



Acres Land & Planning Ltd

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7th September 2017

Black Country Core Strategy Consultation,
Dudley MBC,
Council House,
Priory Road,
Dudley,
DY1 1HL

Dear Sirs,

Black Country Core Strategy; Issues and Options Consultation.

Introduction.

I am writing to you on behalf of Hallam Land Management, which has a long and successful reputation in working with local authorities to promote land for both housing, industrial, commercial and mixed-use development throughout the country. Their approach is to take a positive initiative in promoting land through strategic and local plans to ensure that homes and jobs are delivered for the benefit of local communities and for the wider economy.

For some time, Acres Land & Planning Ltd has been promoting a 10.68ha site (SHLAA site 222) at Sandy Lane in Codsall within South Staffordshire District on behalf of 'Hallam Land'. The site, although currently within the Staffordshire Green Belt nevertheless forms a logical extension to a recently approved housing development to the north of the village which was released from the Staffordshire Green Belt as a 'safeguarded site' in the previous South Staffordshire Local Plan.

The Black Country Issues and Options Document represents a first but very important step in the planning of the area within the wider West Midlands Metropolitan sub-region which also has a critical bearing on the surrounding local authorities including South Staffordshire. We therefore warmly support the integrated approach which the Black Country authorities are adopting and specifically the decision (referred to within paragraph 3.12 of the document) to

assess the Black Country and South Staffordshire together as a joint housing sub-market.

The Issues and Options.

Question 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?

The challenges facing the West Midlands (including the Black Country) are critical both in terms of the scale and complexity of housing needs and the changes now being experienced in the local economy. These are influenced by the pressures being felt from Birmingham, triggered in part by the potential growth being stimulated by the forthcoming construction of HS2 and other infrastructure projects but also the uncertainties created by the economic and political changes likely to stem from the decision to leave the European Union.

We broadly support the need for a partial review, retaining the basis of the existing Core Strategy - Hallam Land do not wish to prolong the exercise by starting entirely afresh and re-inventing those aspects of the planning strategy which already work effectively - but we do feel the review needs to be sufficiently far-reaching to challenge the current Core Strategy and to test its robustness thoroughly and also to reflect the changes in policy approach since the NPPF was introduced.

Hallam Land very much welcome the acknowledgement within paragraph 1.19 of the Issues and Options Document that not all growth can and will occur within the existing built-up area. We welcome the pragmatic approach which the Black Country authorities are taking towards the over-reliance on re-used brownfield and derelict sites in the area. The Black Country has a legacy of contaminated land including many sites with old mine shafts and other physical and technical challenges. These will not always be suitable for housing development and hence capping and re-use for commercial or recreational land may be the only viable option. Furthermore, as the Issues and Options report emphasises, the welcome growth in the regional economy means that fewer former industrial sites may be now available for housing.

We applaud the decision to review the Green Belt, jointly in the Black Country and in South Staffordshire. Although it is important to protect the concept of the green belt and to adhere to its principles, the Green belt must be able to respond to the inevitable pressures for urban expansion (unless other options can be delivered instead). Against a background where the GB boundaries have not been reviewed since the 1970's and are very tight (see Figure 5), this is both desirable and essential. There can be no sustainable case for imposing rigid Green Belt constraints which would otherwise impede growth in the Black Country which desperately needs it.

We agree that the existing two-tier forward planning approach should be retained. Most Local Plans are now currently emerging as single-tier plans, but this Core Strategy provides a strategic plan for a large part of the Metropolitan area. The individual Metropolitan Boroughs of Dudley, Sandwell, Walsall and Wolverhampton

and those Districts surrounding the Black Country – such as South Staffordshire – will then develop the policies, identify the sites and implement the strategy.

Question 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.

Hallam Land acknowledges the list of strategic challenges and opportunities identified as ‘Key Issues’ in paragraph 3.1 of the Core Strategy document.

Within the first of these – the **evidence base** - Table 1 provides an exhaustive list of studies, research and evidence which has either been undertaken or is in progress to assist in the preparation of the Black Country Review. This is impressive, but the most important consideration is that the strategy should be consistent, integrated and holistic. The studies therefore need to be considered as a whole and should be compatible with plans and proposals which are emerging within the surrounding areas, especially in the Birmingham housing market and in Southern Staffordshire. In that context, notwithstanding the reference to ‘Working with neighbours’ one document which, in our view, is lacking is a draft Duty to Co-operate Statement which shows the relationships between areas and the extent to which pressures for housing and jobs are being accommodated across the sub region.

In the absence of a wider West Midlands Regional Strategy, which places Birmingham and the Black Country in their broader context, it is really important to ensure that the Black Country is planned as part of a functioning sub-region. This may well emerge from the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study (due to be published later in September 2017) and within the WMCA Land Delivery Action Plan published (a few days ago) in early September 2017 and due to be considered by the WMCA Board.

The second document which is not referred to is the recently published WMCA Land Commission report published by the West Midlands Land Commission in February 2017 on behalf of the West Midlands Combined Authority (WMCA). This report attempts to address the pressures for and against delivery of development in the West Midlands Authorities’ areas. The WMCA has yet to formally adopt the report, but it is currently being addressed by the GBSLEP and the WMCA.

