

**From:** [REDACTED]  
**Sent:** 08 September 2017 12:28  
**To:** Blackcountrycorestra  
**Cc:** [REDACTED]  
**Subject:** Black Country Core Strategy Representations and Call for Sites Submission [NLP-DMS.FID419624]  
**Attachments:** 41922 Core Strategy Reps 08.09.17.PDF; 42017 Black Country Housing Needs Assessment - Headroom Report 05.09.17.PDF; CHESTER\_RD\_STREETLY\_DevStatement\_SEP\_2017\_v4\_email.PDF; 41922 BCCS Issues and Options Representations Pro-Forma 08.09.17.PDF; 41922 Chester Road, Streetly - Call for Sites Pro-Forma 08.09.17.PDF

Dear Sir or Madam,

I am pleased to attach on behalf of Taylor Wimpey UK Limited, the following documents in response to the Black Country Core Strategy - Issues & Options consultation and Call for Sites exercise:

Issues and Options Submission

- Issues and Options Representations Pro-Forma
- Issues and Options Consultation Representations (accompanied by Black Country Housing Needs Assessment Headroom Report);

Call for Sites Submission



- Call for Sites Pro-Forma (accompanied by Chester Road, Streetly Development Statement) – please note that a site boundary and location plan is included within the Development Statement.

Please confirm receipt of this submission and let me know if you have an issues downloading or opening any of the attachments. A hard copy of the call for sites submission (pro-forma and development statement) has also been sent to your offices.

Regards

[REDACTED]  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU  
[REDACTED]

lichfields.uk  

The GLA 2016-based Household Projections insight focus graphic. It features a teal background with the title 'The GLA 2016-based Household Projections' in white. Below the title is a yellow button with the text 'VIEW INSIGHT'. To the right is a preview of the 'Insight focus' report, which includes a photograph of a building, a bar chart, and a line graph. The report title is 'The GLA 2016-based Household Projections' and it includes a sub-headline 'The GLA 2016-based Household Projections' and a small image of a building.

This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible. Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.

**Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.**

<b>Chapter / Page / Question / Paragraph</b>
Please see accompanying representations document
<b>Do you agree or disagree with the approach set out in the relevant section and / or question?</b>
Please see accompanying representations document
<b>Comments (continue on a separate sheet if necessary)</b>
Please see accompanying representations document

# **Black Country Core Strategy Issues & Options Report Representations**

Taylor Wimpey UK Limited

September 2017

**LICHFIELDS**

**LICHFIELDS**

# **Lichfields is the pre-eminent planning and development consultancy in the UK**

We've been helping create great places  
for over 50 years.

**lichfields.uk**

# Contents

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
<b>2.0</b>	<b>Taylor Wimpey’s Responses to the Consultation</b>	<b>2</b>
	Purpose and Scope of the Review (Question 1)	2
	The Strategic Challenges and Opportunities (Questions 2-6)	2
	Reviewing the Strategy to Meet New Challenges and Opportunities	6
	Reviewing the Spatial Strategy	6
	Delivering Growth – Infrastructure and Viability	9
	Review of Existing Core Strategy Policies and Proposals	10
<b>3.0</b>	<b>Conclusion</b>	<b>16</b>

## 1.0 Introduction

- 1.1 These representations have been prepared by Lichfields on behalf of Taylor Wimpey UK Limited [Taylor Wimpey]. They form Taylor Wimpey's response to the Black Country Core Strategy [BCCS] Issues and Options Report consultation and are submitted for consideration in the formulation of a New Core Strategy for the Black Country boroughs (Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and the City of Wolverhampton Council).
- 1.2 These representations are accompanied by a technical report titled 'Black Country Housing Needs Assessment – Headroom Report' which independently assesses the housing needs for the Black Country and South Staffordshire.
- 1.3 These representations are submitted in the context of Taylor Wimpey's interest in land at Chester Road, Streetly and Bosty Lane, Aldridge. Call for Sites response forms are also being submitted alongside these representations and set out how the sites would; provide a sustainable location for residential development; no longer contribute to Green Belt purposes; and, should therefore be removed from the Green Belt and allocated for residential led development to meet acute housing needs experienced in the Black Country boroughs.
- 1.4 Set out below is Taylor Wimpey's response to the relevant parts of the BCCS Issues and Options Report Consultation Document [CD]. Relevant question numbers are provided for reference.

## 2.0 **Taylor Wimpey’s Responses to the Consultation**

### **Purpose and Scope of the Review (Question 1)**

- 2.1 Taylor Wimpey supports the BCCS review but considers that the authorities should carry out a full review rather than just a partial review. A vast amount of the data on which the adopted BCCS is based, pre-dates the end of the West Midlands Regional Spatial Strategy period and the adoption of the National Planning Policy Framework [Framework] is therefore out of date.
- 2.2 The country is in the midst of a housing crisis and the Housing White Paper recognises that there is an overwhelming shortfall in the supply of housing across the Greater Birmingham Housing Market Area [GBHMA] which the Black Country must play a key role in addressing. To achieve this, wholesale Green Belt release is required and the BCCS needs to address this as a central and key issue.
- 2.3 The entire strategy should be reviewed to ensure that it is in accordance with the Framework, Planning Practice Guidance [Practice Guidance] and recent High Court Judgements.

