

From: [REDACTED]
Sent: 08 September 2017 12:04
To: Blackcountrycorestra
Cc: [REDACTED]
Subject: BIR5060: BCCS Response on behalf of Taylor Wimpey UK Ltd (Email 1 of 3)
Attachments: BIR.5060_3_BCCSIO_App1RevA.pdf; BIR5060_BCCSIO_FINAL_080917.pdf

Dear Sir/Madam,

I am instructed by Taylor Wimpey UK Ltd to submit representations on their behalf to the current Black Country Core Strategy Review Issues and Options consultation. These representations relate to land off Linthouse Lane, Wolverhampton, where Taylor Wimpey has secured an interest. The representations should be considered alongside information submitted separately through the call for sites process.

It is understood that you have a 5MB limit on any submission – therefore the remaining appendices to this representation will be sent via separate emails due to the size of the attachments. In addition, a hard copy of the representation will be placed in the post.

I would be grateful if you could confirm receipt and keep me informed in any future milestone in progressing the review process.

Kind regards

[REDACTED]
Director

Pegasus Group

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ISSUES AND OPTIONS RESPONSE

BLACK COUNTRY CORE STRATEGY REVIEW

LAND OFF LINTHOUSE LANE, WOLVERHAMPTON

ON BEHALF OF TAYLOR WIMPEY UK LTD



**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: BLACK COUNTRY HOUSING NEEDS REPORT (LICHFIELDS)

APPENDIX 3: SITE AND CONTEXTUAL ANALYSIS PLAN

APPENDIX 4: ILLUSTRATIVE MASTERPLAN

1. INTRODUCTION

- 1.1 These representations are made on behalf of Taylor Wimpey UK Ltd (hereafter referred to as 'Taylor Wimpey') to the Black Country Core Strategy Issues and Options document (June 2017). This representation relates to land north of Linthouse Lane, Wolverhampton (see Site Location Plan at **Appendix 1**) which is a site where Taylor Wimpey has secured an interest.
- 1.2 This site is approximately 148 hectares and straddles the administrative boundaries of both Wolverhampton City and South Staffordshire District. The land budget between the two local planning authorities is demonstrated on the Site Location Plan attached at **Appendix 1**.
- 1.3 This representation responds to the emerging policies and allocations, having regard to the national and local policy context. The representations also provide comment in respect of the evidence base that underpins the Black Country Core Strategy Review and the options identified.
- 1.4 In addition, the representations provide further evidence to demonstrate land off Linthouse Lane to be available, suitable and deliverable and introduce Taylor Wimpey's initial proposal for the site, as set out in an illustrative masterplan attached at **Appendix 4**.
- 1.5 The representations are framed in the context of the requirements of the Black Country Core Strategy to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 182. For a Plan to be sound it must be:
- **Positively Prepared** – the plan should be prepared based on the strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its plan period and based on effective joint working on cross boundary strategic priorities; and

- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.5 The representations also have regard to the Government’s recently published White Paper¹ which places emphasis on planning for the right number of homes in the right places, in particular making enough land available and assessing housing requirements.

¹ DCLG (February 2017) Fixing Our Broken Housing Market

2. PURPOSE AND SCOPE OF REVIEW

2.1 The Black Country Authorities are currently at the very early stages of a Local Plan Review to establish an up to date policy framework to guide development in across the Black Country to 2036. The Council's decision to review the currently adopted Core Strategy is fully supported by Taylor Wimpey to ensure:

- The housing requirement is aligned to the most up to date information, including household and economic projections;
- Planning policies and proposals are fully consistent with recent changes in legislation and the National Planning Policy Framework;
- The local plan is up to date, reflecting Government guidance that plans should be regularly reviewed and the evidence base renewed to respond to changing needs within the District.

2.2 It is recognised that the emerging Local Plan, once adopted, will replace the existing Black Country Core Strategy. The new Core Strategy is intended to cover the period 2014-2036 and will establish how much development is required and how development requirements will be distributed across the Black Country. Further comment in respect of the overall growth requirements and spatial distribution of this growth are set out within these representations.

2.3 A Plan period to at least 2036 is generally supported by Taylor Wimpey to provide a long-term development strategy covering at least 15 years from the date of adoption, providing certainty through a plan-led system. This satisfies national guidance set out at paragraph 157 of the NPPF that states "*crucially, Local Plans are to be drawn up over an appropriate timescale, preferably a 15 year time horizon, taking account of longer term requirements, and to be kept up to date.*" A plan period of at least 15 years gives certainty to the development industry and other organisations concerned with the delivery of infrastructure as to how, where and when land will come forward and provides clarity to local residents and employers.

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?*

- 2.4 In response to Question 1 and whether it should be a partial review or not, whilst the existing strategy identifies the most sustainable locations for growth in the context of delivering development requirements identified by the Regional Strategy (RS), there is now a new and much bigger challenge ahead in meeting the arising needs for homes identified by the latest evidence and there is concern that the existing spatial strategy may not facilitate the delivery of these needs. The Black Country authorities, therefore, need to be mindful of this and not attempt to put *"a square peg in a round hole."*
- 2.5 It is our view that urban regeneration can be achieved whilst pursuing development on the urban edge. Indeed, the scale of housing need is so large that both must be encouraged in order to meet current and arising housing needs within the Black Country.
- 2.6 It is extremely important that in reviewing the Core Strategy it fully takes account of and facilitates the delivery of strategic economic plans, as recognised in paragraph 1.15. All too often these strategies are ignored and, accordingly, development plans could effectively frustrate economic growth from being realised.
- 2.7 In terms of the Plan period proposed in paragraph 1.17, whilst a 15-year time period from adoption is appropriate, there is concern that the preparation of plans is often delayed (due to reasons beyond the control of the LPAs) and it may be prudent to stretch the period further to prevent such an issue from occurring.
- 2.8 It is welcomed that the Issues and Options document recognises that it will not be possible to accommodate all future development needs within the urban area and that an examination of the potential for development land outside the existing urban area, which is effectively land within the Green Belt, will take place as part of the Core Strategy review process.

3. THE BLACK COUNTRY TODAY – THE EXISTING STRATEGY

- 3.1 As set out within this section, the delivery of both employment and housing land has not come forward as originally envisaged in part due to the after effects of the recession. Surplus employment land which might have been available for housing has not come forward due to a strengthening economy and local firms being more robust than anticipated. In addition, the range of locations available has not in all cases met with market expectations as to where people want to live.
- 3.2 In terms of the employment land, it is important that sufficient land is provided for new employment and that there is not an overreliance on land that is currently in use. It is impressive that despite generally poor economic performance local businesses have performed well. Should the economy significantly improve within the Plan period in line with LEP aspirations (considered later in this response), there is concern that it may become difficult to transfer existing employment locations to housing allocations. It is appropriate, therefore, for the Council to ensure the evidence contained in the Strategic Housing and Employment Land Availability Assessment is reviewed and updated regularly. This will enable the land supply to be responsive to arising needs and not rigidly be wedded to delivering commitments that are unlikely to be realised.
- 3.3 What is further emphasised by the analysis in this section is that urban regeneration cannot be delivered quickly and that there are a number of factors beyond the control of the Black Country authorities that may have implications on the delivery of the strategy. This further emphasises the need for a mix of types of sites (brownfield, brownfield compulsory purchase, greenfield and Green Belt) of different forms of development (high density, mid and low density family homes) in a variety of locations, which will maximise the opportunities to deliver a successful Local Plan.
- 3.4 Finally, in respect of the proposal to maintain 300 hectares of employment land that will become vacant by way of general churn over the Plan period. Whilst the principle is considered acceptable, there should be appropriate evidence to support the assumption.
- 3.5 Our experience is that there are employment sites that clients are looking to secure a residential allocation on that have not been identified thus far. In light of these changing circumstances, the Black Country authorities should ensure

that the policy approach is flexible to allow sites in appropriate locations to be brought forward for housing throughout the Plan period and likewise, sites that have been allocated for housing but have not come forward should be removed from the supply.

4. THE STRATEGIC CHALLENGES & OPPORTUNITIES

- 4.1 It is welcomed that the Black Country authorities are updating their evidence base. Indeed, the adopted Core Strategy took the development requirements from the adopted Regional Strategy (RS), which has since been revoked and is unquestionably out of date. Since the RS was published there have been a number of population and household projections published showing increasing dwelling requirements in the Black Country, which were largely ignored and, therefore, it should come as no surprise that there is a significant increase in forming households.
- 4.2 In terms of the list of evidence either prepared or due to be completed, it appears to be sufficiently comprehensive.
- 4.3 A separate review of the Objectively Assessed Housing Need (OAHN) has been undertaken by Lichfields on behalf of Taylor Wimpey (**Appendix 2**) which identifies the following conclusions:
- 3,545 dpa equates to the 2014-based SNHP. With suitable adjustments to include an allowance for second/vacant homes; the latest 2016 MYE; and necessary adjustments being made to headship rates in the younger age categories, this would generate a need for 4,077 dpa. Factoring in long term migration rates would increase this further to **4,201 dpa** (4,057 dpa without South Staffordshire). It is considered that this represents the suitable demographic starting point for the Black Country HMA.
 - A modest worsening of some market signals and consistent under-delivery of housing in the Black Country HMA suggests the need to improve affordability to stabilise increasing house prices and high affordability ratios. This would justify an uplift to the figures over and above the level suggested by the demographic projections. The Practice Guidance²³ states that this should be set at a level which could be reasonably expected to improve affordability. A modest 10% uplift is considered appropriate in this instance. Applying this level of uplift to the demographic starting point would indicate a minimum demographic OAHN of **4,622 dpa** (4,462 dpa without South Staffordshire).
 - The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need over and above the OAHN figure for Dudley and South Staffordshire. It is considered that to make a meaningful contribution to addressing the level of affordable housing need

identified by the SHMA (770 dpa), a further 10% uplift should be applied. This would increase the OAHN to **4,692 dpa** (4,518 dpa without South Staffordshire); significantly above the SHMA's proposed OAHN of 3,824 dpa and the CD proposed target of 3,554 dpa.