The third document which **is** in the list, the West Midlands Combined Authority Strategic Economic Plan (SEP) - completed in 2016 - clearly needs to inform the review of the Black Country. The SEP is much more ambitious than both the statutory plans and the Strategic Housing Needs Survey (undertaken by PBA in 2015). The prospect of creating some 500,000 new jobs and 215,000 additional homes within the region (as advocated by the SEP) needs somehow to be reconciled with the more modest plans currently being pursued by the West Midlands’ local authorities. Clearly unless the respective Metropolitan Councils plan for integrated housing and employment growth, it simply won’t happen.

Question 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.

The assessment of housing need in the Black Country is extremely complicated, since it is surrounded by local authorities on all sides. The Housing White Paper advocates a standardised approach to housing needs assessment which should narrow the areas for debate in settling OAN (Objectively Assessment Need) figures. This may work where housing markets are relatively self-contained with identifiable economic and housing catchment areas – but this is clearly not the case for the Black Country.

The Black Country housing market tends to operate at two levels – both as a strategic market stretching across the whole West Midlands Metropolitan sub-region with people moving in and out both regionally, nationally and internationally, and also as a complex network of local markets, catering for the many smaller communities which have traditionally constituted the Black Country.

On the demand side, it is not just a case of looking at the consequences of people living longer and families and households breaking down more often, but also a result of stronger in-migration both from elsewhere in this country and abroad which fuels household formation. The Black Country has traditionally become a lower-priced housing market area accommodating households with a wide range of skilled, semi-skilled and unskilled jobs. It therefore tends to act as a ‘reception area’ for inward international migrants in addition to catering for both intra-regional movement and local demand. The 78,190 does not contain allowances for economic growth or providing additional affordable housing.

Figure 6 adds 3,000 dwellings as a contribution to supply in the wider Greater Birmingham Housing Market Area. This should logically be a demand component but is presented as a one-off contribution to help meet a neighbouring OAN. Whilst pragmatically we understand the way in which these numbers have been devised (as a gesture to help resolve ‘Birmingham’s needs’), in reality it might be more robust to explore the intra-regional migration patterns to see whether 3,000 is a realistic contribution to the integrated housing market. We are inclined to feel that the Black Country should be absorbing more of the ‘Birmingham boom’ which is arising in part from the growing attractiveness of Britain’s second city. Of course, a West Midlands Regional Plan would have been able to tackle this exercise. Sadly, the Duty to Co-operate mechanism is very blunt instrument in resolving cross-boundary issues.

With that in mind it is difficult to simply ‘rubber stamp’ the broad assessment outlined in the Issues and Options document. We therefore reserve judgement on the proposed OAN of 78,190 homes (2014-2036) until further work has been undertaken to explore both the sub-regional needs and examine how the Black Country OAN relates to the Districts around it – especially South Staffordshire (and

Telford and Wrekin which has historically acted as destination for out-migrants from the Black Country) to determine whether the 78,190 figure is robust. On the supply side, we acknowledge the broad thrust of the 5 stage assessment within Figure 6, (although it would be logical if the order of the items in the histogram was consistent with the diagram). It's upside down.

A few points are relevant here:-

Firstly, the number of completions (2011-2014) should be a matter of fact, however it may be worthwhile looking at the mixture of dwellings delivered against need to see to what extent they match demand/requirements. Other Districts outside the Black Country may be better placed to provide new family housing,

Secondly, the existing 'supply' registered in the SHLAA may be a helpful guide towards the capacity within the urban area of the Black Country – however it is not clear whether all the SHLAA sites have been tested for availability and constraints and what proportion of those sites are deliverable and at what density. Further work needs to be done on this to clarify the status of 'committed' sites.

Thirdly, paragraph 3.15 states that identified sites and windfall sites have a potential to deliver around 8,335 homes (2026-36) but it is not clear whether there is any overlap between the 'potential' windfalls and the SHLAA sites and/or the scope for increased density housing allocations in town centres.

Fourthly, paragraph 3.16 refers to the scope for the re-use of employment sites of which 300ha (delivering 10,400 homes) may release land over the 10 year period from 2016-2026. However, the document acknowledges that this may reduce as a source of housing land, especially if the West Midlands economy continues to improve. It makes little sense to re-direct employment development onto greenfield land within Green belt (thereby displacing jobs from local communities) if housing is then being steered to sub-optimal contaminated sites within the urban areas which are more expensive to remediate to residential standards.

Fifthly, there is no mention within the assessment of replacement housing to cater for older homes (or sub-standard property) reaching the end of its life. This element is normally built-in to the demand side of the equation, but in the Black Country the decaying housing stock and/or system built housing affected by design and construction problems could further reduce the supply available. (We have not investigated this aspect and more work may need to be done on this).