### **The Strategic Challenges and Opportunities (Questions 2-6)**

- 2.4 Taylor Wimpey generally agrees with the key issues identified but makes specific comment regarding relevant issues below.

#### **Key Issue 1 – Updating the Evidence Base**

- 2.5 Taylor Wimpey considers that the Key Evidence set out in Table 1 is broadly sufficient to support the BCCS review but notes that the Government is currently proposing material changes to the Framework and Practice Guidance to make the evidence requirements for Local Plans more proportionate<sup>1</sup>. Any such changes may lead to further additional work being necessary for the BCCS to be found sound when examined. Taylor Wimpey therefore reserves the right to make further comment on evidence requirements until such time that more detail is available on the proposed changes to national policy and guidance.

#### **Key Issue 2 – Meeting the Housing Needs of a Growing Population**

- 2.6 The CD identifies a housing need of 78,190 for the Black Country for the period 2014 to 2036; 3,554 dwellings per annum [dpa]. Taylor Wimpey considers that this is insufficient to meet the needs of the Black Country’s growing population and is not in line with national guidance. The ‘Black Country Housing Needs Assessment – Headroom Report’ sets out the basis for this view.
- 2.7 The CD is based upon the March 2017 Strategic Housing Market Assessment [SHMA] which uses the 2014 Sub-National Population Projections [SNPP], with an allowance for vacancy rates and adjustment for past housing under-delivery. Finally the CD uplifts the target by 3,000 dwellings to accommodate some of Birmingham’s unmet housing need. The SHMA has a flawed methodological approach, particularly: the lack of alternative household and populations projections such as using long term migration rates and no sensitivity adjustment for historic low household formation rates in younger age cohorts as required by the Framework [§159] and

---

<sup>1</sup> Housing White Paper [§1.10 and A.19]

Practice Guidance<sup>2</sup>; and an underestimate of the need to increase delivery in response to market signals (as recommended by the Practice Guidance<sup>3</sup> and in recommendations made by the Local Plan Experts Group [LPEG]<sup>4</sup>).

- 2.8 Taylor Wimpey commissioned Lichfields to undertake an independent assessment of the Black Country's OAHN. This involved modelling a number of demographic and economic scenarios to forecast future population and household growth, following the Framework and recommendations of the Practice Guidance and LPEG. This found that the CD significantly underestimates the level of housing required to support the needs of the Black Country's growing population.
- 2.9 A more appropriate and robust OAHN for the Black Country (excluding South Staffordshire) is 4,518 to 5,473 dpa. This is based upon the long term migration trends seen in the Black Country, with an adjustment to household formation rates for younger age cohorts. The OAHN also includes uplifts to each local authority to reflect negative market signals and an increased affordable housing need in Dudley. Finally the OAHN sets out an increased requirement of up to 955 dpa to reflect the Black Country's proportionate 'fair share' of Birmingham's unmet housing need. The 'Black Country Housing Needs Assessment – Headroom Report' provides further detail on the approach and assumptions used to derive this OAHN.

### **Key Issue 3 – Supporting a Resurgent Economy**

- 2.10 The Framework and Practice Guidance make it clear that economic growth needs and housing must align to promote sustainable patterns of development. An imbalance between housing and employment land growth could lead to unsustainable commuting patterns or constrain growth. The Practice Guidance<sup>5</sup> makes clear that economic forecasts must have regard to the growth of working age population within the HMA, and consider demographically derived assessments of future employment needs<sup>6</sup>. This is particularly important as the economic growth ambitions of Birmingham will need to be supported by housing provision in the wider HMA, and the Black Country local authorities have an important role to play in supporting this. The Practice Guidance<sup>7</sup> goes on to say that a failure to agree housing provision as part of the duty to cooperate would result in unmet housing need. The Framework sets out that Local Planning Authorities [LPAs] should ensure that their assessment of strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals [§158].
- 2.11 The BCCS sets out the Economic Development Needs Assessment's [EDNA] recommendations for up to 800 ha of additional employment land to meet the Black Country's B1, B2 and B8 needs for the period 2014 to 2036. Taylor Wimpey welcomes the Black Country's aspirations for economic growth, though further evidence is required to ensure that there is sufficient housing provision to support these ambitions. The EDNA is based solely upon economic led scenarios (past delivery rates and economic growth forecasts) and does not consider the needs arising from anticipated housing growth. Further evidence is therefore required to determine the demographically led need for employment land in the Black Country to ensure that employment land supply and housing provision align, as the CD fails to align with national guidance. This evidence would need to demonstrate the anticipated employment land required to support

---

<sup>2</sup> Practice Guidance Ref: 2a-015-20140306

<sup>3</sup> Practice Guidance Ref: 2a-019-20140306

<sup>4</sup> LPEG (March 2016) Report to the Communities Secretary and to the Minister of Housing and Planning

<sup>5</sup> Practice Guidance Ref: 2a-018-20140306

<sup>6</sup> Practice Guidance Ref: 2a-032-20140306

<sup>7</sup> Practice Guidance Ref: 2a-018-20140306



demographically led scenarios, to ensure that it would not result in an over or under supply of employment land.