- In addition to the Black Country HMA's OAHN there is a need to accommodate Birmingham's unmet housing need. The CD proposes to accommodate 3,000 dwellings of Birmingham's needs up to 2031. However, a proportionate 'fair share' approach based on the population distribution across the wider HMA, and accounting for fixed commitments made by Solihull, North Warwickshire and Stratford on Avon, suggests that the Black Country HMA should accommodate up to 20,931 dwellings for the period to 2031 (19,107 without South Staffordshire). This equates to an additional 1,047 dpa above the OAHN, giving a revised OAHN of **4,692 dpa to 5,473 dpa** (4,518 dpa to 5,473 dpa without South Staffordshire).

4.4 In addition, consideration of the Housing Background Report is also contained in set out below. Taylor Wimpey's comments are as follows:

- Clearly a lot of work is yet to be done to determine what the housing land supply position is in the Black Country. Given that much of the existing evidence is based on the adopted Core Strategy, it is recognised that the SHLAAs across the four authorities will need to be updated, both in terms of revising the methodology and range of sites assessed, to reflect a potentially different approach to locating development.
- It is commendable that the Housing Background Report has examined existing sources of supply in an attempt to provide additional homes from sites within the urban area. There is concern, however, that by changing policies, for example, to increase the minimum density on sites has wider policy implications to take into account than simply increasing the number of homes.
- The Housing Background Report suggests a continued allowance for larger windfall sites. It is suggested that it is inappropriate to include an allowance for this source as there is no certainty that this land will come forward for development.

- Other sources, such as converting employment sites to residential sites, based on the evidence presented and feedback from the development industry, it is known that there are employment sites functioning well as employment sites but are to be converted to residential and other employment sites that are unoccupied and undesirable that are to be retained as employment sites. Clearly, there is a mismatch between employment land need and employment land supply. It is advised that a qualitative assessment of employment sites is undertaken to find out which sites are fit for purpose and not.

4.5 As a result of the OAHN and the land supply identified from the Housing Background Report, it is concluded that there is insufficient urban land to provide for the development requirements and that a Green Belt Review should be conducted. It is noted that scoping is underway and that the work is to be completed in mid 2018. It is hopeful that the development industry will be involved in defining the methodology of the work to ensure that it is conducted in a robust way.

4.6 Another very important piece of work to be taken into consideration will be the Greater Birmingham and Black Country HMA Strategic Growth Study. It is unclear at this stage what role the Black Country authorities will play in meeting the wider needs of Birmingham and, indeed, whether it can now contribute given that meeting the needs of the indigenous population will be a tall order. Further, there is uncertainty with regard to how far the study will go in identifying locations for growth and how this evidence will be taken forward in emerging Development Plans, particularly given that it is premature to the Green Belt Review for the wider Black Country area. It is our view that there are sites within the Green Belt that will provide sustainable locations for growth and that their removal will not compromise the purposes of the Green Belt and, accordingly it will remain purposeful and functional.

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*

4.7 It is considered that the evidence contained within Table 1 is comprehensive, however, as suggested above and below, a number of concerns have been

highlighted and it is therefore suggested that these are addressed in order to improve the soundness of the next iteration of the Core Strategy Review.

- 4.8 It is welcomed that an updated qualitative assessment of employment land should be undertaken in order to identify if they are fit for purpose, in accordance with the quantitative employment land study. In particular, it has been identified by developers that a number of employment land sites that have been suggested for residential land allocations remain in occupation as functioning employment sites. Conversely, there are vacant employment land sites that have been marketed over a period of time where no market interest has been forthcoming and, therefore, it is recommended that these sites should be considered for housing delivery.
- 4.9 It is noted that Viability Studies are identified as evidence base documents that are still to be prepared. Whilst not specifically identified, it is recommended that affordable housing viability is a key matter that needs to be addressed as part of this evidence base to ensure the level suggested by the SHMA Part 2 is deliverable. If this is not the case, the delivery of both market and affordable housing could be compromised and prevent the successful delivery of any new strategy.
- 4.10 In respect of Green Belt, the two-stage approach of considering Green Belt, both locally and as part of the Greater Birmingham and Black Country HMA Strategic Growth Study, is supported by Taylor Wimpey.
- 4.11 Consideration of the Green Belt should identify Green Belt 'parcels' around the Black Country which do not fulfil Green Belt purposes as strongly as others. As part of this two-stage exercise, it will be important to have regard to proposals submitted through the call for sites process to ensure the parcels identified as fit for purpose.

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.*

- 4.12 In terms of the extent of the sub market, which includes the Black Country and South Staffordshire, this is considered to be appropriate. It is recognised and welcomed that the Black Country authorities and South Staffordshire have jointly

undertaken a SHMA for the sub area, which facilitates the preparation of an Issues and Options Core Strategy Review. There is concern, however, that the remaining constituent authorities within the wider Greater Birmingham Housing Market Area have not taken part and there is a danger that housing need for the whole HMA may not entirely be comprehensively captured due to the different time periods covered by the separate studies. It is advised that a SHMA, consistent with the guidance in the NPPF and Planning Practice Guidance, is prepared for the entire HMA over the same Plan period (as opposed to a housing needs study), which will properly consider all relevant factors in a consistent and comprehensive manner.

- 4.13 The dwelling requirements arrived at by the SHMA are generally supported, however, it is suggested a further scenario should be tested to consider long term growth which includes balanced periods of economic prosperity and decline. There is concern that the economic growth scenarios are not sufficiently robust to accurately determine the impact of forecasts based on existing circumstances. In addition, more aspirational job growth targets, such as those arising from the SEP, may not necessarily be appropriate for the Black Country (as discussed later in these representations).
- 4.14 In terms of providing an uplift for market signals, a 25% uplift for South Staffs is agreed to be appropriate. It is advised that dwelling requirements for the Black Country should not be reduced as a result of this and, accordingly, the application of such an uplift in South Staffordshire should not count towards meeting any unmet needs outside of the HMA as the main function is to provide slack or headroom within the housing market and prevent house prices from increasing at an accelerated rate, exacerbating issues of affordability.
- 4.15 We shortly await a consultation publication from central Government in relation to providing a standardised methodology for generating dwelling requirements. This is anticipated in Autumn 2017. The Black Country authorities will need to take account of any proposed national policy changes identified through the consultation paper. It is considered that, whilst a standard methodology will be helpful in identifying a baseline dwelling requirement, the consideration of long term trends and economic forecasts cannot be carried out in a mathematical calculation outside a demographic/ economic model. In light of this, the SHMA prepared for the sub-area could remain useful as evidence to inform the review of the Black Country Core Strategy.

- 4.16 In terms of meeting the dwelling requirements, it is understood that the 'Call for Sites' consultation will inform an updated SHLAA, which will assess sites both within and outside the urban area to determine the maximum number of dwellings that can be realistically delivered within the Black Country over the proposed Plan period. The Housing Background Report that has been published as part of the evidence base for the Issues and Options Core Strategy Review has considered assumptions contained within the SHLAA based on adopted policies and considers changes to the policies to boost the delivery of housing on existing sites. Whilst it is a commendable that the Black Country authorities are exploring all potential options to boost housing on urban land, there are wider implications of doing so and accordingly, caution is expressed in response to a number of the identified approaches proposed.
- 4.17 As confirmed in paragraph 3.15, it is extremely important that the Black Country authorities 'firm up' the housing supply in order to ensure that there is sufficient provision to meet the dwelling requirements. It is also considered appropriate to provide an additional buffer of housing land supply to provide a contingency when sites are delayed. As explained earlier in the Issues and Options Report, sites providing a total of 3,000 homes have not come forward as anticipated. It is considered that additional supply is required to provide flexibility and minimise any durations within the Plan period where the housing trajectory would otherwise dip.
- 4.18 In terms of the extent of a buffer for housing land, the Local Plan Expert Group suggested that additional land, equivalent to delivering 20% of the overall dwelling requirement, is added to the supply, which will provide a contingency of land to be used as and when necessary during the Plan period. It is suggested that this additional land will help ensure the dwelling delivery targets and housing needs are met in a timely manner, which will reduce the opportunity for households to become concealed or shared.
- 4.19 It is also appropriate to ensure that, as well as identifying the right amount of land, there is sufficient variety in the types of sites (brownfield, greenfield, Green Belt) are identified, reflecting different sizes, in a range of locations. This variety in provision will allow the best opportunity for multiple sites to come forward at the same time without market constraint and hence ensuring delivery targets are met. In addition, this approach will also provide market choice to existing and arising households looking to move into a new home in the Black Country, which

will have wider social benefits (i.e. allow families to live nearby one another and provide an opportunity to diversify existing communities through providing alternative homes to the existing housing stock).