Finally, the residual figure of 24,670 dwellings which (according to paragraph 3.18) may need to be accommodated within the green belt (in the Black Country or elsewhere) will need to be balanced against other options if the sequential approach towards land allocation within the Housing White Paper is implemented. Against that background, the 'value' of the Black Country Green Belt in meeting the 5 key purposes of green belt will need to be measured against the merits of releasing arguably less sensitive green belt sites in South Staffordshire or indeed negotiating

to release non-green belt land in the former New town of Telford, where the infrastructure is already in place and there is a growing industrial base.

Question 4 – Do you consider the employment land requirement identified for the Black Country up to 2036 in the EDNA is appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.

The nature of the economy has changed significantly over the last 10-15 years. Although the Black Country is the traditional home to extractive industries, manufacturing and especially metal-bashing much of this heavy industry has moved to other countries to be replaced by higher value manufacturing and services – including distribution. At the other end of the scale, the economy now encourages smaller-scale initiatives with a sharp rise in small businesses and self-employment.

It is therefore much more difficult to gauge the employment land requirements since the more traditional industrial estate forms only a partial element of employment needs. Employment may also be transient and not necessarily place-based. Recent history has shown that there is a pressing need for readily available large employment sites to meet the one-off inward investment such as JLR which tends to create large numbers of jobs, both in direct and spin-off employment. Similarly, distribution now requires much larger loading bays with high spans which can accommodate the needs of the current market. The West Midlands Strategic Employment Sites Study and the Black Country & South Staffs Sub-Regional High-Quality Employment Land Study will provide an important part of the evidence base. We therefore support the portfolio approach to the provision of employment sites.

At the more localised level the town and local centres are becoming less attractive to the major retail multiples and more popular with local specialist shops, coffee shops and restaurants and entertainment venues. Disappointingly, despite Birmingham and the Black Country being world famous for the historic canal network, there is no reference at all to the potential of the canals in creating and boosting the local economy. The only reference to canals is within Policy EN4 where a cautionary approach is taken due to the possible ecological implications of restoration. Yet many examples exist within Wolverhampton, Walsall, Dudley and Sandwell where the canals have been at the heart of urban regeneration and others could be in future. There are also opportunity sites elsewhere in Telford where this applies.

The Economic Development Needs Assessment (EDNA) suggests the review should plan for up to 800ha of additional employment land for the Black Country from 2014-2036 which reflects the loss of around 300ha to housing and reflects the economic growth aspirations of the Black Country SEP. This residual figure assumes that a further 90-170ha of employment land is released within South Staffordshire to reflect the needs of the Black Country. Logically this will also have a housing implication within South Staffordshire rather than just within the Black Country despite serving the Black Country's needs. Clearly if this is the basis for the employment target – the same principle must also apply to the housing target.

Otherwise we make no detailed comment on the 300ha 'gap' figure which emerges as the employment land requirement within paragraph 3.27 of the document.

Key issue 5 – Protecting and enhancing the environment.

It is self-evident that planning policies should be devised to protect the environment and to avoid damage to Special Protection Areas (SPA's), RAMSAR sites, water quality and other aspects of the natural environment.

We are extremely sceptical however about the outcome of the environmental impact work of the Cannock Chase SAC Partnership. Local authorities involved have sought to impose a levy on house-builders operating within the 15km catchment zone on the assumption that increased 'pressure' will be imposed on Cannock Chase from the building of houses within the area. Having examined this consultancy work in depth previously, we are not convinced that the study undertaken on behalf of Natural England has demonstrated that the 'pressure' on the wildlife necessarily arose from newcomers. Rather it was caused by specific 'user groups' or people acting irresponsibly for example mountain bikers, horse riders, dogs, or people starting fires, some of whom already live locally or are travelling from further afield.

On a more general note, the implication that the use and enjoyment of public open spaces should be discouraged through the imposition of a 'dwelling tax' on housing is counter-intuitive. It conflicts with Local Councils' own tourism strategies (which try to attract people to the Chase) and is contrary to wider public health objectives within planning which promote walking, cycling and taking other forms of exercise. The Cannock Chase SAC Partnership and Natural England therefore need to re-assess their evidence base carefully and review this policy so that it does not impose a burden on builders or indirectly future residents of the Black Country and those people moving to those parts of Districts such as South Staffordshire and Stafford and those places which lie within the 15km catchment of the Chase

Question 5 - Do you agree with the proposed approach to the Black Country Green Belt Review? Yes/No; If not, what additional work do you think is necessary?

We welcome the recognition that the implications of future growth in and around the Black Country will require a systematic review of the Black Country green belt and that this will be done in a consistent way with the other local authorities in the Birmingham and Black Country housing market area. The emerging Greater Birmingham and Black Country HMA Strategic Growth Study, being produced by GL Hearn provides the right context for the Black Country Green Belt review and it is logical (as suggested in paragraph 3.47) that this should also cover the South Staffordshire area which falls into the same general housing market area and maintains strong economic links.

The completion of the Preferred Spatial Option report for the Core Strategy Review in September 2018 seems a sensible timescale in view of the complexity of the task.