- 2.12 Taylor Wimpey welcomes the recognition in the CD that some employment sites may be unfit for purpose and could be considered for alternative uses such as housing. This aligns with the Framework [§22] which states that allocated employment sites for which there is no reasonable prospect of development should not be protected in the long term. Proposals for alternative uses on such sites should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

### **Key Issue 6 – Reviewing the Role and Extent of the Green Belt**

- 2.13 Local planning authorities are currently required by the Framework [§14] to positively seek opportunities to meet the development needs of their area. The Framework [§17] also sets out 12 core planning principles, including how planning should:

*“...proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”*

- 2.14 The Practice Guidance<sup>8</sup> states that the need for housing refers to:

*“...the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.”*

- 2.15 Furthermore, as set out in Housing White Paper, the Government intends to extend the requirement to accommodate housing need to also include *“any needs that genuinely cannot be met within neighbouring authorities.”*

- 2.16 The CD [§3.42] recognises the need to identify new sites outside of the urban area and currently in the Green Belt, to accommodate the housing need of the Black Country. In addition to the housing needs of the Black Country local authorities, any additional identified need from the GBHMA must be accommodated within the Black Country. Housing sites must therefore be released from the Green Belt as there is insufficient available land within the urban areas to meet the requirements.

- 2.17 The Framework [§§83-85] sets out the need to demonstrate ‘exceptional circumstances’ when amending Green Belt boundaries and this is reinforced by the Housing White Paper [§§137-140]. Taylor Wimpey considers that the scale of the housing required and the lack of land outwith the Green Belt constitutes the necessary ‘exceptional circumstances’ to justify that Green Belt land should be released for housing. The local authorities therefore need to provide a sound evidence base which is robust in demonstrating the ‘exceptional circumstances case’ and ensure it complies with the Housing White Paper [§139].

---

<sup>8</sup> Practice Guidance Ref: 2a-003-20140306

<sup>9</sup> Housing White Paper – Page 79: Box 2

- 2.18 In this context, Taylor Wimpey fully supports the carrying out of a Strategic Green Belt Review as this is necessary to ensure sufficient land is provided to meet the Black Country's and GBHMA's objectively assessed housing needs over the course of the plan period.
- 2.19 Taylor Wimpey supports the release of Green Belt sites, including specific allocations for development by 2036 through the Core Strategy review. It is critical that the Green Belt Review process is fully informed by the GBHMA Growth Study and that developers and other stakeholders are fully engaged both in terms of the proposed methodology and any site assessment work.
- 2.20 Call for Sites forms and Development Statements for the sites at Chester Road, Streetly and Bosty Lane, Aldridge are being submitted on behalf of Taylor Wimpey alongside these representations. The Call for Sites submission in relation to Chester Road, Streetly clearly demonstrates that the site no longer fulfils the purposes of including the land within the Green Belt; should be removed from it; and, should be allocated for housing development in the BCCS.
- 2.21 Furthermore, in addition to housing allocations, the BCCS should allocate safeguarded land to provide greater certainty over the Green Belt boundaries beyond the plan period.
- 2.22 Where housing delivery is failing to meet plan requirements, a partial or full plan review should normally be considered to allocate safeguarded land for housing development. However, it is imperative that the BCCS includes clear triggers for such a review to ensure that the plan is transparent and effective.
- 2.23 In accordance with the recommendations of the LPEG Report, the Council should provide a mechanism for the release of developable reserve sites equivalent to 20% of the housing requirement. Taylor Wimpey considers that reserve sites, to be taken out of the safeguarded land supply if certain triggers are met, should be identified in the BCCS. This approach has been taken by other local authorities in adopted Local Plans and such triggers would include the lack of a five year supply or delivery below the housing trajectory. A good example of this is the West Lancashire Local Plan [Policy RS6] which includes the following mechanism for releasing reserve sites after 5 years of the plan, namely:
- “If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the Council will release land from that safeguarded from development...”*
- 2.24 Similar triggers are included in the policy for low delivery after 10 years or if new evidence emerges that the housing requirement should be higher. An extract of the West Lancashire Local Plan [Policy RS6] is included at Annex 1 for reference.

### **Key Issue 9 – Working Effectively With Neighbours**

- 2.25 It is acknowledgement that the Black Country authorities are committed to working in partnership with neighbouring stakeholders and meeting the requirements of the Duty to Co-Operate set out in the Framework. However, significant emphasis should be put on the Black Country's role and responsibility for meeting any unmet housing need from the Greater Birmingham Housing Market Area [GBHMA].
- 2.26 Any additional identified need from the GBHMA must be accommodated within the Black Country and additional sites allocated for housing.

## **Reviewing the Strategy to Meet New Challenges and Opportunities**

### **Vision, Principles, Spatial Objectives and Strategic Policies (Questions 7-9)**

- 2.27 It is considered that the BCCS vision and sustainability principles remain generally appropriate as they reflect the sustainability principles of the Framework and Practice Guidance. Taylor Wimpey however, reserves the right to make further comment on the specific wording at subsequent stages of consultation on the BCCS.
- 2.28 It is considered that the BCCS spatial objectives remain generally appropriate but an obvious omission is a specific objective for providing the necessary level of housing in the Black Country, including any unmet housing need from the GBHMA. Such an objective should be added and other relevant objectives (i.e. 1 and 8) also amended to reflect the need to provide sufficient high quality housing in the locations where it is needed.
- 2.29 Taylor Wimpey agrees that policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the growth network. In particular, the policies will need to reflect and provide for adequate levels of housing based on robust evidence and including any additional identified need from the GBHMA.

