B to the 2017 SHMA, a "Policy On" approach has been tested which seeks to translate the aspirations of the LEP to increase the number of jobs in the WMCA by 600,000 by 2030. The 2017 SHMA has translated this into the Black Country through the consideration of 80,000 jobs across the plan period.



4.32 RPS highlights that the Draft Black Country Strategic Economic Plan (SEP), which was published in May 2017, identifies a job growth of 103,000 additional jobs in the Black Country up to 2030. In terms of testing a “Policy On” scenario, future iterations of the SHMA should consider the implications of this more recently published figure which is specific to the Black Country.

*Unmet Need from Outside the HMA*

4.33 The Duty to Cooperate (DtC) places a legal mandate on local authorities to work together to address strategic cross-boundary issues through the local plan process. There is a clear and significant unmet need arising from the Birmingham Development Plan, which against a target of 89,000 dwellings, has a shortfall of 38,000 dwellings.

4.34 The GBSLEP has coordinated a number of Joint Strategic Housing Needs Studies (JSHNS) to consider where shortfalls arising from Birmingham could be met, taking into account the functional relationship to the City and the ability to accommodate further housing need. Presently three studies have been prepared, the latest dated August 2015 and a further “Stage 4” study has been commissioned (entitled “Greater Birmingham and Black Country HMA Strategic Growth/Locations Study”) which is expected to be published during autumn 2017.

4.35 As a response to the shortfalls arising from Birmingham, the IOR indicates that it will test whether 3,000 dwellings can be accommodated within the Black Country up to 2031 (following the Birmingham Local Plan timeframes) to contribute towards the shortfall in the wider HMA. RPS welcomes the authorities proactive stance towards accommodating cross-boundary needs particularly given that the Black Country shares clear functional relationships with Birmingham in terms of migration and commuting. It is, however, unclear how the 3,000 contribution has been arrived at and we request that the rationale behind this level of provision be explained.

**Housing Supply**

4.36 The Housing Supply Background Report (HSBP) (July 2017) summarises potential sources of housing supply across the Black Country. Completions since 2014 amount to 5,678 dwellings (2,839 per annum). Potential supply for the period 2016-36 from commitments and windfall sites included within the adopted/emerging development plan documents and four SHLAAs amounts to 45,416 dwellings. Finally, potential additional supply from both small and large windfall sites and from increased densities amounts to 5,426 dwellings. The total potential supply is therefore stated as 56,520 dwellings.

4.37 It is apparent that windfalls make up a significant portion of the identified supply; it is not possible to confirm the figure using the HSBP although the IOR states that the figure is 8,335 (Figure 6) equating to 15% of the identified supply. Relying on such a large windfall allowance attracts significant risks in relation to housing delivery because it relies upon a considerable number of unidentified sites coming forward, despite the fact that the SHLAAs will have already investigated the potential for large windfall sites. It is considered that the SHLAAs will have to be refreshed as part of the BCCS Review to provide a more definitive position on potential housing supply within the urban areas. Updates to the HSBP should also provide a clear breakdown of the supply categories for each authority for transparency; this will be critical in assessing the deliverable/developable housing supply.

4.38 Even when allowing for such a huge windfall allowance, the overall supply position is stark in the context of the emerging housing need; there is a shortfall of almost 22,000 dwellings against the

2017 SHMA OAN, which means that 28% of the Black Country's housing need to 2036 is currently unaccounted for. This shortfall would be even more pronounced against the OAN figure presented by RPS; 29,410 dwellings (34% of the need). Furthermore, this shortfall disregards the 3,000 dwellings which the authorities have committed to test as a contribution to Birmingham's unmet needs.

4.39 To put these shortfall figures into context, they equate to a need for 629 – 840ha of net developable housing land over and above all of the currently identified supply (assuming a net density of 35 dwellings per hectare as applied in the HSBP). Obviously, the gross land requirement would be even greater. It is therefore clear that significant Green Belt releases will be required.