Since the development of Green Belt is regarded as a last resort, we think it would be logical to also dovetail the strategic housing and green belt review with the exploration of options to deflect housing provision to Telford which has long served to cater for the needs of people from the Black Country with ambitions to move.

Question 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?

The key issues outlined in paragraph 3.1 are as follows:

- Updating the evidence base
- Meeting the housing needs of a growing population
- Supporting a resurgent economy
- Supporting strong and competitive centres
- Protecting and enhancing the environment
- Reviewing the role and extent of the green belt
- Keeping the Black Country connected
- Providing infrastructure to support growth
- Working effectively with neighbours.

We agree that, subject to the caveats which we have listed above, these key issues outlined in Part 3 represent the factors which need to be taken into account through the Core Strategy.

Question 7 - Do you think that the Core Strategy vision and sustainability principles remain appropriate? Yes/No; If not, what alternatives would you suggest?

Yes. We broadly support the Core Strategy Vision and sustainability principles. However, although we accept that ideally it may be desirable to 'put brownfield first' in terms of the authorities' priorities, in practical terms this is not always feasible. In any event, a 'brownfield first' strategy for housing is not actually Government policy. Authorities are expected to encourage and promote the development of brownfield sites for housing but this may not necessarily mean putting brownfield before greenfield development. The market would grind to a halt if they did so.

Question 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?

The 10 objectives seem broadly sound as a basis for planning and regeneration of the review period. However, although there is a mention of existing housing areas in Objective 4, there is no actual reference to providing an adequate level of new housing, in places where people want to live. Furthermore, the Objective 3 which refers to '*Model sustainable communities on redundant employment land in the Regeneration Areas*' does not reflect the change in stance within the review which will now be looking at a wider portfolio of sites, including some Green belt sites both

with the Black Country and South Staffordshire. There is also no reference to working in partnership with neighbouring authorities or the private sector, something which is essential to achieve delivery.

Question 9 – Do you agree that Policies CSP1 and CSP2 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 CSP1 and CSP2 in response to new challenges and opportunities?

Yes. We agree that policies CSP1 and SP2 remain relevant. But they may be rather too prescriptive in trying to direct development to specific centres, locations and corridors. The Review provides the opportunity to gauge to what extent the current Core Strategy has succeeded both in focusing development on preferred locations but more important in boosting and regenerating the Black Country. These policies may have unintended consequences if they tend to deflect growth elsewhere.

It may also be appropriate to consider whether there are other places in the Black Country which now need a boost other than the main centres and corridors. Since most of the Black Country is within built-up areas there may be a case for more flexibility with a greater focus on design rather than location. We would also suggest that the canal network provides an opportunity for water-based regeneration which can improve the environment through waterside development and create a rich mixture of residential, small scale commercial and recreational development.

Question 10 – In continuing to promote growth within the Growth Network, is there a need to amend the boundaries of any of the Regeneration Corridors in the existing Core Strategy? Yes/No; If so, which boundaries and why?

Question 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?

Question 11b – Are there any current employment areas that might be considered suitable for redevelopment to housing? Yes/No; Please submit specific sites through the ‘call for sites’ form.

Yes. The Regeneration Areas will need to be extended. We don't have fixed views about the merits of options 1A and 1B. Indeed a 'one size fits all' approach may lead to a contrived solution which becomes difficult to deliver in practice and stifles development which could otherwise legitimately occur. According to Government policy the use of the Black Country Green Belt should be viewed as a last resort, hence there should logically be a pointer towards Option 1B in preference to 1A. The canal routes could provide employment areas where regeneration could result in more housing as part of mixed used development thereby improving the overall environment and bringing the Black Country's history and culture to life. We agree

that using green belt in South Staffordshire rather than the Black Country should be considered where pressure and potential impact may not be as great. The scope for exporting some housing needs to Telford where green belt is not an issue and infrastructure is already in place, should also be seriously considered.

Question 12a – 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.

Question 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).

The designation of Green belt is based on 5 specific purposes, most of which are relevant to the Black Country. However, Green Belt is a strategic policy tool, not an instrument of landscape or recreational policy – although in some cases they may well function as recreational areas in practice. We feel there **is** a valid case for rounding-off parts of the Green belt in the Black Country and in South Staffordshire. The Black Country, especially Walsall, has a network of green wedges which separate smaller communities which would be hard to justify on current criteria and in some cases are less sensitive as green belt.

The criteria for selection of site review, should be related to the initial reasons for designation of green belt. This is consistent with the findings of the West Midlands Land Commission Report which suggests that there should be review of the Green Belt within the whole West Midlands Metropolitan Area and that it should be consistently applied and related to those areas of land which perform poorly against the five statutory purposes of the green belt.

In defining new areas and boundaries, as suggested within the NPPF (which was unchanged from the former PPG2) local authorities should look for clear defensible boundaries such as rivers, roads, railways and tree lines or field boundaries where the case for striking a green belt edge is stronger.