## **Reviewing the Spatial Strategy**

### **Stage 1: Strategic Options 1A and 1B – Continuing the Role of the Growth Network (Questions 10 and 11)**

- 2.30 The adopted BCCS spatial strategy focussed on the Growth Network, which was identified as having the ability to meet the ‘majority of long term development needs’ [BCCS §4.11]. Taylor Wimpey agreed that the Growth Network no longer has the ability to meet the majority of long term development needs and the CD identifies two strategic options to meeting the housing and employment requirements.
- 2.31 Strategic Option 1A would seek to meet all remaining housing and employment land growth needs outside the Growth Network, whilst Strategic Option 1B would seek to re-structure the Growth Network, releasing some existing employment land for housing within regeneration corridors.
- 2.32 The CD makes it clear that Option 1B would be ‘very challenging’ [§§4.18-4.20] and acknowledges that despite the previous aim to shrink the stock of employment land, the employment land stock has proved to be more resilient than predicted and sites have proved difficult to bring forward for housing [CD §5.19]. The adopted BCCS planned for a contraction in net employment land but there is now a recognised need to increase employment land stock. If any employment land were to be redeveloped for housing within the regeneration corridors, or any amendments to any regeneration corridor boundaries were proposed, the local authorities will need to ensure that any proposed development sites were sustainable and viable.
- 2.33 Further work is therefore required in order to assess the feasibility of Option 1B in terms of whether it would be viable and/or sustainable and determine how much employment land would realistically be available and developable for housing.
- 2.34 Any employment land displaced under Option 1B would need to be made up elsewhere [CD §4.19]. Therefore, whilst Taylor Wimpey does not object to the retention of the Growth

Network, there is a need to provide additional land to accommodate the housing needs of the Black Country and the unmet needs of the GBHMA. The CD identifies that further land will be required to provide 22-25,000 new homes and up to 300ha of new employment land [§4.12]. Additionally, analysis undertaken by Lichfields indicates that the BCCS proposals to accommodate 3,000 dwellings of Birmingham's unmet needs significantly underestimates the proportionate 'fair share' expected of the Black Country based on the size of its population. The requirement could be as high as 955 dpa, though it is recognised that more recent evidence is needed to determine the feasibility of distributing Birmingham's unmet need across the wider GBHMA.

- 2.35 There is a clear and unquestionable need to provide significant amounts of housing land outwith the Growth Network within the Green Belt. Therefore the BCCS must identify and allocate suitable sites for release from the Green Belt for housing development, whichever strategic option is pursued. Taylor Wimpey however broadly supports Option 1A.

### **Stage 2: Strategic Options 2A and 2B – Housing and Employment Outside the Urban Area (Questions 12-20)**

- 2.36 There is inadequate land within the Black Country urban area to meet emerging employment and housing needs and there is also a pressing need to assist Birmingham in meeting its acute housing shortfall. Additionally an independent assessment of the Black Country's OAHN indicates a much higher requirement than that proposed by the BCCS (further details are provided in the 'Black Country Housing Needs Assessment – Headroom Report'). This need cannot be met within the existing urban area of the Black Country and therefore exceptional circumstances exist to justify the release of enough sites from the Green Belt to boost the supply of housing to meet the identified needs.
- 2.37 The CD identifies two spatial housing options to achieve this, namely 'rounding off' (Spatial Option H1) and Sustainable Urban Extensions [SUEs] (Spatial Option H2).
- 2.38 Taylor Wimpey considers that strategic scale Sustainable Urban Extensions [SUE] would normally comprise approximately 700 or more dwellings and provide new strategic social and physical infrastructure such as major highways improvements, and community healthcare and education facilities such as GPs practices or schools. Sites of around 300-700 dwellings may also constitute SUEs where they would provide substantial elements of social and physical infrastructure but not to the same scale as strategic SUEs.
- 2.39 Allocating SUEs of different scales across the Black Country could contribute to a mix of uses and a wide range of house types to significantly boost the supply of housing and could provide for significant investment in new infrastructure. However, relying only on very large scale sites to deliver the housing needed would have associated risks. Strategic scale sites often have more complex issues associated with them such as multiple ownerships and/or significant infrastructure requirements, which can restrict and/or delay delivery. Releasing smaller sites would help promote choice and opportunity for those in need of housing and also for developers to ensure that sustainable developments in the right locations will be viable and actually delivered. Smaller sites would need to be largely supported by existing infrastructure but could also contribute improvements to and therefore boost the existing local infrastructure in appropriate sustainable locations.
- 2.40 Taylor Wimpey therefore considers that there is merit in both Spatial Options H1 (rounding off) and H2 (Sustainable Urban Extensions) and therefore the most appropriate overall spatial approach in the BCCS should be to combine the two approaches. Specifically, the local

authorities should identify deliverable and viable sites of all range of sizes, in sustainable locations where the size of the site and range of house types can reflect the local need for housing and the character of the area.