### **Employment Land Release**

4.40 Para. 3.16 of the IOR alludes to the potential release of additional surplus employment land for housing during the final decade of the proposed plan period (2026-36). A “*maximum*” figure of 10,400 dwellings is stated from this potential source, and whilst this has not been included within Figure 6 of the IOR as a potential source of supply, we urge caution in making assumptions around such additional employment land releases for the following reasons:

- The figure of 10,400 is crudely calculated on the basis of projecting forward the 300ha of employment land planned to be released between 2016 and 2026 and then applying a residential density of 35dph. This is a simplistic method of calculation which is not founded upon a robust evidence base on the need for employment land and the potential quantum of surplus employment land which is potentially suitable for residential development;
- The Economic Development Needs Assessment (May 2017) (EDNA) recommends that the review plans for the provision of up to 800ha of additional employment land to meet needs, with a “gap” of upto 300ha (IOR para. 3.27). This is obviously a huge requirement and appears to be in direct conflict with the suggestion that up to 600ha of existing surplus employment land will be released over the plan period; and
- The potential supply figures in Figure 6 of the IOR already provide a considerable windfall allowance which will inevitably include redevelopment of surplus employment sites, so seeking to add in a further employment land supply runs the risk of double-counting.

4.41 In summary, any potential for further release of surplus employment land beyond 2026 must be quantified based upon a robust evidence base which has regard to the need for employment land over the plan period. Such evidence must be aligned to the SHLAAs to ensure that each provides a thorough assessment of the supply from potentially surplus employment sites identified through the EDNA. The EDNA suggests that there will be a significant need for additional employment land to be allocated which flies in the face of the suggestion at para 3.16 of the IOR that further employment land could help to “*close the gap*” in the housing supply.

### **Conclusions on Overall Housing Supply**

4.42 To conclude, the authorities are facing a considerable challenge in meeting their own housing needs, let alone any contribution towards the unmet needs of Birmingham. The authorities have identified potential supply within the urban areas which demonstrates a significant shortfall. The scale of the shortfall is huge – equating to approximately a third of the need – even when

allowing for a large unidentified and speculative supply in the form of windfall sites. The authorities must therefore acknowledge that a fundamentally different spatial strategy is required compared to that enshrined in the BCCS.

4.43 With respect to para. 1.39 of the Housing White Paper (February 2017), it is evident that the authorities have fully examined all other reasonable options for meeting their identified housing requirements and, as such, the shortfall must be acknowledged as an “*exceptional circumstance*” (NPPF para. 83). This justifies the alteration of the Black Country’s Green Belt boundaries to allow land to be released (through a Green Belt Review) to accommodate sustainable housing development beyond the urban areas. Such releases and allocations must be delivered through the strategic plan rather than deferred to lower order development plan documents. We explore these issues in greater detail in response to Questions 5, 7, 8, 9, 11, 12 and 13.

4.44 Once the housing supply has been identified, the authorities ought to consider a contingency allowance (circa 20% uplift) to provide sufficient flexibility in responding to changing circumstances and in recognition that the housing requirement is a minimum, rather than maximum, figure.

***Position relative to individual authority areas***

4.45 The HSBP indicates that only Dudley has a supply which is capable of meeting its own needs (an excess of c.3,400 dwellings). This overprovision could therefore help to address shortfalls across the three other authorities, or Birmingham.

4.46 The most pronounced shortfall is within Sandwell; 13,500 dwellings. This Borough is almost entirely built-up with minimal opportunities to accommodate the shortfall through Green Belt releases. It is therefore likely that its unmet needs will need to be delivered in adjoining authority areas.

4.47 Wolverhampton is projected to have a current shortfall of c.3,300 dwellings. There are areas of Green Belt land around the peripheries of the City which could potentially accommodate this shortfall.

4.48 Finally, Walsall has an OAN of c.18,500 but an identified supply of only c.10,200 dwellings, resulting in a shortfall of c.8,200. This represents the second highest shortfall of the four authorities (if RPS’ OAN figure (above) were to be applied this shortfall would increase to 10,000 dwellings). Walsall is unique in the Black Country context insofar as it encompasses an extensive area of Green Belt which lies in-between Walsall, Birmingham, Aldridge and Brownhills. It is understood that this amounts to c.70% of the Green Belt within the Black Country as a whole. Whilst not all of this will be suitable for release and development it should be recognised that Walsall has a significant area of undeveloped Green Belt land which provides an opportunity to accommodate its own shortfall (and potentially others) through selected Green Belt releases to permit sustainable urban extensions within the heart of the West Midlands conurbation, and in close proximity to Birmingham (which has the largest shortfall of all the authorities).