4.20 Indeed, as previously documented in the adopted Core Strategy, it is considered that the ambition to retain the young and professional population within the Black Country should be maintained and that suitable and attractive housing and complementary environments are encouraged.

4.21 Finally, it is welcomed that the Black Country authorities have agreed to test the dwelling requirement figures on an ongoing basis. It is hoped that the suggested changes/alternative scenarios suggested above are implemented in order to ensure the evidence base is robust and the resultant policies and proposals soundly based.

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.*

4.22 The Core Strategy review intends to utilise the Economic Development Needs Assessment (EDNA) for the Black Country, published in May 2017, to inform future employment land requirements. The EDNA uses forecasts produced as part of the West Midlands Combined Authority Strategic Economic Plan (SEP) to calculate long-term growth, noting that the 'Super SEP Economy+ Scenario' is the preferred aspirational scenario. This scenario assumes average annual growth in employment of 1.3% across the Combined Authority and presents an ambitious view of future growth in the area, with 500,000 jobs created between 2013 and 2030. The SEP Technical Appendix breaks down the job forecasts for the three Local Enterprise Partnerships that form the Combined Authority (Black Country; Coventry & Warwickshire; and Greater Birmingham & Solihull). Jobs growth in the Black Country LEP is forecast to be around 1.1% per annum, rising to 1.5% per annum in the other two LEPs. This averages out at annual growth of approximately 1.3%. Using data from the Business Register & Employment Survey, published by the Office for National Statistics, it is possible to look at employment trends over the last five to six years (2009-15) and this analysis suggests that the growth rate used in the aspirational growth scenario may be too ambitious for the Black Country:

- 4.23 Between 2009 and 2015, total employment in the Black Country LEP increased from around 450,000 to approximately 453,000. This equates to average annual growth of 0.1%. Walsall (1.5% p.a.) and Sandwell (0.9% p.a.) experienced jobs growth, although Dudley (-1.1% p.a.) and Wolverhampton (-0.8%) both suffered a fall in employment.
- 4.24 By contrast, both the Coventry & Warwickshire and Greater Birmingham & Solihull LEPs saw total job numbers increase by 1.3% p.a. from 2009-13. A number of districts in these LEPs saw particularly strong growth over the period, notably Solihull and Lichfield in Greater Birmingham & Solihull, where employment grew by at least 3.0% on an annual basis.
- 4.25 Growth in the Black Country needs to be faster than in previous years and the new Core Strategy has a vital role to play in supporting this, however the analysis presented above suggests that the growth targets need to be lowered to better reflect the local economic climate. It is considered unlikely that an annual increase of 1.0% or more will happen in the area in the long-term, especially with the Coventry & Warwickshire and Greater Birmingham & Solihull LEPs capturing new job opportunities at a faster rate in recent years. Lowering the employment growth rate means the amount of employment floorspace needed would be lower, however this would potentially free up previously allocated employment sites for other uses such as residential. This would help the Black Country meet its future housing targets and ensure that it has enough homes for its future workforce to live in.
- 4.26 As identified in the supporting report and above, it is known that employment sites that had previously been identified for housing are still operational with businesses continuing to use the land and, conversely, there are sites allocated for employment that have been vacant and subsequently market, however, remain unoccupied, which could be transferred to a residential use. It is therefore recommended that the Councils ensure that updated EDNA qualitative review conclusions are taken into account and correct uses applied where appropriate.

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?*

- 4.27 In respect of the Green Belt Review, on the basis of the evidence published setting out housing need and supply, it is agreed that it will be necessary to find sites outside of the existing urban area, which will require removing land from the Green Belt where it is appropriate to do so. This will provide an opportunity to identify strategic sites that can provide a significant amount of homes to contribute to meeting identified housing needs. It is considered that there are a number of locations whereby housing sites can be identified, without the purposes of the Green Belt being compromised, ensuring the function and integrity of the Green Belt will remain.
- 4.28 In addition, areas on the urban fringe have the potential to ensure new homes can be delivered in an established, well landscaped environment, which could be attractive to those young families and professionals that the Black Country authorities have had difficulty in retaining, often through out-migration to neighbouring Shire districts considered to represent more aspirational locations.
- 4.29 In terms of the process and methodology for undertaking a Green Belt Review, it is understood that the awaited Strategic Housing Needs Study (SHNS) will be accompanied by Strategic Green Belt Review across Greater Birmingham and that the Black Country authorities have been engaged in presenting potential opportunities. It is reassuring that this engagement between consultants and local planning authorities is taking place as there is a danger that logical locations fail to be identified due to a lack of understanding of environmental conditions and/ or local circumstances that are applicable to sites.
- 4.30 It is agreed and makes sense for the local planning authorities to conduct a Stage 2 Green Belt Assessment following the completion of the higher level work. Any input on reviewing the draft methodology for the Stage 3 Green Belt Review would be welcomed.

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?*

- 4.31 The key issues presented are considered to be relevant, however, there are a number of inconsistencies relating to matters identified above against the previous questions raised. These include:
- The need for the Core Strategy to continue to plan for a growing population

- The need to address the significant housing shortfall identified within the Black Country and the wider Housing Market Area, which will need to be considered through the Duty to Cooperate; and
- The urgency to look beyond the Growth Network in the short term in accommodating housing growth, which will inevitably require the release of land from the Green Belt to meet needs in the longer term.

5. REVIEWING THE STRATEGY TO MEET NEW CHALLENGES & OPPORTUNITIES

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

5.2 In the main, the Core Strategy Vision and sustainability principles are considered to be appropriate, all except for the principle to 'put brownfield first'. It is understood that the NPPF, whilst it encourages an efficient use of land and for brown field land to be recycled, it does not suggest a sequential approach to development. There is no evidence to demonstrate that the development of greenfield land will compromise the development of brownfield land. Often the type of developers of the different land categories are different and, given the scale of the housing need, it is appropriate that the early delivery of housing is encouraged from all types of sites. In particular, the larger, potentially Green Belt, sites will have a longer lead in time due to the time it takes to plan for, determine and implement a comprehensive scheme. Indeed, a recent study entitled 'Start to Finish', prepared by NLP, supports this claim. When planning the housing trajectory for the Core Strategy, the larger sites should be planned in to come forward as soon as practically possible.

5.3 It is, therefore, suggested that the reference to 'putting brownfield first' is inappropriate and that it should be replaced by 'ensuring an efficient use of land to meet the identified housing needs', which encourages the recycling of land and recognises the contributions of greenfield/ Green Belt land to meeting housing delivery targets.

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?*

5.4 Whilst the objectives outlined generally remain sound, there is concern that one of the NPPF's main priorities is absent. This is in relation to significantly boosting the supply of housing. It is suggested that an additional objective is added in order to ensure that meeting housing needs remains a priority within the Black Country. Once a preferred option is arrived at, spatial references as to where the housing growth will be delivered could be included (for example, meeting housing needs on urban (brownfield and greenfield) land and at extensions to the urban area).

5.5 Further, given the increased employment land requirements, the second objective relating to employment land being within the best locations within the Regeneration Corridors may no longer be appropriate. Indeed, as highlighted earlier, there is concern that there is a mismatch in land allocations, and it is appropriate for the Core Strategy review to ensure all employment sites are fit for purpose. This may conclude that employment opportunities should be identified on new land outside of the Regeneration Corridors. Should this be the case, the objective would be inappropriately worded.

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?*

5.6 It is agreed that the policies could remain, if the development requirements and related changes are made to ensure the policies are consistent with the overall strategy. The changes relate to both the quantum of development (homes, employment and retail space), the location of development (within and beyond the existing Regeneration Corridors) and the type of development (brownfield, greenfield and on land removed from the Green Belt). It is considered that references should be made to urban extensions (on land removed from the Green Belt) in Policy CSP2 specifically, to highlight the important contribution that such sites will make to meeting the development requirements of the Plan.

5.7 On a separate note, whilst a point mostly relating to the South Staffordshire Local Plan to which separate representations will be made, it is considered that the currently adopted approach to spatial distribution in South Staffordshire will need to be re-assessed. Given the huge housing requirements of the Black Country and the shared housing market between South Staffordshire and the Black Country, it is considered that suitable urban extension sites located within South Staffordshire District would be the logical and sensible locations to meet any remaining unmet housing need. In terms of the relevance of this point to the Black Country Review, it will be important for the Black Country authorities to collaborate with South Staffordshire on cross-boundary issues, and to identify suitable extension sites to the Black Country built area which fall within the planning jurisdiction of South Staffordshire District. It is welcomed that this approach is planned to be undertaken, by virtue of the forthcoming Green Belt

Review which will be a joint exercise between the Black Country Authorities and South Staffordshire District.