- 2.41 The critical challenge facing the Black Country is that whichever approach is adopted, large areas of the Green Belt are required for housing. Any site released from the Green Belt for housing would need to be available, suitable, achievable and viable and well related to existing patterns of development. All sites will also need to be assessed and those which would cause the least harm to Green Belt purposes. The Black Country Green Belt Review (due to be published in 2019) is therefore a crucial piece of work to identify sustainable sites which can be allocated for housing in the BCCS.
- 2.42 In this context, Call for Sites submissions relating to land at Chester Road, Streetly, and Bosty Lane, Aldridge accompany these representations and set out how each site would; provide a sustainable location for residential development; no longer contribute to Green Belt purposes; and, should therefore be removed from the Green Belt and allocated for residential development.
- 2.43 Taylor Wimpey objects to the suggestion that the Black Country's housing growth could be exported to neighbouring authorities for a number of reasons:
- 1 The OAHN should be fully met within the Black Country HMA to meet the needs of its residents and its growing population. However it is recognised that HMAs do not align precisely with local authority boundaries and there are grey areas at the margins in particular. As such, there can be overlaps between HMAs and there are situations where sites fall within multiple HMAs. For example the wider Black Country & South Staffordshire HMA has some overlap between the LPAs of Wolverhampton and South Staffordshire. In such situations where sites abut the borders of HMAs and are well related and accessible to settlements in adjoining districts, they can practically help meet some of the neighbouring needs whilst also meeting the needs of their HMA.
  - 2 The nearby areas in the GBHMA cannot accommodate additional housing growth; for example Birmingham is already looking to neighbouring authorities to accommodate its growth. It is therefore unfeasible to expect neighbouring authorities to also accommodate the needs of the Black Country HMA.
  - 3 As detailed in the 'Black Country Housing Needs Assessment – Headroom Report' there is a significant need for housing growth in the Black Country HMA, above the target proposed by the CD. Homes need to be built in locations that meet the needs of the residents living within and moving to the Black Country HMA. Additionally the Black Country HMA has an important role to play in helping to accommodate the unmet needs of Birmingham that must be shared by neighbouring authorities. Housing growth must be physically accommodated somewhere and it is not realistic or feasible for the Black Country HMA's needs to be exported to neighbouring authorities, particularly in addition to Birmingham's needs being exported.
  - 4 The CD does not provide sufficient evidence to demonstrate that it would not be able to accommodate its housing growth needs within the Black Country HMA.
- 2.44 Taylor Wimpey considers that there are sufficient sites and locations within the Black Country to accommodate housing growth and sustainable development, albeit not within the existing urban area.
- 2.45 Taylor Wimpey considers that exporting housing needs would not be realistic as it would primarily rely upon increased levels of commuting. This would fall on journeys by car,

increasing traffic flows between authorities within and outside the Black Country HMA. This is considered to be both unsustainable and undesirable, exacerbating existing pressures on the road network. The proposed Wednesbury to Brierley Hill Metro extension is expected to be open for passenger services in 2023, providing connectivity to regional and national rail services and Dudley Town Centre<sup>10</sup>. The Metro extension would improve capacity, journey times and accessibility for residents and people working in Dudley and Sandwell.

- 2.46 Whilst Taylor Wimpey does not wish to comment in detail on the spatial options for accommodating employment land growth, it notes that the Practice Guidance<sup>11</sup> requires that potential job growth is considered in the context of potential unsustainable commuting patterns and as such plan-makers should consider how the location of new housing could help address this. Ensuring a sufficient supply of homes within easy access of employment sources represents a central facet of any efficiently functioning economy and can help to minimise housing pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions).

## **Delivering Growth – Infrastructure and Viability**

- 2.47 The local authorities should ensure that any proposed changes to policy DEL1 accord with the Framework [§§173-177] and do not place any unnecessary additional burden on smaller development sites as a result of attempting to be applicable to SUEs. Requirements relating to infrastructure needed in association with SUEs could be detailed in a separate policy or policies specific to each SUE.
- 2.48 Taylor Wimpey reserves the right to provide a further response on any changes to policy DEL1 or other policies dealing with infrastructure requirements at later stages of the preparation of the BCCS.

## **Social Infrastructure (Questions 22-25)**

- 2.49 Taylor Wimpey does not have any specific comments to make on social infrastructure at this time but accepts that new social infrastructure is often required in relation to housing developments in order to achieve sustainable, high quality development. However, the local authorities must ensure that the BCCS accords with the Framework [§§173-177] and does not place unnecessarily burdensome requirements on developments to the point that viability and deliverability is impacted. Taylor Wimpey reserves the right to comment on such issues at the next stage of preparing the BCCS.

## **Physical Infrastructure (Questions 26-28)**

- 2.50 Taylor Wimpey does not wish to make detailed comments on physical infrastructure at this time but accepts that new physical infrastructure is often required in relation to housing developments in order to achieve sustainable, high quality development. However, the local authorities must ensure that the BCCS accords with the Framework [§§173-177] and does not place unnecessarily burdensome requirements on developments to the point that viability and deliverability is impacted. Any infrastructure requirements should be proportionate to the scale of development proposed. Taylor Wimpey notes that the requirement of new physical infrastructure to serve any needs should be based on robust evidence.

---

<sup>10</sup> <http://www.metroalliance.co.uk/wednesbury-brierley-hill/>

<sup>11</sup> Practice Guidance Ref: 2a-018-20140306

- 2.51 Taylor Wimpey reserves the right to comment on such issues at the next stage of preparing the BCCS.