## 5 QUESTION 5 – GREEN BELT REVIEW

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### ***Q5 – Do you agree with the proposed approach to the Black Country Green Belt Review?***

- 5.1 As explained in our response to Question 3, there can be no question of the need for a Green Belt Review across the Black Country given the identified scale of growth and current shortfalls in land supply within the urban areas (for both housing and employment). The housing shortfall from Birmingham only reinforces this need. Similar Green Belt reviews are/have taken place across the West Midlands including Bromsgrove, Solihull and Lichfield (releases are currently proposed in the latter two).
- 5.2 The scale of the potential shortfall is a matter of regional significance and the Green Belt Review must be addressed through the BCCS review, in order to formulate an appropriate spatial strategy to accommodate sustainable growth and identify the most appropriate sites for release from the Green Belt. We therefore welcome the recognition in the IOR at para. 3.42 of the need to identify sites on land outside of the urban area and that *“nearly all such land is currently Green Belt”*. However, the IOR does not explicitly acknowledge that *“exceptional circumstances”* exist. We urge the authorities to accept this position and move forward proactively with a Green Belt Review as swiftly as possible and in a manner which provides a comprehensive and consistent assessment of the potential for sustainable land releases across the Black Country (and beyond), and which allows appropriate releases to be delivered through the BCCS review (as opposed to lower order development plan documents).
- 5.3 We recognise that the Greater Birmingham Strategic Growth/Locations (“Stage 4”) Study includes a strategic Green Belt Review and this will inform the BCCS Green Belt Review. We understand that this will be strategic in scope and will not be subject to consultation, nor formally endorsed by each of the councils within the HMA. As such, we request that the Black Country Green Belt Review be subjected to consultation, prior to its finalisation/adoption and prior to the Preferred Option stage.
- 5.4 As stated in response to Question 3, Walsall is unique in the Black Country context insofar as it encompasses an extensive area of Green Belt which lies in-between Walsall, Birmingham, Aldridge and Brownhills. It is understood that this amounts to c.70% of the Green Belt within the Black Country as a whole. Whilst not all of this will be suitable for release the Green Belt Review must recognise that Walsall has a significant area of undeveloped Green Belt land which provides an opportunity to accommodate the authority’s own shortfall and, potentially, that of others through selected releases to permit sustainable urban extensions within the heart of the West Midlands conurbation, and in close proximity to Birmingham (which has the largest shortfall of all the authorities). Walsall should therefore be a key focus of the Green Belt Review.
- 5.5 We attach as **Appendix 1** an assessment of the strategic Green Belt sites in Walsall which have been promoted through previous rounds of development plan consultation for residential development. This has been completed by FPCR on behalf of Barratt and provides an evidence base which should be taken into account as part of the Green Belt Review.

## 6 QUESTION 7 – VISION AND SUSTAINABILITY PRINCIPLES

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***Q7 – Do you think that the Core Strategy vision and sustainability principles remain appropriate?***

- 6.1 The Vision reflects the three dimensions of sustainable development within the NPPF and is therefore considered to be broadly appropriate. However, we would suggest that the first “*major direction of change*” – Sustainable Communities – should include reference to the delivery of sustainable urban extensions in the Green Belt, as it is currently focused upon “*regeneration*” (which we recognise will continue to be important).
- 6.2 Turning to the Sustainability Principles, these need to be amended to:
- Reflect the need for sustainable Green Belt releases. Number 4 includes a “*brownfield first*” principle which is inconsistent with national planning policy. It is recognised that national policy requires Councils to re-use previously developed land (PDL) but the BCCS Review should not be prioritising brownfield first. Furthermore, there needs to be recognition that significant Green Belt releases are necessary to meet the growth requirements. The scale of housing need is such that greenfield land will have to be delivered alongside brownfield land;
  - Principle 5 proposes a comprehensive approach which remains appropriate but the references to Site Allocation Documents and AAPs documents as the “*preferred mechanism*” for “*areas of large-scale change*” needs to be updated to reflect the need for strategic Green Belt releases and allocations to be delivered through the BCCS Review, rather than deferred and delayed to other development plan documents; and
  - Update the text at para. 2.4 as growth is unlikely to be concentrated within Strategic Centres and approximately a third of the housing requirement will need to be delivered on greenfield sites within the Green Belt.

## 7 QUESTION 8 – SPATIAL OBJECTIVES

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### ***Q8 – Do you think that the Core Strategy spatial objectives remain appropriate?***

- 7.1 We agree with IOR para. 4.7; the Spatial Objectives provide a “*sound basis*” for the BCCS Review but some will inevitably need to be amended to reflect the new evidence base. In particular, the housing shortfall amounts to an “*exceptional circumstance*” to justify the release of land from the Green Belt and, based upon the Councils’ own data, approximately a third of the housing requirement may need to be delivered from such releases, so this must be reflected in the Spatial Objectives.
- 7.2 The IOR (para. 3.18) states that the authorities have committed to “*test*” the accommodation of 3,000 homes to help address the shortfall from across the wider HMA. Any such provision will need to be reflected in the Spatial Objectives.