There may also be a case, as the Government’s Housing White Paper suggests for redefining green belt boundaries on their outer edge to retain the width of protection for towns. In addition, although green belts are not intended to be an environmental or landscape policy, there is a strong case (as the Landscape Institute has suggested) to adopt a separate landscape or recreational strategy for some green belt land to strengthen its positive role in providing value for society (including those residents of the urban areas who may lack accessible public open space, rather than being an enclave of protected green land for people who occupy high value or more exclusive homes.

In South Staffordshire there are also areas where green belt could be rounded-off without damaging its purpose, such as north of Codsall on land being promoted by Hallam Land at Sandy Lane (SHLAA site 222) which would extend a recently consented site and where the 5 purposes of the green belt would not be

compromised. We have submitted a separate contribution under the 'Call for Sites' including the Sandy Lane, Codsall site.

Question 13a – Do you support Spatial Option H2? Yes/No; 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.

Question 13b – What infrastructure do you think would be needed for different sizes of SUEs?

Question 13c - Are there any potential locations that should be considered for SUEs (please submit through the 'call for sites' form) and what infrastructure would be required to support these?

Question 13d - Do you think that the Core Strategy should set out detailed guidance for the development of SUEs (e.g. type and tenure of housing, specific infrastructure required), rather than details being determined at a local level in light of local policies? Yes/No; Any further comments?

There may well be cases where larger sustainable urban extensions are deemed appropriate. However, comparative assessment work would need to be undertaken and a strong case demonstrated if large areas of green belt were to be sacrificed to development. The Housing Green Paper emphasises that the use of green belt land for development should be a 'last resort' and rightly points towards peripheral rail stations as providing an obvious focus for larger scale development.

Inevitably, larger free-standing settlements in the green belt would take longer to develop albeit they would deliver a broad range of services. Easy access to jobs and public transport would need to be an essential pre-requisite to any sustainable urban extension. Suitable SUE's would need to conform to essential criteria to justify their selection in the first place – though the precise nature of the SUE would no doubt emerge through public and private sector negotiation and partnership.

Question 14 – Do you think there are any other deliverable and sustainable Housing Spatial Options? Yes/No; If yes, please provide details.

We have already mentioned above that other options rather than encroaching onto the Black Country green belt, do exist. The larger South Staffordshire villages which are served by public transport provide a logical case for growth. In the case of Codsall/Bilbrook there are 2 railways stations and the village is within cycling distance of the new i54 JLS plant and the Pendeford Business Park close by. Carefully selected green belt releases in these locations offer good potential links

between homes and jobs whilst exploiting the wide range of facilities which Codsall enjoys. The Sandy Lane site, promoted by Hallam Land will be surrounded on three sides by development, once the adjacent Watery Lane site is built, and is ideally suited for development.

Question 15a - 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? Yes/No; 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?

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

Question 15c - Do you think there are ways to ensure that exporting housing will meet the needs of people who would otherwise live in the Black Country? (e.g. transport improvements, provision of affordable housing, creation of employment opportunities) Yes/No; If yes, please provide details.

Telford New Town has long provided an opportunity for a new life for people moving out of the Black Country since its designation in 2017, indeed the original purpose of the New Towns were to serve the wider housing needs of the West Midlands Metropolitan area. Although Telford has since lost its formal New Town designation and no longer has Assisted Area status, it still retains the culture and ambition for growth and enjoys much of the infrastructure needed for growth which has already been provided at public expense. There are potential strategic sites in Telford, for example at Wappenshall to the north of the town, which are well linked to both existing and planned industrial jobs as well as having an attractive environment and close proximity to all the facilities existing in a burgeoning new community.

Strangely, Telford & Wrekin Council currently seems reluctant to continue its natural growth trajectory, or even to reach its original population target, but the Telford Local Plan Inspector has recently rejected the submitted housing strategy within the emerging Local Plan Review, and sought higher housing numbers, a justification for the selection of sites within and an early review within the Proposed Modifications.

Wappenshall provides scope for the delivery of 2,500 new homes within a restored canal-side environment lying adjacent to the built-up area of Telford, close to the major industrial estates of Hortonwood and Hadley and in a location where public-sector land owned by HCA can be levered into the scheme. The Proposed Modifications to the Telford & Wrekin Local Plan now provides a further opportunity to examine new initiatives – such as Wappenshall, which could bring all round housing, economic, recreational and tourism benefits to the town.

Telford provides a natural destination for current residents of the Black Country who could still commute the 15 miles to jobs at i54 or Pendeford Business Park using the M54 motorway or travel by train. Alternatively, there will be further job provision

locally which would enable people to start a new life and career whilst retaining their close links with the Black Country – just as previous generations have done before them.

Questions 16 – 20, Spatial Employment Options (E1 – E4).

We have no specific comments to offer on the alternative Employment Options for the Black Country.

Question 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.

Yes. we would expect Policy DEV1 to be reviewed as a matter of course as part of the review of the Core Strategy, which could include the imposition of infrastructure requirements to meet future community needs, subject to any changes in the CIL regime which may be announced in the coming months, following the CIL review.

Questions 22-28, Social and Physical Infrastructure.

We have no further comments on these aspects.