### **Delivery and Viability (Questions 29-30)**

- 2.52 The CD [§§5.22-5.23] states that the Black Country has a good track record of working with developers to address viability issues and deliver sites and that delivery work will be undertaken in relation to Green Belt sites to understand what is required to make them viable and deliver the necessary infrastructure. A pro-active approach to ensure that any sites released from the Green Belt are viable and deliverable is welcomed.
- 2.53 In terms of the possible impacts of Green Belt release on the deliverability of brownfield sites, Taylor Wimpey notes that the Housing White Paper sets out clear policy proposals which the Council needs to consider in terms of ensuring that its Local Plan evidence base is robust. This includes the Housing Delivery Test [Housing White Paper §1.10] and a need to ensure that it has examined fully all other reasonable options when considering the release of land from the Green Belt [Housing White Paper §1.39-1.40].
- 2.54 Taylor Wimpey reserves the right to comment on the appropriateness of infrastructure delivery mechanisms either through conditions, planning/highway obligations or CIL until the Government provides further advice following the publication of the White Paper and any amendments to CIL and S106 obligations which are anticipated in the Autumn Budget.

### **Funding for Site Development and Infrastructure (Question 31)**

- 2.55 The mechanisms listed in the CD [§§5.35-5.38], for funding infrastructure associated with developments are considered appropriate.
- 2.56 Taylor Wimpey does not wish to comment on the specific sources of funding to make developments viable [CD §§5.26-5.32] but notes that 25% of the existing Black Country housing land supply is not viable under current market conditions [CD §5.28]. The CD states that the sources of funding identified 'should' provide enough support to ring forward a sufficient supply of land to meet short to medium term needs as set out in the existing local plan [§5.32]. However, housing needs in excess of those in the existing BCCS have now been identified including additional need from the GBHMA and the release of Green Belt land is needed to meet those needs. If the identified sources fail to deliver the anticipated level of funding, there will be extra pressure for viable and deliverable sites to provide for the increased levels of housing need.
- 2.57 It is essential therefore that viable, deliverable Green Belt sites are allocated through the BCCS and the local authorities should also consider identifying further safeguarded land as set out in the Framework [§85] in order to meet development needs stretching well beyond the plan period (see §§2.21- 2.24 above).

## **Review of Existing Core Strategy Policies and Proposals**

### **Policy Area A – Health and Wellbeing (Questions 32-34)**

- 2.58 Taylor Wimpey does not have any specific comments to make on health and wellbeing at this time but in terms of design features of new developments, the local authorities must ensure that the BCCS accords with the Framework [§§173-177] and does not place unnecessarily burdensome requirements on developments to the point that viability and deliverability is

impacted. Taylor Wimpey reserves the right to comment on such issues at the next stage of preparing the BCCS.

## **Policy Area B – Creating Sustainable Communities in the Black Country (Questions 35 – 48)**

### **HOU1 – Housing Land Supply**

- 2.59 The Framework [§47] is clear that there is a need to boost significantly the supply of housing in order to deliver a wide choice of high quality homes and ensure that Local Plans meet the full and objectively assessed needs for market and affordable housing in the relevant housing market area.
- 2.60 The BCCS should plan for a level of housing growth to support the economic aspirations of the local authorities, align with their growth objectives, and accommodate the unmet need from the GBHMA. The local authorities should ensure that the relevant evidence base documents and studies have regard to each other, and that the objectively assessed need [OAN] for employment land is aligned with the OAN for housing. Demand for housing land and demand for employment land are inherently linked, and provision of both should be well planned and promote sustainable travel.
- 2.61 There are substantial negative economic and social implications of not providing sufficient housing to meet identified needs and demand. It is therefore crucial that enough housing land is allocated in the BCCS for residential development.
- 2.62 In order to ensure robustness and flexibility, the BCCS must ensure that the local authorities are able to demonstrate a deliverable 5 year supply of housing land throughout the life of the plan. It is therefore important that the spatial distribution of development allows all sites identified for development to conform with the deliverability criteria set out in the Framework [§47 and footnote 11].
- 2.63 Taylor Wimpey has not carried out a detailed assessment of any sources of supply or had the opportunity to review any evidence on which the housing supply in the BCCS will be based but notes that the housing target for the new plan period (2014-36) will be established through the BCCS review. Taylor Wimpey therefore reserves the right to comment on these issues at a later stage but notes that the BCCS will need to accord with the Framework [§47] and meet the full, objectively assessed needs for market and affordable housing in the housing market area. In particular:
- 1 Any sites identified in the BCCS land supply will need to meet the tests set out at footnotes 11 and 12 of the Framework and if a small sites windfall allowance is to be included, it must be based on robust evidence of past delivery of such sites;
  - 2 The CD [§6.22] proposes a reduction in the levels of discount for non-delivery on sites within the Growth Network. Taylor Wimpey notes that the levels of discount should not be reduced unless robust evidence on past delivery can be presented in support of this. The housing needs of the Black Country and GBHMA can only be met by releasing sites from the Green Belt, outside of the growth network where there will be less certainty and therefore an appropriate discount is necessary; and,
  - 3 The housing requirement in the BCCS should be treated as a minimum rather than a maximum figure and an adequate surplus should be provided to give flexibility to deal with changing circumstances as required by the Framework [§153].



2.64 In summary, the BCCS must provide the necessary land to accommodate both the housing needs of the Black Country and the additional need from the GBHMA. The BCCS must also provide flexibility to deal with changing circumstances as required by the Framework [§153] and for the longer term needs of the Black Country. The local authorities therefore need to identify significant amounts of Green Belt land and allocate sites such as those at Bosty Lane, Aldridge and Chester Road, Streetly, through the BCCS.