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?*

5.8 No comment.

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?*

5.9 Taylor Wimpey wishes to emphasise the importance of selecting the most appropriate approach, given this will be the basis for the site allocations which emerge through the Core Strategy review.

5.10 Whilst there are opportunities and challenges presented by both Option 1A and 1B, Taylor Wimpey supports Option 1A as the appropriate approach for meeting housing needs.

5.11 Option 1A is considered to be more appropriate for accommodating the growth needs of the Black Country over the Plan period to 2036. There are many opportunities provided by this option, particularly that it can provide for a sustainable pattern of development, close to the urban edge of existing settlements, and close to where needs arises in the Black Country. This option would significantly boost the supply of housing land and help to meet the significant current and future identified need.

5.12 Option 1B is rejected by Taylor Wimpey. In accordance with previous comments and concerns raised in these representations, there are sufficient not opportunities to meet housing needs on brownfield land. As Option 1B would not have sufficient capacity to accommodate all future growth needs, it is entirely inappropriate for this to be the sole basis for a new Development Plan.

5.13 Other key challenges posed by Option 1B include the difficulty of delivering housing on brownfield land given the costs associated with site assembly and land remediation and that delivery on larger sites may be towards the latter years of the Plan period.

- 5.14 Option 1A would provide a more immediate response to the housing growth crisis within the Black Country and would cater for more rapid delivery of suitable sites.

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.*

- 5.15 As highlighted previously, the key to understanding where the most appropriate employment/ housing locations are within the Growth Network and Corridors will be determined through a qualitative assessment of allocated employment sites. It is understood an updated assessment has been undertaken and such work, complete with responses to the Call for Sites consultation, will provide the Black Country authorities with evidence to determine the urban capacity for housing, which may include transferring some employment land to housing as well as housing land to employment. This work will then outline the number of dwellings to be accommodated beyond the existing Growth Network within the Green Belt.

- 5.16 It is welcomed that the Issues and Options Draft recognises the need to release Green Belt in all scenarios proposed.

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.*

- 5.17 Please see response to Question 13a below.

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).*

- 5.18 Please see response to Question 13a below.

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.*

- 5.19 Given the scale of the housing need, there is concern that the development requirements could not be met with just one of the suggested options presented and, therefore, a combination of both options will be necessary.
- 5.20 To be in the best possible position to significantly boost the amount of housing and meet the development requirements in the Black Country, in accordance with the NPPF, it is advised that opportunities to both round off edges of the Green Belt and Sustainable Urban Extensions are proposed in the Preferred Options Draft Core Strategy. As highlighted within the Issues and Options Draft, there are challenges and opportunities that come with both types of development, for example from a delivery perspective, smaller sites will come forward more quickly due to the nature of these being straight forward proposals (with limited infrastructure necessary and one or few land owners) and larger sites will ultimately take longer as they are more complex (with multiple land uses, infrastructure and land owners). This fact has been evidenced by Nathaniel Lichfield and Partners (now known as Lichfields) within their report 'Start to Finish' who concluded that the average planning approval period of schemes of 2,000+ dwellings is 6.1 years and the annual average build out rate is 161 dwellings per annum. These figures demonstrate the need to have a number of sites of different sizes and in different locations removed from the Green Belt. The report also identifies, with regard to housing delivery, that 50% more homes per annum are delivered on average on large greenfield sites than large brownfield sites. This is a significant benefit of including greenfield sites within the Preferred Option and will assist to secure its delivery.
- 5.21 In terms of the locations for removing land from the Green Belt, this should be informed by the Strategic Growth Study and a Black Country Review of the Green Belt. The more detailed study will provide an assessment of land parcels against the purposes of the Green Belt and is likely to recommend that those that compromise the purposes the least will be shortlisted for further consideration to be removed from the Green Belt. It is advised that the next stage should be a consideration of the shortlisted sites based on their suitability (i.e. are the neighbouring uses compatible, would any previous land uses prevent the development of the site), sustainability (i.e. proximity to/ ability to provide local services/ public transport/ employment opportunities) and deliverability (i.e. whether the site is available, being promoted for development, has no barriers to coming forward etc.) credentials. Clearly each site will fair differently against such criteria and the Call for Sites submission will assist the Council to come to a

decision on the preferred sites. It is advised that the Black Country authorities should be mindful of the opportunities, through infrastructure and design, that development can bring that will enhance the diversity and character of a particular location.

5.22 In terms of the characteristics of a Sustainable Urban Extension, this is likely to vary depending on the location of each site. For example, some may be more urban and others suburban in their character and would, therefore, provide a different land use offer. It is important that each are considered on a site by site basis to ensure that any subsequent allocation delivers a successful development. It is important that the developer responsible for promoting the site helps to influence what is ultimately delivered. Often what is proposed on site has been informed by housing market intelligence undertaken by sales experts at development companies and, therefore, should be taken into account. Particularly given recent experience in the down turn in the apartment market, it is important that sites are allocated for the right type and mix of housing to ensure that it will be delivered, occupied and successful.

5.23 In the more suburban locations, it is suggested that Sustainable Urban Extensions should look to provide a different offer to potentially what exists in the Strategic Centres and Regeneration Corridors, such as a mix of larger and lower density homes, which will attract those households that in the past have migrated elsewhere. Given the emphasis on delivering more high density homes in the Strategic Centres, it is important that this housing mix is offset by more larger homes in appropriate locations. Otherwise, there is a concern that the Black Country will have a disproportional amount of small homes, which will further encourage more families to migrate elsewhere and not meet the aspiration to diversify the wider HMA.

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

5.24 The type of infrastructure needed will vary depending on the different location and size of each site and must be compliant with paragraph 122 of the CIL Regulations that requires planning obligations (which applies to most infrastructure) to be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

5.25 With the above in mind, however, provision for open space (both formal and informal), local centre and potentially a primary school should be considered for sites in excess of 1,000 homes.

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?*

5.26 Land off Linthouse Lane, Wolverhampton, should be considered as an available, suitable and deliverable location for growth, that would represent a logical Sustainable Urban Extension to the Major Urban Area. Further information is set out at Chapter 8 to these representations to evidence the site as a 'sound' locations to meet current and future housing needs arising within the Black Country and wider Greater Birmingham Housing Market Area.

5.27 It should be noted that an emerging proposal makes an allowance for the provision of infrastructure and Taylor Wimpey is committed to further dialogue with the relevant authorities and infrastructure providers to determine the infrastructure required to support the delivery of this proposed SUE.

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?*

5.28 For the reasons outlined above, relating to considering existing local circumstances and CIL Regulation requirements in respect of any charging schedule and planning obligation requirements, it is advised that detailed guidance for the development of SUEs should not be specific within the Black Country Core Strategy as each site will vary and deserves a more detailed consideration at the local level.

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

5.29 There are no other sustainable and deliverable options that we are aware of within the Black Country administrative boundary that are capable of delivering the housing spatial options.

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?*

- 5.30 If, once all realistically deliverable options have been considered, there remains an unmet need for housing it is agreed that the Black Country authorities should consider the possibility of exporting growth to neighbouring authorities within the HMA. In particular, there are options to expand existing settlements that are close to the administrative boundary (for example, in both the Black Country and South Staffordshire) across authorities and, therefore, once all options within the HMA have been explored, these could help deliver growth in a sustainable and deliverable manner. These opportunities should be explored first prior to exporting further growth to other authorities within the HMA where there is less of a spatial connection.

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

- 5.1 Land off Linthouse Lane, Wolverhampton, should be considered as an available, suitable and deliverable location for growth, that would represent a logical Sustainable Urban Extension to the Major Urban Area. Further information is set out at Chapter 8 to these representations to evidence the site as a 'sound' locations to meet current and future housing needs arising within the Black Country and wider Greater Birmingham Housing Market Area.

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.*

- 5.2 It is important to consider a number of factors, including migration and travel to work patterns which were used to identify the extent of the HMA, to determine where households relocate to when leaving the Black Country in order to understand where and why those moves are taking place. Whilst planning can attempt to influence where people relocate to, there is no mechanism to guide or restrict people moving to or from certain locations. Once knowledge of movers

can be understood can the planning system attempt to recreate those attractive characteristics (homes that are more affordable, good public transport links, employment opportunities etc.) in locations where there is capacity for the homes to be delivered. It is advised that an additional analysis of the data, where necessary, is undertaken to provide the Black Country authorities with the relevant intelligence to deliver a successful strategy for growth outside the administrative area.

Question 16: *Do you support Spatial Option E1? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites? (e.g. quick motorway access) If you think that are any potential locations that should be considered please provide details (please submit specific sites through the 'call for sites' form).*

5.3 No comment.

Question 17: *Do you support Spatial Option E2? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites e.g. quick motorway access, good sustainable transport links? If you think that are any potential locations that should be considered please provide details (please submit specific sites through the 'call for sites' form).*

5.4 No comment.

Question 18: *Do you support Spatial Option E3? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites? (e.g. quick motorway access) If you think that are any potential locations that should be considered please provide details (please submit specific sites through the 'call for sites' form).*

5.5 No comment.

Question 19a: *Do you support Spatial Option E4? Yes/No; Any further comments?*

5.6 No comment.

Question 19b: *Should any factors be taken into account in an assessment of the opportunities? Yes/No; If yes, what should they be? (e.g. quick motorway access, strong transport links with the Black Country, good sustainable transport links*

with the Black Country) If you think there are any potential locations that should be considered, please provide details.