Question 29 - Do you think there are any other tools or interventions that could be used to ensure enough infrastructure is provided by developments? Yes/No; If yes, please provide details.

Question 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.

The use of generalised and site-based viability assessments are likely to be important in determining whether schemes can progress and if so, what level of infrastructure – social and physical – they can support. Paragraph 5.28 indicates that some 25% of potential housing sites and 30% of employment sites in the Black Country are unviable to develop. This legacy of contaminated land often precludes the development of sites and makes affordable housing difficult to deliver on others.

In addition to the mechanisms outlined in paragraph 5.24, such as clawback, or phased viability assessments, it may be possible to link or cross-subsidise green belt and brownfield sites. This has been suggested previously albeit often flounders unless the two sites are in the same ownership where delivery can be assured. Green belt sites would (in general) be capable of offering a higher level of infrastructure which could tip the balance in terms of justifying their release. Grant aid, for example through the Black Country LEP, the WMCA or by using the HCA's new £3bn Home Building Fund which is designed to assist with infrastructure could assist.

The West Midlands Combined Authority has just released (September 2017) its Land Delivery Action Plan which includes funding initiatives to assist in the delivery of land for housing.

Question 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?

The Black Country is a prime example where additional public funding may be necessary to lever out sites for regeneration. In addition to those areas of support from Government, HCA, LEP's and now WMCA there could be Heritage Lottery funding where for example there are old canal structures are involved. As para 5.38 indicates, the Housing White Paper signals potential changes to the CIL regime which may result in a standardised tariff rather than the present CIL floorspace formula.

It is also possible that the Government may encourage the Black Country to pursue its Garden Village bid, which could then be accompanied by associated funding for development and renewal.

Question 32 - Do you think that the proposed approach to incorporate health and wellbeing issues in the Core Strategy review is appropriate? Yes/No; If no, please provide details

Question 33 – Is there more that the Core Strategy can do to address health and wellbeing issues in the Black Country? Yes/No; If yes, is a new policy needed to address such issues for example?

Question 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?

Question 34b - What design features do you think are key to ensuring new development encourages healthy living, which could be assessed through the HIA process?

Health and Wellbeing is becoming an essential element in the planning process and there are many potential initiatives and measures which could be employed to raise levels of health and wellbeing which could help to stem multiple deprivation in the Black Country, for example:

- Travel modes – including the encouragement of walking and cycling,
- public open space – including facilities to encourage more exercise and improvement of quality of life
- reduction in diesel emissions for example through traffic restraint and pedestrianisation and the possible removal of speed humps,
- the juxtaposition of land-uses to encourage better home/job relationships including the promotion of working from home,

- possible education on diet and exercise – especially for children.

A Health Impact Assessment will be required.

Question 35 - Do you support the proposed approach to housing land supply? Yes/No; If no, please explain why.

We certainly support the need to update the Policy HOU1 figure and to review the trajectory and the balance between brownfield and greenfield development, now that the Councils in the Black Country recognise that some future housing development will need to go onto the green belt. The maintenance of a generous 5 year housing land supply is an essential element of the NNPF as part of the commitment to 'boosting housing delivery' within paragraph 47 of the document, which should apply to all four local authorities. It is unclear however how the housing provision and housing land supply for South Staffordshire will work, bearing in mind it is outside but integral to the Black Country.

If the Black Country authorities are planning to reduce the degree of flexibility on the delivery of strategic sites (as indicated in paragraph 6.22 and also introduce a 505 per annum small site allowance then there will need to be plenty of leeway in the provision on sites to ensure that targets are met.

Question 36 - Do you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed? Yes/No; If yes, what standards should be applied instead, for example should the minimum net density of 35 dwellings per hectare be increased to maximise brownfield housing delivery?

Question 37a - Do you think that the existing Policy HOU2 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why

Question 37b – If no, should it be reduced to 11 homes or more? Yes/No; If no what other threshold should be used and why?

Question

Question 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?

Question 39 - Do you think separate accessibility standards are needed for particular types of housing e.g. housing for the elderly or affordable housing (as occupiers may be less mobile and more dependent on public transport)? Yes/No; If yes, please provide details.

Question 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.

We are not in favour of applying specific housing mix criteria for sites, unless they are sufficiently large where a mix and variety of dwellings is important. The housing

mix should be related to the specific site circumstances and ideally determined through pre-application discussions. They should not be prescriptive.

It is logical to apply higher density expectations to sites close to public transport modes, whether within the green belt or not, but it may be dangerous to impose specific standards which fail to reflect the circumstances of particular sites we therefore support the proposal within paragraph 6.28 to remove this paragraph from the Plan.

Paragraph 6.30 refers to the growing need for Sheltered and Extra Care dwellings, estimated at about 5% of the requirement. The Councils should encourage the delivery of this type of property, but it will not be feasible to expect market sites to deliver an element of extra-care and sheltered accommodation which tend to have somewhat different locational requirements.

Finally, it may be tempting to apply housing requirements on density, mix and type according to the Council's SHMA but unless the expectations can be supported in terms of viability and deliverability they will not actually materialise.