### **HOU2 – Housing Density, Type and Accessibility**

2.65 Taylor Wimpey supports parts of the existing text to policy HOU2 in so much as it recognises that the density and type of new housing provided on each site will be informed by:

- 1 The need for a range of types and sizes of accommodation to meet identified sub regional and local needs;
- 2 The level of accessibility by sustainable transport to residential services, including any improvements to be secured through development; and,
- 3 The need to achieve high quality design and minimise amenity impacts, taking into account the characteristics and mix of uses in the area where the proposal is located.

2.66 Taylor Wimpey supports the removal of the final paragraph of policy HOU2 [CD §6.28] which currently requires local plan documents to prescribe the density and house type mix for each allocation.

2.67 The Housing White Paper signals the Government’s intention to minimise the use of local standards (through the Housing Standards Review) and therefore Taylor Wimpey does not support accessibility standards applied on a ‘blanket’ policy basis as this can lead to viability issues on developments.

2.68 Higher density development will be more appropriate in town centres and close to public transport nodes and local services but the current policy wording was adopted in the context of a spatial strategy which did not require substantial Green Belt release, as is now required. The policy should be updated to allow for the density and house type mix of any housing development site should reflect the local context in which the site is located.

2.69 The balance of new housing types and sizes should be based on an appropriate evidence base such as the 2017 SHMA findings. It is important however to also maintain a degree of flexibility to respond to changing local circumstances and more up-to-date evidence as time goes on.

2.70 Taylor Wimpey would not support a policy requirement for serviced plots on large housing sites if it threatened the viability and/or deliverability of the site. If such a requirement was introduced, there must be a mechanism to relax the requirement if it proved to not be viable on any given site.

2.71 Taylor Wimpey reserves the right to make more detailed comments on the specific wording of policy HOU2 at future stages in the preparation of the BCCS.

### **Policy HOU3 – Affordable Housing**

2.72 The Council is querying whether the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment. Such an increase should only occur if the SHMA is robust.

2.73 Taylor Wimpey generally supports the provision of affordable housing, particularly in light of the Housing White Paper which sets out the Government’s commitment to helping to support

people to buy their own homes. Taylor Wimpey is supportive of the inclusion of starter homes as defined affordable housing provision and the Council should amend any evidence within the SHMA to meet emerging National Guidance. The White Paper [§4.15] states that there is a desire to deliver starter homes as part of a mixed package of affordable housing that can respond to local needs and markets.

2.74 The threshold in Policy HOU3 of sites of 15 or more dwellings should be reduced to sites of 11 or more dwellings to reflect the Practice Guidance<sup>12</sup> and ensure that all major housing development proposals that can contribute to the provision of affordable housing, do contribute, particularly if the overall annual affordable homes target is increased.

2.75 Taylor Wimpey strongly objects to the proposal to increase the affordable housing requirement on future Green belt release sites. The 25% affordable housing requirement on private housing sites should not be increased, nor should a higher requirement set for Green Belt release housing sites, unless robust evidence shows that this would be viable and deliverable. The local authorities must ensure that the BCCS accords with the Framework [§173-177] and does not place unnecessarily burdensome requirements on developments to the point that viability and deliverability is impacted. In any case therefore, the final paragraph of Policy HOU3 must be retained so that on sites where the policy requirement for affordable housing is proven not to be viable, the maximum proportion of affordable housing will be sought which will not undermine the development's viability.

#### **Policy HOU5 – Education and Health Care Facilities**

2.76 If Policy HOU5 were to be expanded to include any other types of built social infrastructure, they would need to be adequately evidenced and viability tested to ensure that they would not place additional burdens on housing development sites to the point that viability and/or deliverability is threatened.

2.77 Taylor Wimpey reserves the right to comment further on this matter and any specific policy wording at subsequent stages in the preparation of the BCCS.

### **Policy Area B – Creating Sustainable Communities in the Black Country (Question 49)**

#### **Policy DEL2 – Managing the Balance between Employment Land and Housing**

2.78 Taylor Wimpey does not wish to provide detailed comments at this point on whether policy DEL2 should be retained and/or amended as this will depend largely on the overall spatial strategic and strategic option pursued. Taylor Wimpey reserves the right to comment further on this matter and any specific policy wording at subsequent stages in the preparation of the BCCS.

### **Policy Area F – The Black Country Environment (Questions 94-103)**

#### **Policies CSP3 and CSP4 - Environmental Infrastructure and Placemaking**

2.79 The proposed changes to Policies CSP3 and CSP4 set out in the CD [§6.1.46] are supported as they will simply make the policies consistent with the local authorities' adopted Development Plan Documents.

---

<sup>12</sup> Practice Guidance Ref: 23b-031-20161116

- 2.80 If Garden City principles were to be introduced they would need to be fully viability tested so as not to threaten the viability and/or delivery of housing sites.
- 2.81 Taylor Wimpey reserves the right to make further detailed comments on the specific wording of these policies at subsequent stages in the preparation of the BCCS.