## 8 QUESTION 9 – STRATEGIC POLICIES

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***Q9 – Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network?***

- 8.1 Policies CSP1 and CSP2 will need to be comprehensively rewritten to reflect the significant change in circumstances, principally the major shortfall in housing and employment land in the urban areas and the resultant need to introduce a fundamentally different spatial strategy which provides for a significant portion of new development to be delivered through Green Belt releases.
- 8.2 As outlined in our response to Question 8, based upon the Councils' own data, approximately a third of the housing requirement may need to be delivered through Green Belt releases, so this will need to be reflected in the strategic policies. Indeed, it is likely that there will need to be a specific strategic policy addressing the release of Green Belt land.

## 9 QUESTION 11A – SPATIAL STRATEGY

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### *Q11a – Do you support Strategic Option 1A or 1B?*

- 9.1 Para. 4.14 of the IOR states that the main variable between Options 1A and 1B is the availability of employment land within the Growth Network. The authorities are proposing to retain the Growth Network as the focus in meeting the “majority” of the development needs (para. 4.11).
- 9.2 Our response to Question 3 explains that any potential for further release of surplus employment land beyond 2026 must be quantified based upon a robust evidence base which has regard to the need for employment land over the plan period. Such evidence must be aligned to the SHLAAs to ensure that each provides a thorough assessment of the supply from potentially surplus employment sites identified through the EDNA. Significantly, the EDNA suggests that there will be a significant need for additional employment land to be allocated which flies in the face of the suggestion at para 3.16 of the IOR that further employment land could help to “close the gap” in the housing supply. In relation to the figure of 10,400 dwellings being released from additional employment land releases between 2026 and 2036 (Figure 9), please refer to our response to Question 3 which identifies significant concerns with the assumptions underpinning this figure.
- 9.3 Having regard to the above, we consider that Option 1A will need to form the basis of “Stage 1” unless a robust evidence base can be produced, which differs from the existing EDNA and SHLAAs, to demonstrate that there is additional surplus employment land within the urban areas which is deliverable/developable for housing.
- 9.4 Either way, it is inevitable that significant Green Belt land release will be required to meet the housing shortfall, rather than “some” as stated in IOR para. 4.14.
- 9.5 The IOR asserts that Option 1B “...may allow more housing need to be met within the Black Country” (para. 4.18 and reiterated in the table on page 40). No explanation is provided for this statement and it is unclear why releasing additional employment land will have the effect of increasing housing supply compared to Option 1A. As acknowledged in the IOR, further Green Belt releases would be needed to offset the loss of existing employment land (para. 4.19) but under 1A this could be developed for housing instead. Figure 9 is deceptive in this regard as it does not explain that Green Belt land would need to be released to reprovide employment land.
- 9.6 Finally, there are deliverability issues associated with 1B with the need to redevelop existing employment land. Such redevelopment attracts significant costs in relation to demolition, site clearance and land remediation, often requiring assistance from public subsidy (and often at the expense of affordable housing delivery). This approach is therefore likely to cause significant delays to the delivery of housing land which will be contrary to the need to “boost significantly” housing land supply (NPPF para. 47).



## 10 QUESTION 12A – SPATIAL OPTION H1

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***Q12a – Do you support Strategic Option H1? What criteria should be used to select suitable sites?***

- 10.1 Barratt considers that the identification of housing allocations beyond the Growth Network should be informed by the SHLAAs, Sustainability Assessment and the Green Belt Review. These will enable the identification of sites having regard to sustainability/accessibility, deliverability/developability (“suitability”, “availability” and “achievability” tests (NPPF and PPG)) and Green Belt criteria (assessment against the five purposes of Green Belt in NPF para. 80).
- 10.2 The two Spatial Options are presented as mutually exclusive in the IOR which is unclear and considered to be a flawed assumption. Given the scale of the shortfall, it is likely that both small-medium (H1) and strategic Sustainable Urban Extensions (SUE) (H2) will need to be identified in order to meet the housing shortfall and it is necessary to provide a diverse range of housing allocations to ensure that all sectors of the housebuilding market are engaged in delivering housing simultaneously to meet needs as swiftly as possible.
- 10.3 To put the housing shortfall into context, 22,000 dwellings is the figure stated throughout the IOR purely to meet the Black Country’s needs and will equate to 629ha of net developable housing land (over and above all of the currently identified supply) when assuming a net density of 35 dwellings per hectare (as applied in the HSBP). This requirement would obviously increase if the Black Country agrees to meet the unmet needs of the wider HMA, and RPS has presented a higher OAN figure in response to Question 3 which would also increase the land requirement significantly. The shortfall will need to be met primarily through Green Belt release and the scale of requirement means that strategic releases in the form of SUEs will have to be delivered through the BCCS review process, in addition to small-medium Green Belt releases (the scale of which is not defined in the IOR).
- 10.4 Strategic residential allocations are generally defined in Local Plans as developments of at least 500 dwellings, although SUEs can be smaller in scale. We suggest a minimum size of 250 units and such larger sites should be allocated through the BCCS Review.
- 10.5 We concur with the statements in para. 4.28 of the IOR which acknowledges that SUEs are better placed to comprehensively deliver, or contribute towards, supporting physical and social infrastructure.