5.7 No comment.

Question 20: *Do you think there are any other deliverable and sustainable Employment Land Spatial Options? Yes/No; If yes, please provide details.*

5.8 As previously outlined, there is concern that some of the employment sites currently identified are potentially not fit for purpose and others that are identified to be transferred to housing remain in employment occupation. In light of this mismatch, it is welcomed that an updated qualitative assessment has been undertaken and has informed how much employment land is has be found outside the urban area.

5.9 In terms of where the employment land should be located outside the urban area, as with housing, decisions should be based on the results of the Green Belt Review and the suitability, sustainability and deliverability of sites. For employment land sites, the suitability of a site may well include good transportation links for goods and people. The Call for Sites consultation will assist in putting forward suggestions for sites.

5.10 In terms of exporting employment land, it is considered that a proportionate amount of employment land to housing land exported should be made in an attempt to create more sustainable communities, that is unless there is good reason not to do so (i.e. due to improved public transport links between exported housing and employment sites). As evidenced in work supporting the Issues and Options Draft, whilst the Black Country is a sufficiently self-contained labour market there are strong linkages with Birmingham and South Staffordshire. This would therefore suggest that these locations should be first explored for transporting any employment land growth, however, given the land capacity issues in Birmingham it is more likely that South Staffordshire would be able to assist.

6. DELIVERING GROWTH – INFRASTRUCTURE & VIABILITY

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.*

- 6.1 Policy DEL1 is considered to be sound on the basis that it is sufficiently flexible to deal with different circumstances on different sites across the Black Country, including sites that are to be removed from the Green Belt.

Question 22: *Do you have evidence of a requirement for new social infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.*

- 6.2 Taylor Wimpey is in consultation with the relevant authorities to explore any requirements for social infrastructure to serve any need relating to the development proposals.

Question 23: *Do you have evidence of social infrastructure that is no longer needed and where the site could be reallocated for alternative uses? Yes/No; If yes, please provide details.*

- 6.3 No comment.

Question 24: *Do you have evidence of pressure being placed on the capacity of current social infrastructure which could be exacerbated by new housing? Yes/No; If yes, please provide details.*

- 6.4 No comment.

Question 25: *Will there be any new social infrastructure requirements necessary to serve large new housing developments? Yes/No; If yes, please explain the type and scale of any new social infrastructure required.*

- 6.5 It is recognised that development of approximately 2,500 homes on land off Linthouse Lane will give rise to the need to deliver supporting infrastructure. Taylor Wimpey is committed to working with the relevant authorities and service providers to determine the capacity of existing infrastructure and determine the level of mitigatory provision necessary to support an increase in the population in this location. It is however important that each potential large new housing development is given independent consideration in respect of any infrastructure

obligations, recognising that pressures will be dependent on location and existing infrastructure capacity.

Question 26: *Do you have any evidence of a requirement for new physical infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.*

6.6 No comment.

Question 27: *Do you have evidence of pressure being placed on the capacity of current physical infrastructure which could be exacerbated by new developments? Yes/No; If yes, please provide details.*

6.7 No comment.

Question 28: *Do you think physical infrastructure is necessary to serve large new housing developments? Yes/No; If yes, what type and scale of physical infrastructure is necessary?*

6.8 As set out above, the need for infrastructure will vary for each site. Given such different circumstances, it would be inappropriate and potentially unlawful (as it would conflict with paragraph 122 of the CIL Regulations) to incorporate a blanket policy requiring specific infrastructure on every large housing site.

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.*

6.9 It is considered that the existing national framework (which includes the NPPF and CIL Regulations) provides a sufficient tool to ensure the relevant infrastructure is delivered. In addition, the CIL Charging Schedule allows authorities to raise funds for named infrastructure projects, which should be updated in line with any Core Strategy advanced. Therefore, it is considered that there are existing provisions to deliver infrastructure and no additional interventions through the Black Country Core Strategy Review are needed.

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.*

6.10 There is no a need for any specific interventions, such as phasing, to protect the delivery of urban regeneration in the Black Country. Indeed, it is considered that development of greenfield and Green Belt sites can very much compliment urban regeneration through the provision of a more varied form of development that will help diversify the housing stock and profile of residents in the wider area, which will assist to sustain and improve the vitality of existing communities. Further, as highlighted above, given the priority to significantly boost the delivery of housing greenfield and Green Belt sites should come forward for development as soon as practically possible. Given lead in and build out rates of larger sites, the land should be encouraged to be developed as soon as possible so to ensure the homes are delivered in the plan period and the needs are met.

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?*

6.11 When delivering greenfield/ Green Belt sites, there is an opportunity to deliver infrastructure to meet the needs arising from the proposal, which may have wider benefits for the local community. In addition, it is likely that the communities created by the Sustainable Urban Extensions will potentially be more affluent and share their wealth using local shops and services within the wider Black Country, which will contribute to more successful and prosperous communities.

7. REVIEW OF EXISTING CORE STRATEGY POLICIES & PROPOSALS

Housing

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

7.1 As identified above, it is important that a range of sites in different locations are identified to be in the best possible position of delivering the development requirements. In terms of presenting these sites in the Core Strategy, whilst it is useful to identify a housing trajectory, it is important that there is not a phasing policy as such that would prevent the delivery of housing, given the current housing crisis. As stated above, the delivery of housing on greenfield and Green Belt land will not compromise the delivery of urban regeneration as the development on the urban edge will complement and rejuvenate the environment in a different way.

7.2 In terms of the proposed level of discounting, it is considered that if the LPA adopt an approach to identify a further 20% of sites in accordance with the LPEG recommendations identified above, there would not necessarily be a need for the application of discounting in determining the overall level of supply. It is interesting to note that the level of discounting proposed by LPEG is suggested for all LPAs, not necessarily those which have experienced difficulty in delivery. It could therefore be argued that an increased buffer of 25% could be applied in order to take a cautious approach.

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?*

7.3 It is clear that the current accessibility and density standards outlined in the adopted Core Strategy were formulated in the context of the vast majority of development taking place on brownfield sites within the defined urban area. As reiterated throughout these representations, there is now a clear need for Green Belt release as part of the Local Plan Review to meet emerging, objectively assessed housing needs. We outline in further detail below why the adopted accessibility and densities would not be applicable to Green Belt sites, however would suggest that the current standards do not allow sufficient flexibility on

brownfield sites. A blanket application of prescriptive accessibility and density standards across the Black Country, be it brownfield or greenfield, does not allow sufficient flexibility which take into account site specific characteristics. The Council should allow for greater flexibility when assessing accessibility and density standards, with a more pragmatic approach which allows appropriate assessment for site-specific characteristics and also an assessment of market demand which may vary significantly across the large Black Country area.

- 7.4 Paragraph 47 of the NPPF outlines how local authorities should set out their own approach towards density. It is suggested that the currently adopted approach does not allow for sufficient assessment of local characteristics. It is clear that the chosen approach must be reflective of local circumstances, including the matters outlined above as well as infrastructure and services available in the locality. It is advocated that a more flexible approach to density and accessibility standards is taken as part of the emerging Local Plan Review.

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*

- 7.5 In line with the comments above, it is suggested that the Council should assess each site on a case by case basis in terms of accessibility and density standards. This approach would suggest that the numerical baseline trigger of 15 homes or more will not always be appropriate or applicable, and as advocated throughout these representations it suggested that there should be a complete re-assessment on accessibility and density standards as part of the emerging Local Plan Review.

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?*

- 7.6 No, it is not considered that the current standards would be applicable to Green Belt release locations. The adopted standards are overly prescriptive, and as previously discussed were written in the context of brownfield land. Green Belt release sites have a completely different type of character, therefore consideration of accessibility and density standards in relation to these sites should be reflective of local character and site characteristics. The more suburban settings of Green Belt release land lends itself to lower densities which are more appropriate to the Green Belt setting, which typically deliver more family homes.

The Council must provide robust evidence to test any forthcoming accessibility and density standards in relation to Green Belt release locations, which allows for a flexible and pragmatic approach.

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.*

- 7.7 It is clear that separate accessibility standards will apply to particular types of housing such as affordable and for the elderly population, however in line with the sentiment expressed above, any forthcoming standards should be based on robust evidence and allow for sufficient flexibility to avoid any unnecessary constraints to development coming forward.