### **Policy ENV3 Design Quality**

- 2.82 Taylor Wimpey agrees with the proposed change to Policy ENV3 to remove the requirement to meet Code for Sustainable Homes Level 3 or above for residential development as this no longer accords with national policy and guidance.
- 2.83 Taylor Wimpey acknowledges the need to provide accessible accommodation but given the Government's intention to minimise the use of local standards (through the Housing Standards Review), Taylor Wimpey would not support the introduction of any additional accessibility standards introduced on a 'blanket' policy basis as this would lead to viability issues on developments. The same would be true for water consumption and space standards. The BCCS must accord with the Framework [§§173-177] and not place unnecessarily burdensome requirements on developments to the point that viability and deliverability is impacted.
- 2.84 Taylor Wimpey reserves the right to comment on these issues at the next stage of preparing the Local Plan.

### **ENV5 Flood Risk, Sustainable Drainage (SuDS) and Urban Heat Island Effects**

- 2.85 Taylor Wimpey generally supports the proposed change to policy ENV5 to prioritise natural green space SuDS where it is "practical and viable" [CD §6.1.58]. The BCCS should also go further and define what is meant by 'practical' (i.e. where natural green space SuDS would not prevent the efficient use of land or achieving an overall high quality, well designed development).
- 2.86 Taylor Wimpey reserves the right to make further detailed comments on the specific wording of these policies at subsequent stages in the preparation of the BCCS.

### **ENV7 – Renewable Energy**

- 2.87 Taylor Wimpey acknowledges and agrees with the recognition [CD §6.1.64] that any change to the % requirement would need to be justified with evidence. Taylor Wimpey therefore reserves the right to make further comment on any changes proposed at subsequent stages of the preparation of the BCCS.

### **Policy Are J – Growth Network Detailed Proposals (Question 117)**

- 2.88 Taylor Wimpey agrees in principle with the proposed approach of updating and amending Appendix 2 and Tables 2 and 3 of the existing Core Strategy but reserves the right to make further comment on any specific changes proposed at subsequent stages of the preparation of the BCCS.

### **Policy Area K – Monitoring and Additional Policies (Question 118-119)**

- 2.89 Taylor Wimpey supports the proposals to streamline and simplify the Core Strategy Monitoring Framework and focus on the key quantitative indicators, in particular 'net new homes'.
- 2.90 There is a clear and over-riding need to release sites from the Green Belt to meet the housing needs of the Black Country and GBHMA. Taylor Wimpey fully supports the recognition that a

new section in the BCCS should allocate specific Green Belt sites for housing development [CD §6.2.6]. Taylor Wimpey reserves the right to make further detailed comments on such a section and the policies it contains at subsequent stages in the preparation of the BCCS.

## 3.0 Conclusion

- 3.1 These representations form Taylor Wimpey's response to the Black Country Core Strategy Review Issues and Options Consultation.
- 3.2 Taylor Wimpey welcomes the review of the BCCS and the pro-active approach being taken by the Council to ensure that the Local Plan is up-to-date.
- 3.3 The CD significantly underestimates the level of housing needed to support future population growth in the Black Country, as well as underestimating its responsibility to accommodate Birmingham's unmet needs. This is a result of the flawed methodological approach taken by the SHMA. An independent assessment of OAHN undertaken by Lichfields indicates that the actual need is 4,518 to 5,473 dpa. This is based upon the high levels of migration seen in the Black Country over the long term, the need to adjust household formation rates for younger age cohorts, and an uplift to reflect market signals on house prices, affordability and concealed families. Additionally the OAHN range includes an allowance of up to 955 dpa to accommodate Birmingham's unmet need, based on the Black Country's proportionate 'fair share'. Further details are provided in the 'Black Country Housing Needs Assessment – Headroom Report'.
- 3.4 The scale of the housing required in the Black Country and GBHMA, along with the lack of sufficient land outwith the Green Belt constitutes the necessary 'exceptional circumstances' to justify that Green Belt land should be released for housing. The Council therefore needs to provide a sound evidence base which is robust in demonstrating the 'exceptional circumstances case'.
- 3.5 Taylor Wimpey therefore fully supports the carrying out of a Strategic Green Belt Review as this is necessary to ensure sufficient land is provided to meet the Black Country's objectively assessed housing needs over the course of the plan period.
- 3.6 Informed by this process, sufficient Green Belt land should be released and allocated for housing development to meet the needs of the Black Country and GBHMA.
- 3.7 In this context call for Sites forms and Development Statements for the sites at Chester Road, Streetly and Bosty Lane, Aldridge are being submitted on behalf of Taylor Wimpey alongside these representations. The Call for Sites submissions clearly demonstrates that the sites no longer fulfil the purposes of including the land within the Green Belt and should be removed from it and allocated for housing development in the BCCS.
- 3.8 Taylor Wimpey requests to be kept informed of any developments in the preparation of the BCCS and any opportunities to make further representations to later stages.

**Bristol**  
0117 403 1980  
bristol@lichfields.uk

**Cardiff**  
029 2043 5880  
cardiff@lichfields.uk

**Edinburgh**  
0131 285 0670  
edinburgh@lichfields.uk

**Leeds**  
0113 397 1397  
leeds@lichfields.uk

**London**  
020 7837 4477  
london@lichfields.uk

**Manchester**  
0161 837 6130  
manchester@lichfields.uk

**Newcastle**  
0191 261 5685  
newcastle@lichfields.uk

**Thames Valley**  
0118 334 1920  
thamesvalley@lichfields.uk