## 11 QUESTION 12B – POTENTIAL LOCATIONS

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### *Q12b – Do you think there are any potential locations that should be considered?*

- 11.1 Barratt has submitted a Call for Sites submission for land at Stencils Farm, Walsall, comprising a covering letter, completed Questionnaire and a suite of supporting technical reports which includes a “Development Framework Plan” providing an indication of the site’s development capacity; c.570 dwellings set within 18ha of green infrastructure.
- 11.2 The land at Stencils Farm provides a highly sustainable option to assist in delivering Walsall’s emerging housing need through the BCCS Review. Of the eight strategic residential Green Belt sites in the Borough previously promoted for residential development, Stencils Farm provides a limited contribution to the five national purposes of Green Belt (second to only one other site) (refer to **Appendix 1**). It lies close to Walsall town centre with good public transport and walking/cycling links to local facilities, and is well contained providing a valuable opportunity to create a robust settlement edge and Green Belt boundary with a soft transition to the countryside. This transition would comprise a strategic area of green infrastructure adjoining the canal, providing a linkage between two “Wildlife Corridors”.
- 11.3 The site is deliverable and we respectfully request that it be considered as an allocation through the BCCS Review.
- 11.4 The potential scale of development on the land at Stencils Farm means that it would qualify as a Sustainable Urban Extension but it is presented in response to this question given that the scale of SUEs has yet to be determined.
- 11.5 Barratt intend to fully engage with Walsall Council and the local community over forthcoming months to discuss the site and proposed development in greater detail.

## 12 QUESTION 13A – SPATIAL OPTION H2

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### **Q13a – Do you support Spatial Option H2? What should the characteristics of SUEs be? What criteria should be used to select suitable sites?**

- 12.1 Barratt considers that the identification of housing allocations beyond the Growth Network should be informed by the SHLAAs, Sustainability Assessment and the Green Belt Review. These will enable the identification of sites having regard to sustainability/accessibility, deliverability/developability (suitability, availability and achievability test (NPPF and PPG)) and Green Belt criteria (assessment against the five purposes of Green Belt in NPF para. 80).
- 12.2 Barratt supports the identification of Strategic Urban Extensions (SUEs) under Spatial Option H2. However, the two Spatial Options are presented as mutually exclusive in the IOR which is unclear and considered to be a flawed assumption. Given the scale of the shortfall both small-medium (H1) and SUE (H2) will need to be identified in order to meet the housing shortfall and it is necessary to provide a diverse range of housing allocations to ensure that all sectors of the housebuilding market are engaged in delivering housing simultaneously to meet needs as swiftly as possible.
- 12.3 To put the housing shortfall into context, 22,000 dwellings is the figure stated throughout the IOR purely to meet the Black Country's needs and will equate to 629ha of net developable housing land (over and above all of the currently identified supply) when assuming a net density of 35 dwellings per hectare (as applied in the HSBP). This requirement would obviously increase if the Black Country agrees to meet the unmet needs of the wider HMA, and RPS has presented a higher OAN figure in response to Question 3 which would also increase the land requirement significantly. The shortfall will need to be met primarily through Green Belt release and the scale of requirement means that strategic releases in the form of SUEs will have to be delivered through the BCCS review process, in addition to small-medium Green Belt releases (the scale of which is not defined in the IOR).
- 12.4 Strategic residential allocations are generally defined in Local Plans as developments of at least 500 dwellings, although SUEs can be smaller in scale. We suggest a minimum size of 250 units and such larger sites should be allocated through the BCCS Review.
- 12.5 We concur with the statements in para. 4.28 of the IOR which acknowledges that SUEs are better placed to comprehensively deliver, or contribute towards, supporting physical and social infrastructure.