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.*

- 7.8 A general and blanket application for house types across the Black Country should not be advanced as part of the Local Plan Review. Paragraph 50 is clear that local planning authorities should plan for a mix of housing based on current and future demographic trends and market trends. It is therefore notable that the NPPF specifically highlights 'market trends' in this context, which acknowledges that the market must inform such decisions.
- 7.9 Whilst the 2017 SHMA does provide an assessment of demographic and market trends, it is notable that it looks at a wider area assessment and is focused at a higher level. This assessment therefore does not draw out sub-market trends, and cover smaller areas within the vast Black Country area. Again, a blanket policy of house type targets across the Black Country area would not allow for sufficient flexibility to assess each site on a site by site basis, taking into consideration local market trends and demand. The NPPF does not state that specific policies should be set to enforce that local demand is met. As such, it is considered that this should be left for the market to decide, as opposed to applying rigid and prescriptive house size standards.
- 7.10 It is suggested that the evidence presented in the SHMA should be put into the Plan as an informative and general guide, but should not feed into a specific policy requirement which outlines housing mix percentages that should be applied

across the Black Country. A policy containing general house type targets could present as a significant constraint to the delivery of a site where there is no local market demand for this house type, which in turn would have a negative impact on achieving the necessary housing growth targets to be delivered in the Black Country over the Plan period.

Question 41a: *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:*

- 7.11 It is not considered that there is a policy need for the Core Strategy to address self and custom build housing in the emerging Review. Paragraph 6.32 indicates that there are only nine records on self and custom build registers in the Black Country. It is evident that that there is very limited demand in the Black Country, which is unsurprising given that self and custom build housing is often more popular in rural areas. Given the limited demand it is therefore not considered necessary to take a policy approach towards self and custom build housing within the Local Plan Review.

Question 41b: *A target for each authority? Yes/No; Any further comments*

- 7.12 Given that there is evidence of little market demand, it is not considered necessary for the Core Strategy to set targets for each of the Black Country authorities. If it was considered to be necessary as the Local Plan Review progresses, any targets being set should be formulated on the basis of robust evidence such as monitoring of the registers, to provide an indication of how many self-build homes will be needed.

Question 41c: *A requirement for large housing sites to provide serviced plots? Yes/No; Any further comments?*

- 7.13 There should not be a requirement for large housing sites to provide serviced plots. This can pose an unnecessary market constraint for large housebuilders when there may be limited or no market demand for self-build plots. Self and custom build plots are often unusual and unique in character, therefore would not be best suited to be located within a large housing development with more uniform house types. If deemed necessary, self and custom build housing should be allocated specific site allocations, as discussed below.

Question 41d: *Another approach altogether? Yes/No; If yes, please specify.*

7.14 If it is considered necessary for the Review to address self and custom build housing, this should be addressed by the Council's identifying and allocating specific plots for these uses. Identifying site-specific plots would ensure that the most appropriate and suitable locations for self and custom-build will be allocated, via the assessment of appropriate evidence and market demand. In addition, this might be more likely to be achieved on surplus publicly owned land.

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.*

7.15 As a general principle, the notion of applying different affordable housing ratios to different parts of the Black Country, based on an understanding of needs and viability, is acceptable. Given that the Black Country represents a vast area, there will not be a uniform housing market, and there will be sub-market trends within this wider area. As such, a more flexible approach which assesses local housing market evidence on a case by case basis could be justified. That said, there is an inherent simplicity and attraction to a single rate figure, which is easy for the development industry to understand.

7.16 In terms of the annual affordable housing target, it is unclear how the Issues and Options document has calculated the figure of 832 homes per year. At paragraph 7.42 of the June 2017 SHMA Part Two- affordable housing document, it is stated that the total annual affordable housing need is 677 dwellings, which represents 19.8% of the annual projected household growth. This differs to paragraph 6.36 of the Issues and Options document, which states that the affordable housing target is 23.4% of total housing need or 832 homes per year. From paragraph 7.47 of the SHMA, it appears that this figure may have been calculated by adding the overall requirement of 16.6% of housing to be affordable rented and 6.7% shared ownership. Clarity is sought on how this figure has been calculated, and we reserve the right to comment further on this matter.

Question 43a: *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.*

7.17 We have not undertaken detailed analysis of the findings and assumptions of the SHMA and affordable housing delivery matters, therefore would like to reserve the right to comment on this matter further. However, on face value, it appears to be a reasonable threshold and is not dissimilar to other locations.

Question 44a: *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?*

7.18 Based on the current evidence, a blanket rate of 25% affordable housing would appear to be sound.

7.19 However, irrespective of the final rate, any amendments to the currently adopted affordable housing policy must continue to have a clause in it which stipulates that this requirement is subject to viability tests. Any revised affordable housing requirements will also need to carefully consider the implications of adopted Community Infrastructure Levy (CIL) regimes. Both Sandwell and Dudley Councils have adopted CIL Charging Schedules. These will have implications on viability, therefore if revised affordable housing targets are to progressed then these CIL tariffs will need to re-assessed and re-visited.

Question 44b: *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?*

7.20 At paragraph 6.39 of the Issues and Options Paper, it is stated that options need to be explored to increase affordable housing delivery of private sites. One option would be to increase the overall affordable housing proportion, which would require developers to provide affordable home ownership products plus an appropriate proportion of other affordable tenures. This paragraph follows on from commentary relating to the Housing White Paper.

7.21 The Housing White Paper discusses Starter Homes at Chapter 4, and explains how the government intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. It is later stated that it will be for local areas to work with developers to agree an appropriate level of delivery of starter homes, alongside other affordable home ownership and rented tenures.

7.22 The policy position on Starter Homes is not yet fully clear, and has yet to be formally established through a formal amendment and update to the NPPF. Until the national policy position on Starter Homes has been made clear, it would be premature for the Core Strategy Review to suggest an uplift in the affordable housing requirement to include affordable home ownership such as Starter

Homes. Any suggestion to uplift the affordable housing requirement to include Starter Homes should be reflective of the national policy position, as well as founded upon a robust evident base which dictates exactly what percentage this element should be of the overall affordable housing requirement.

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.*

7.23 The likely financial viability of Green Belt sites will vary across different areas of the Black Country, therefore any affordable housing requirements for Green Belt sites will need to be reflective of these circumstances. Any affordable housing targets for Green Belt sites should be based on robust evidence, and acknowledge that many sites may need to support and deliver other infrastructure requirements.

7.24 Ultimately, any affordable housing strategy will need to address the affordable housing need as well as the need for market housing. Bearing in mind that the SHMA confirms over 70% of homes required are for homes to be sold on the open market, any affordable housing policy must not dilute the delivery of these needs/requirements. A higher figure on Green Belt sites over and above a standard blanket figure would potentially do this.

Employment

Question 49a: *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.*

7.25 The Black Country is to be the subject of large levels of both employment and housing growth over the Plan Period. These uses are very much inter-linked with one another, and will drive each other's need for growth. The Local Plan Review, in order to meet emerging employment and housing needs, must identify a significant number of specific sites for employment and housing uses. By planning proactively and identifying suitable sites for both employment land and housing land, this should reduce the pressures to manage the release of poorer quality employment land, which may not always be suitable for release. The Local Plan Review should also seek to undertake a further review of poorer quality employment land to make it available for other suitable uses, if it proves to no

longer be viable for employment land use. This is in line with policy provisions of the NPPF, which at Paragraph 22 outlines that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

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.*

- 7.26 The continuation of setting a target for employment land stock would be supported. Policy EMP1 should make it clear that these are not maximum figures, to encourage further flexibility for additional growth.

Retail

Question 59: *Have all the appropriate centres within the Black Country been identified? Yes/No; If not, please specify additional centres*

- 7.27 No comment.

Question 61: *In addition to para 4.33 of the current Core Strategy should the revised Core Strategy include criteria for the creation of new centres that might be needed as a result of any additional housing identified through the plan? Yes/No; Any further comments?*

- 7.28 Criteria would be a useful policy tool to help assess the designation of new centres, and should be in line with previous methodologies used which set out clear thresholds.

Question 71: *Should the Core Strategy set housing targets for the Town Centres?*

- 7.29 Housing within Town Centres should be supported, in line with paragraph 23 of the NPPF which discusses the important role that residential development can play in ensuring the vitality of Town Centres. Any housing targets should be based on what sites are known to be readily available, suitable and viable for residential development. Market demand for housing in these areas will also need to be fully assessed. It is notable from the outcome of the 2017 SHMA that there is most demand for three bedroom properties (40%). The highest demand is therefore for family housing, and not for flats which are often the most popular within Town Centre locations. Any housing targets set for the Town Centre would

therefore need to consider the findings of the SHMA, and be reflective of the fact that family housing is often more suitable for delivery on larger sites, including on sites which are currently located within the Green Belt.

Environment

Question 99a: *Do you think that national standards for housing development on water consumption should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.*

- 7.30 When referring to water consumption paragraph 6.1.52 of the Issues and Options document states that the Black Country does not currently lie in an area of serious water stress, therefore clear need may be difficult to demonstrate. This evidence suggests that there is limited or no need to introduce such a policy, therefore it is not considered that the Core Strategy Review should seek to introduce water consumption standards for housing development.