Question 41 - Do you support the introduction of a policy approach towards self and custom build housing in the Core Strategy? Yes/No; If yes, would you support: A target for each authority? Yes/No; Any further comments – A requirement for large housing sites to provide serviced plots? Yes/No; Any further comments? Another approach altogether? Yes/No; If yes, please specify.

Government warmly support the idea of self-building as an opportunity for more people to get onto the housing ladder and a policy encouraging self-build plots would be sensible. However, self-builders tend to want specific isolated plots where they can 'do their own thing' or require custom built homes which are separate from larger standard housing sites. Any idea that builders should specifically reserve plots for self-builders could be self-defeating. In practice, small housebuilders will cater for self-build or custom building if it means selling a plot or a house in a different way.

Question 42 - Do you agree that the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? Yes/No; If no, please explain why.

Question 43 - Do you think that the existing Policy HOU3 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why. If no, should it be reduced to 11 homes or more? Yes/No; If no, what threshold should be used?

The Councils should set the target for affordable homes at the level which emerges from the evidence obtained from the SHMA. With the definition of affordable homes set to change to include starter homes it is admittedly difficult to pin down exactly what counts as affordable and what doesn't. The Black Country authorities should therefore set the right policy climate to encourage more affordable homes to come through. Where so many sites are affected by contamination and site stability

issues the ability to subsidise affordable housing may be problematic. Affordable housing may therefore need to emerge through public subsidy through Registered Providers and housing trusts, rather than necessarily through cross-subsidy.

Question 44 - Do you think that the affordable housing requirement for eligible sites in Question 43 should be kept at 25% of the total number of homes on the site? Yes /No; Any further comments? If no, should the percentage be increased to allow for the provision of affordable home ownership? Yes/No; If yes, what should the percentage be and why?

The current 25% quota is probably a helpful guideline, unless evidence from the SHMA demonstrates that a higher (or lower) percentage is justified. The lower level of subsidy now expected from developers (80% of market price) may make a high overall quota easier to achieve. This will be guided by the outcome of the SHMA which may assist in identifying the range and type of affordable housing needed, but this may well change over time and in any event, will need to be determined on a site by site basis.

Question 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.

There is every likelihood that green belt sites will be capable of delivering higher levels of affordable housing, but on the other hand may not be the most appropriate location for accommodating people without cars or access to employment. If there is a broad overall policy guideline but with a site by site assessment, this is likely to produce the most satisfactory result.

Question 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.

Question 48 - Do you agree that the requirement in HOU5, to demonstrate there is adequate alternative provision to meet the needs of the community served by a facility which is to be lost, should be reviewed? Yes/No; If yes, please explain why.

In a situation where Sandwell and Dudley both have CIL plans and policies but Walsall and Wolverhampton currently don't, creates a difficult situation in terms of producing a standardised policy for the Black Country as a whole.

S106 agreements have the ability to adapt to the circumstances of the specific site and reflect its viability and deliverability. But there are clear advantages of incorporating the funding of 'strategic' facilities through a pooled CIL policy – if the viability of each site is not prejudiced.

In principle, it is right that community facilities should be funded through developer contributions, however public funding for infrastructure is currently being

reassessed through the Government's CIL review and it may be sensible to await the outcome of this report before formulating policy on this aspect.

Question 49 – Is there still a need for existing Policy DEL2 in order to manage the release of poorer quality employment land for housing? Yes/No; If no, please explain why. If yes, should this policy be used to assess the release of employment land to alternative uses, other than housing? Yes/No; If yes, please explain why.

It is probably desirable to keep Policy DEL2 to enable the authorities to manage the release of poorer quality employment land. The Core Strategy has identified a higher than expected take up of employment land within the Black Country and hence the local economy should not be prejudiced by the lack of employment availability if it is needed. Furthermore, the Black Country needs a pool of poorer and cheaper sites in sub-optimal locations to find places for 'unneighbourly uses' such as scrap yards, storage sites and other uses which need to find a home somewhere.

Question 50 – Do you think that the Core Strategy should continue to set a target for the total employment land stock in Policy EMP1? Yes/No; Please explain why. Do you think that distinguishing between Strategic High Quality Employment Areas and Local Quality Employment Areas is still appropriate? Yes/No; Please explain why.

The scenario described in paragraphs 6.53 – 6.58 paints a very fluid picture on employment supply and need, with the turnover of sites catering for emerging needs but with a lack of larger strategic sites which could provide more jobs for the wider Black Country and south Staffordshire economy. We feel there is a need for a total employment land stock as a general guideline, but that the LEP needs to carefully review the nature of the economy so that growth is not held back by a lack of land.

Question 51 – Do you think that the criteria used to define Strategic High-Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?

Question 52 – Do you think that the criteria used to define Local Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?

Question 53 – Do you think that Strategic High-Quality Employment Areas should continue to be protected for manufacturing and logistics uses, with the other uses set out in Policy EMP3 discouraged? Yes/no; If not, what alternative approach do you recommend?