## 13 QUESTION 13C – POTENTIAL LOCATIONS

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***Q13c – Are there any potential locations that should be considered for SUEs and what infrastructure would be required to support these?***

- 13.1 Barratt has submitted a Call for Sites submission for land at Stencils Farm, Walsall, comprising a covering letter, completed Questionnaire and a suite of supporting technical reports which includes a “Development Framework Plan” providing an indication of the site’s development capacity; c.570 dwellings set within 18ha of green infrastructure.
- 13.2 The land at Stencils Farm provides a highly sustainable option to assist in delivering Walsall’s emerging housing need through the BCCS Review. Of the eight strategic residential Green Belt sites in the Borough previously promoted for residential development, Stencils Farm provides a limited contribution to the five national purposes of Green Belt (second to only one other site) (refer to **Appendix 1**). It lies close to Walsall town centre with good public transport and walking/cycling links to local facilities, and is well contained providing a valuable opportunity to create a robust settlement edge and Green Belt boundary with a soft transition to the countryside. This transition would comprise a strategic area of green infrastructure adjoining the canal, providing a linkage between two “Wildlife Corridors”.
- 13.3 The site’s location to the east of Walsall adjoining the Aldridge Road (A454) means that minimal new infrastructure would be required – the site already benefits from a roundabout which can provide a primary point of access from the Aldridge Road, and this road is served by regular bus services linking both Walsall and Aldridge.
- 13.4 The site is deliverable and we respectfully request that it be considered as an allocation through the BCCS Review.
- 13.5 Barratt intend to fully engage with Walsall Council and the local community over forthcoming months to discuss the site and proposed development in greater detail.

## 14 QUESTION 13D – DETAILED SUE GUIDANCE

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***Q13d – Do you think that the Core Strategy should set out detailed guidance for the development of SUEs, rather than details being determined at a local level in light of local policies?***

- 14.1 It is important that the identified development needs of the Black Country and wider Housing Market Area (HMA) are met as quickly as possible so we urge the authorities to progress the review as swiftly as possible, and to ensure that strategic allocations and SUEs are delivered through the BCCS review, rather than lower order development plan documents. It is essential that the strategic sites/SUEs are allocated through the BCCS review process as this is the strategic development plan and sites will be identified through the Green Belt Review which will cover the whole of the Black Country. Indeed, some of these sites may be cross-boundary allocations i.e. meeting the needs of one authority in another, so it is critical that the strategic development plan provides a clear policy framework for them.
- 14.2 We draw reference to the South Worcestershire Development Plan and Gloucester, Tewkesbury and Cheltenham Joint Core Strategy, both of which allocate strategic sites.
- 14.3 Deferring such allocations and/or detailed development guidance will only serve to delay the delivery of the developments which will fail to ensure that development needs are met as they arise.

## 15 QUESTION 15A – EXPORTING HOUSING NEEDS

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***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?***

- 15.1 The NPPF requires that authorities plan to meet their objectively assessed housing need (OAN) (para. 14, 17, 47 and 182). As such, there needs to be a rigorous approach to the identification of potential housing sites with a view to providing all of the Black Country’s needs within the Black Country. To date, the SHLAAs have focused upon the urban area to accord with the adopted BCCS spatial strategy but the BCCS Review must now undertake an assessment of capacity within the Green Belt.
- 15.2 The results of the Greater Birmingham HMA Strategic Growth/Locations Study are yet to be published and the Black Country Green Belt Review will not be completed until mid-2018. However, it is essential that the authorities now undertake a proactive and thorough approach to the assessment of potential Green Belt release because the only potential capacity within adjoining authorities to assist in meeting any shortfalls in the Black Country would be through Green Belt releases in those authorities.
- 15.3 Walsall is unique in the Black Country context insofar as it encompasses an extensive area of Green Belt which lies in-between Walsall, Birmingham, Aldridge and Brownhills. It is understood that this amounts to c.70% of the Green Belt within the Black Country as a whole. Whilst not all of this will be suitable for release and development the Green Belt Review must recognise that Walsall has a significant area of undeveloped Green Belt land which provides an opportunity to accommodate its own shortfall (and potentially others) through selected Green Belt releases to permit sustainable urban extensions within the heart of the West Midlands conurbation, and in close proximity to Birmingham (which has the largest shortfall of all the authorities).