Question 99b: *Do you think that national access standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.*

- 7.31 The introduction of any national access standards, with the Issues and Options document referring specifically to Lifetime Homes, again must be based on a robust evidence base which can demonstrate market demand. It is noted that Paragraph 50 of the NPPF states that planning authorities must plan for a mix of housing to meet a range of needs. In the same paragraph, it is later stated that these must be based on current and future market trends. If Lifetime Home standards are to be introduced these will therefore need to be based on robust evidence, to ensure that the standards are not overly onerous and prevent the delivery of other types of housing which have higher levels of market demand.

Question 99c: *Do you think that national space standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.*

- 7.32 As reiterated throughout these representations, it is not considered that a blanket approach of prescriptive standards across the Black Country allows sufficient flexibility to assess local market and site considerations in an appropriate manner. Whilst it is recognised that space standards can be an important tool to ensure that high quality of homes are delivered, we agree with the sentiment

expressed in the recent Housing White Paper. The Paper explains that the government are concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. The White Paper also states that the Government will be undertaking a review of the Nationally Described Space Standards. It is suggested that the Core Strategy Review should await the outcome of this national review of national space standards, to ensure compliance with national policy and to ensure that the most appropriate approach to space standards, if required, is taken.

Question 99d: *Do you think that the standards should be different for brownfield and greenfield sites? Yes/No; If yes, please explain how and why.*

- 7.33 As discussed above, prescriptive standards do not always allow sufficient flexibility for local market needs, so we would not advocate a blanket approach of different standards to brownfield and greenfield sites.

Open Space, Sport and Recreation

Question 102a: *Do you support the proposed changes relating to open space, sport and recreation? Yes/No; If no, please explain*

- 7.34 Paragraph 6.1.60 of the Issues and Options paper outlines how adopted Policy ENV6 creates the framework for open space policies at the local level. The Issues and Options paper outlines how this is in line with national guidance, and that it is proposed to retain this policy and update some references in the supporting text to reflect changing circumstances. It is agreed that the local level remains the appropriate place to set open space policies, and that Policy ENV6 should continue to endorse this approach.

8. LAND OFF LINTHOUSE LANE, WOLVERHAMPTON

- 8.1 Taylor Wimpey is currently in control of the land to the north of Linthouse Lane and to the south of the dismantled railway line as shown on the Site Location Plan appended to this representation (**Appendix 1**).
- 8.2 This land represents a logical and sustainable extension to the existing Major Urban Area that provides an opportunity for delivering approximately 2,500 new homes with associated supporting infrastructure.
- 8.3 As demonstrated on the attached Site and Contextual Analysis Plan (**Appendix 3**) there are no significant physical barriers to development. There are, however, a number of physical features which serve to shape the development shown on the illustrative masterplan. These include the power lines which traverse the site in a north-west to south-east direction as well as the localised topography of the site, existing vegetation and public rights of way.
- 8.4 An illustrative masterplan (**Appendix 4**) has been prepared to introduce an initial proposal, providing an indication of how the site could be delivered and function as a natural sustainable, urban extension to Wolverhampton. This includes a 20m offset to the existing power lines, retention of the existing public rights of way and vegetation.
- 8.5 The Illustrative Masterplan identifies the following key features for land to the north of Linthouse Lane on land where Taylor Wimpey has secured an interest:
- Circa. 2,500 dwellings;
 - Provision of land for the delivery of a number of potential community uses, including the provision of a new Primary School;
 - Significant provision of Green Infrastructure to include a landscape mitigation strategy;
 - Provision of SuDS through the delivery of new attenuation features; and
 - A new enduring Green Belt boundary defined by the route of the dismantled railway line.
- 8.6 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey

to date. This analysis concludes that land to the north of Linthouse Lane, within the control of Taylor Wimpey, is both suitable and deliverable and would represent a 'sound' location for meeting housing needs within the Black Country to 2036.

Landscape Sensitivity

- 8.7 Pegasus Environment has undertaken a Preliminary Landscape and Visual Appraisal (LVA) to determine the various landscape and visual constraints and opportunities of the wider site area and its context. This includes how these factors might serve to influence the potential for development in respect of an illustrative masterplan, and to influence an inherent landscape strategy as part of that masterplan.
- 8.8 The local landscape context comprises the wider pattern of agricultural land to the north, the topography of which is generally falling to the south towards the site, from a localised ridgeline between Essington and Westcroft. The site is located on gently sloping land between ca. +170m AOD and ca. +145m AOD. To the south, the existing settlement edge of Wolverhampton provides a townscape setting to the site and there are some near distance views into the site from this edge. Longer distance views towards the site are available from the southern edge of Essington and from higher ground to the north. The site is currently included as part of the West Midlands Green Belt. There are no landscape specific designations which cover the site or the immediate area.
- 8.9 The LVA identifies the key constraints and opportunities present in the site and surrounding landscape, and also the nature of the likely impacts that may arise from the proposed development. The LVA has analysed the baseline information in the context of the proposed development and has informed the proposals for landscape mitigation.
- 8.10 The development consequently incorporates a landscape mitigation strategy which will avoid, reduce or remedy adverse impacts. The development of the illustrative masterplan has been informed by an initial appraisal of the local landscape and visual constraints and opportunities. As such, the illustrative masterplan:

- Addresses near distance views from the edge of Essington across the Green Belt 'gap' between Essington and the edge of Wolverhampton, to maintain separation and deal with potential 'coalescence' issues;
- Includes a set-back of the development envelope away from the more elevated area of the site to the north-east;
- Utilises the well-vegetated dismantled railway line as a new Green Belt boundary;
- Provides a central linear open space in response to the offsets required to existing powerlines;
- Ensures an appropriate offset to the public right of way passing through the site along the existing hedgerow running north-south between Linthouse Lane and Blackhalve Lane; and
- Addresses longer distance views from the more elevated ground to the north by providing space for additional planting to strengthen the new Green Belt boundary in this location.

8.11 These over-arching principles set the framework for the areas which are proposed for development. Each of these can be subject to a greater level of detail regards masterplanning to identify constraints and opportunities at a more detailed level.

Ecology

8.12 Technical work has been undertaken by the Environmental Development Partnership Ltd to guide initial proposals on land off Linthouse Lane having regard to ecological sensitivities pertaining to the site, and identifying opportunities and constraints which may influence development.

8.13 The study confirmed that there are no statutorily designated nature conservation sites within the red line boundary shown at **Appendix 1**, however, there is a Special Area of Conservation (SAC) of European importance within 10km and two Local Nature Reserves (LNRs) of local importance within 2km.

8.14 *Cannock Extension Canal SAC* lies 6.3km northeast of the site and contains good water quality supporting floating water plantain and a diverse dragonfly and damselfly assemblage. Identified threats to the quality of this SAC that could

occur are: pollution to groundwater, air pollution, air-borne pollutants and invasive non-native species.

- 8.15 Due to the spatial separation of the SAC from land off Linthouse Lane, it is unlikely that the proposed development would result in any of the identified threats to the SAC arising.
- 8.16 *Rough Wood Chase LNR* lies 2km east of the site. There is no ecological connectivity to this woodland and wetland area, being separated from land off Linthouse Lane by the M6. In addition, there is no hydrological connectivity. The proposal is not considered to have a potential impact on this LNR.
- 8.17 *Waddens Brook LNR* lies 2km south of land off Linthouse Lane and is regionally important for its great crested newt population and populations of other amphibians. As there is no hydrological or ecological connection between the LNR and the site and the 2km of separation contains residential development and Wyrley and Essington Canal, the proposal is not considered to have a potential impact on this LNR.
- 8.18 Land off Linthouse Lane is not covered by any non-statutory designations, however there are a number of non-statutory sites within 2km of the boundary. With the exception of Ashmore Lodge Biodiversity Alert Site (BAS) and Oakley Farm Potential Site of Importance (PSI), the nature of the designation of each site and the intervening distance means that a potential impact on them from the proposed development is unlikely.
- 8.19 *Oakley Farm* is designated due to the presence of field margins on historic maps. During the Extended Phase 2 Survey, no habitats of importance were noted, with the grassland and hedgerows being species poor. Therefore, in ecological terms, development in this area would not result in a significant loss in biodiversity either within the proposal site or within the PSI at Oakley Farm.
- 8.20 *Ashmore Lodge* is the dismantled railway which runs through the proposed site. A majority of this dismantled line is lined with trees with some parts covered in semi-improved grassland, providing a linear feature of local ecological value. The proposal offers the opportunity to include:
- Additional planting of native tree species;

- Creation of diverse wildflower meadows in open areas on the line and in the buffer to this line; and
 - Removal of the giant hogweed by an experienced and qualified contractor.
- 8.21 If these opportunities were delivered, this would ensure no significant impacts would occur on any of the non-statutory designations within the potential zone of influence of the site and may result in an overall enhancement in line with local and national policy.
- 8.22 The remaining habitats within the site are predominantly of low intrinsic ecological value and present good opportunities for enhancement. They are not a constraint to development capacity in their own right, but have the potential to support protected species.
- 8.23 The possible presence of breeding birds, bats and great crested newts will need to be determined through further surveys, however, it is considered that, even if these protected species were found to be present, the populations could easily be safeguarded through sensitive scheme design and appropriate mitigation measures, and would not represent an 'in principle' constraint to development.
- 8.24 The initial technical work considers the site provides sufficient flexibility to ensure compliance with planning policy at all levels and to avoid 'significant harm' to biodiversity. Furthermore, a sensitively designed development incorporating appropriate mitigation and enhancement has the potential to deliver a significant net gain in biodiversity.