This strays outside my client's interests. However, we feel that the policies need to be reviewed against the background of the High Quality Strategic Sites Study (2015)

and the practical evidence coming forward from the Black Country LEP and the WMCA on the type of strategic sites which are likely to be needed and the extent to which these need to be 'ring-fenced' from more general employment sites.

Question 54 – Do you agree that the current approach in Policy EMP4 is no longer fit for purpose and should be amended to reflect a portfolio based approach? Yes/No; If no, what alternative approaches would you recommend?

We would support the views of EDNA that there needs to be a broad portfolio of sites rather than a single overall target. This should relate to sites within South Staffordshire as well as the Black Country.

Question 88 - Do you agree that the overall transport strategy supports all of the Core Strategy spatial objectives? Yes/No; Please explain why.

Question 89 - Do you support the proposed changes to the priorities for the development of the transport network? Yes/No; Please explain why.

Question 90 - Do you support the proposed changes relating to managing transport impacts of new developments? Yes/No; If no, please explain why.

Question 92 - Do you support the proposed approach to providing a coherent network for walking and cycling? Yes/No; Please explain why.

The Black Country is at the centre of the national trunk road and rail network, but at the same time has a network of local communications which serve the myriad of localised Black Country communities. It is important that any transport strategy recognises this dual role and that there is a focus on maintaining and improving the metro, bus, cycling and walking networks within the Black Country – also using the traditional canal network as a regeneration opportunity.

Question 94 - Do you support the proposed changes relating to environmental infrastructure and place-making? Yes/No; If you think that any other changes should be made to Policies CSP3 or CSP4, please provide details.

Question 95 - Do you think Garden City principles should be applied in the Black Country? Yes/No; If yes, how should they be applied? Should the application of Garden City principles be different for brownfield and greenfield sites? Yes/No; If yes, please explain why.

It is important that the Environmental networks within the Black Country are developed and improved to boost the image of the area and provide the enhancement in the landscape and environment to support the local economy and provide a platform for residential development.

The promotion of a Garden City for the Black Country was a positive initiative to raise the profile of the area and attract funding, but bearing in mind that the Black Country Garden City proposal incorporated a wide range of disparate and

unconnected sites the traditional concept and principles of a Garden City are unlikely to be easily translated into the Black Country context.

Question 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.

We support the proposal to remove the reference to the Code for Sustainable Homes since this has been deleted as a requirement from the NPPF.

Question 99 - Do you think that national standards for housing development on water consumption, national access standards or national space standards should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why. Should any standards be different for brownfield and greenfield sites? Yes/No; If yes, please explain how and why.

We are not convinced that there is a need to apply national standards for water consumption, national access standards or minimum space standards to schemes in the Black Country, unless there is a clear justification, all of which would tend to make housing less affordable. The same principle would apply for both brownfield and greenfield (and green belt) sites. Most builders adhere to Building for Life specifications and Building Regulations are becoming ever more stringent to cater for access and environmental standards.

Question 100 - Do you support the removal of the reference made to canal projects? Yes/No; Do you think that any other changes should be made to Policy ENV4? Please provide details.

Whilst there may be a case for the removal of references to specific canal projects we would expect to see a rather more positive strategy for both canal restoration and for regeneration relating to the canals to encourage exploiting the historic assets which the Black Country is famous for and enjoys.

Question 118 - Do you agree with the proposal to streamline and simplify the Core Strategy Monitoring Framework? Yes/No; If no, please explain why

We have no objection to removing redundant or superfluous monitoring targets and information to simplify and streamline the process. However, since the Black Country Core Strategy is being reviewed in tandem with the South Staffordshire Local Plan there may be a need for a monitoring schedule to link the two, so that South Staffordshire is able to assist in bringing forward sites to meet the Black Country's needs.

Question 119 – Do you think that a new Core Strategy policy is required? Yes/No; If yes, please explain why and provide details of the suggested policy.

We agree that there may be a case, as outlined in paragraph 6.2.6 to address changes to green belt so that they relate to specific sites rather than general areas, since new GB boundaries need to be properly defined and the 'exceptional circumstances' adequately tested.

Appendices B and C.

The monitoring figures within Appendices B and C indicate that the Black Country has fallen a little behind in its housing output (-3039) compared with its overall target for the cumulative plan period so far. Whilst this is not significant, it demonstrates that measures need to be taken to link the availability of sites with Southern Staffordshire where there are sustainable opportunities which are more readily available and to undertake a coherent and consistent review of the green belt to address the shortfall of sites.

Call for Sites – potential options.

We have already referred above to the Sandy Lane site at Codsall and will be submitting this as a potential opportunity to extend an existing consented site north of the village which was previously 'safeguarded' green belt land and together with the existing built-up area now surrounds the Sandy Lane site on three sides.

We have also referred to a potential strategic site at Wappenshall north of Telford which can be developed in conjunction with HCA land and has been promoted through the Telford & Wrekin Local Plan. Telford provides a genuine opportunity to take-up surplus requirement from the Black Country, to address a shortage of supply where green belt would not be affected.

I trust this submission is helpful in formulating your emerging Core Strategy review.

Yours sincerely

John Acres

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