Heritage & Archaeology

- 8.25 An archaeological and heritage assessment has been prepared by Environmental Dimension Partnership Ltd to inform the proposal and to assess the potential effects arising from development within the site.
- 8.26 The report confirms that the site does not contain any designated heritage assets such as world heritage sites, scheduled monuments, registered parks and gardens, registered battlefields or listed buildings, where there would be a presumption in favour of their physical preservation in situ and against development.

- 8.27 Only one potentially sensitive designated heritage asset has been identified outside of the site. This is the scheduled ancient monument of Moat Farm moated site, which lies some 160m north of the site, to the north of Blackhalve Lane. The assessment concluded that whilst there is some potential for a low level of harm to the heritage significance of the monument through the change to its setting, this would need to be weighed against the public benefit of the proposed development, with harm being further mitigated through the detailed design of any proposal.
- 8.28 There are no listed buildings or other designated heritage assets in close proximity to the site, although there are a number of listed and locally listed buildings in the wider area. The assessment concludes that no opportunity for harm to these or any other heritage assets outside of the site is predicted as a result of development at land off Linthouse Lane.
- 8.29 The archaeological potential of the site is assessed as being low. Should any below ground archaeological remains survive, there is no reason to believe or expect that the site will contain archaeology of such significance that it would require preservation in situ and therefore constrain development of the site. The site has been intensively farmed and if any below ground deposits are found, they are likely to be poorly preserved due to this agricultural activity, thereby reducing their significance.

Highways and Transportation

- 8.30 The site is well placed in terms of accessibility to existing pedestrian and public transport networks. The site is also located in close proximity to local facilities including shopping, medical services and education facilities.
- 8.31 There are good public transport links in the area, with 7 two way buses per hour operating along Linthouse Lane and Cannock Road on a weekday and Saturday and, 4 two way buses per hour operating on a Sunday.
- 8.32 Travel by rail is achievable as part of a multi-modal trip i.e. park and ride and cycle and ride. There are hourly services to local destinations including Birmingham New Street which provides onward travel opportunity to destinations across the country.
- 8.33 Access to the site can be achieved from the surrounding highway network, including Linthouse Lane, Blackhalve Lane, Cannock Road and Kitchen Lane.

towards the south-western end of the site. There are a number of options and significant potential in terms of achieving safe, controlled and appropriate vehicular access to the site.

8.34 The Illustrative Masterplan identifies the following access points, but it should be noted that these are not necessarily exclusive locations:

- Proposed vehicular access via Linthouse Lane;
- Proposed vehicular access via Kitchen Lane;
- Proposed vehicular access via Blackhalve Lane;
- Proposed vehicular access via Cannock Road; and
- Proposed change of priority along Wood Hayes Road through the introduction of a new junction providing east west vehicular connectivity.

8.35 The illustrative masterplan also identifies the incorporation of existing Public Rights of Way (PRoW) within green corridors and proposes a network of new primary pedestrian routes maximising opportunities to create sustainable transport links (walking and cycling) to existing and potential new amenities and facilities.

8.36 In the longer term, to support a planning application, a Transport Assessment will be completed to assess impacts across the wider network, this will include speed survey work. The Transport Assessment will take account of any local committed development sites and any committed highway improvements. Suitable mitigation will be provided as part of the development proposals including any identified off site highway works and contributions.

Flood Risk and Drainage

8.37 The site lies in Flood Zone 1, the area at least risk from flooding.

8.38 Surface water drainage is proposed to be accommodated through the provision of a series of balancing ponds located around the site. The Illustrative Masterplan, included at **Appendix 4**, identifies the provision of balancing ponds through a network of green infrastructure.

Noise & Air Quality

- 8.39 Noise is unlikely to be a significant issue for the proposed development, however it is likely to have some impact on the form of any proposal. The northern boundary of the site lies adjacent to Blackhalve Lane (B4156), which also passes through part of the site. The eastern boundary is adjacent to Essington Rugby Club and Kitchen Lane. The southern boundary is adjacent to Linthouse Lane and the western boundary is bounded by properties off Woodent Road and Cannock Road.
- 8.40 It should be noted that landscaping would be included throughout the development in conjunction with carefully orientated and sited dwellings and associated gardens to minimise noise impact and preserve residential amenity.
- 8.41 Consequently, it is unlikely noise will have a significant adverse impact on the development of this site.

Ground Conditions

- 8.42 A full Phase 1 Environmental Risk Assessment has been completed for the site. The British Geological Map for the area indicates the site is underlain by superficial deposits of Glacial Till (variable but predominantly cohesive strata), which overlay solid strata that vary across the site.
- 8.43 The Phase I Environmental Risk Assessment for the site has been undertaken which identifies that it is unlikely that the site would be classified as contaminated land.

Utilities

- 8.44 Sewers are present in the vicinity of the site, including within the southern verge of Kitchen Lane, residential streets to the west of the site, within the eastern verge of Wood Hayes Road and along Blackhalve Lane. Accordingly, diversions are likely to be required in order to connect the site to the network. Whilst no sewers are located within the site, surface water outfalls into the watercourse along the western boundary are noted and a foul sewer is located to the west of the watercourse.
- 8.45 It is envisaged that foul flows from the land to the north of Blackhalve Lane could drain via gravity to an existing foul sewer located within Wood Hayes Road or to that which exists within Blackhalve Lane. Land to the south of Blackhalve Lane

has the potential to drain via gravity to a number of the public foul sewers located within Linthouse Lane.

- 8.46 Similarly, water mains are present in the vicinity of the site, including the northern verge of Kitchen Lane, the northern verge of Linthouse Lane, the western verge of Wood Hayes Road and Blackhalve Lane and therefore diversions are likely to be required. No water mains are located within the development area.
- 8.47 Further discussion with Severn Trent Water will determine suitable connection points and capacity within the network.
- 8.48 Regarding electricity cables, gas mains and phone lines, no apparatus is present within the development area. As a result, diversions will again be required.
- 8.49 The capacity of all of these utilities need to be determined but are unlikely to present any issues of deliverability in respect of the site.

Agricultural Land Classification

- 8.50 Natural England's Land Classification Map for the West Midlands Region (ALC004) shows that the majority of the site comprises undefined Grade 3 'Good to Moderate' quality agricultural land. It is noted that the majority of land around Wolverhampton and the wider Black Country urban area also comprises Grade 2 and 3 agricultural land.
- 8.70 Whilst it is acknowledged that the loss of any best and most versatile land is undesirable, the majority of the site comprises Grade 3 land, and that the scale of development required to support needs arising within the Black Country will necessitate the loss of an amount of Grade 3 land or better under any reasonable option.

Suitability

- 8.71 The information set out above, read in conjunction with the appended illustrative masterplan, demonstrates that land off Linthouse Lane is a suitable site.

Deliverability

- 8.72 There is an agreement in place between the landowner and Taylor Wimpey to facilitate the development of the site.

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- 8.73 A considerable amount of technical work has been undertaken to demonstrate the deliverability of land off Linthouse Lane. Taylor Wimpey can confirm that this work concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2036. The site is available now.
- 8.74 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved, such as the strengthening of Wolverhampton's north eastern boundary through landscaping and utilisation of the dismantled railway line as an enduring new Green Belt boundary.
- 8.75 The site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

9. CONCLUSION

9.1 Taylor Wimpey is in control of land at Linthouse Lane, Wolverhampton. The land is sustainably located adjacent to the existing urban area of Wolverhampton.

9.2 Land off Linthouse Lane is promoted as a suitable, deliverable and available site, subject to its release from the Green Belt. The development of the site would constitute sustainable development.

9.3 Taylor Wimpey fully support the Black Country Authorities decision to review the currently adopted Core Strategy, however wish to raise the following concerns:

- The Black Country Core Strategy Review consultation document significantly underestimate the level of housing needed to support future population growth within the Black Country. An independent assessment of OAHN undertaken by Lichfields indicates that the actual need is 4,692 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'.
- 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'.
- 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 objectively assessed housing needs over the course of the Plan period. This should include consideration of land within South Staffordshire District.
- 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.

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- Given the huge housing requirements of the Black Country and the shared housing market between South Staffordshire and the Black Country, it is considered that suitable urban extension sites located within South Staffordshire District would be the logical and sensible locations to meet any remaining unmet housing need. In terms of the relevance of this point to the Black Country Review, it will be important for the Black Country authorities to collaborate with South Staffordshire on cross-boundary issues, and to identify suitable extension sites to the Black Country built area which fall within the planning jurisdiction of South Staffordshire District..
- 9.4 Taylor Wimpey look forward to engaging with the Black Country Authorities and providing additional information, as required, to assist the Council in progressing the preparation of an up to date Local Plan.

APPENDIX 1

Site Location Plan

APPENDIX 2

Black Country Housing Need Report (Lichfields)

APPENDIX 3

Constraints & Opportunities Plan

APPENDIX 4

Illustrative Masterplan