

**From:** [REDACTED]  
**Sent:** 08 September 2017 15:47  
**To:** Blackcountrycorestra  
**Cc:** [REDACTED]  
**Subject:** P17-2135: BCCS Representation on behalf of Richborough Estates  
**Attachments:** P17\_2135\_BCCSIO\_FINAL\_080917.pdf

Dear Sir/Madam,

I have been instructed by Richborough Estates to submit representations to the current Black Country Core Strategy Review Issues and Options consultation. Richborough Estates has secured interest in the following sites that lie with or in close proximity to the Black Country:

- PEDMORE LANE, STOURBRIDGE
- SNEYD LANE, ESSINGTON
- HIGH HILL, ESSINGTON

I would be grateful if you could confirm acknowledgement of these representations, which should be read in conjunction with the call for sites submissions.

Richborough Estates welcomes the opportunity to provide reviews in respect of the review and would welcome further dialogue with the Black Country authorities through the plan making process.

Please do not hesitate to contact me if you require any further information.

Kind regards

[REDACTED]  
Director

**Pegasus Group**

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## ISSUES AND OPTIONS RESPONSE

# BLACK COUNTRY CORE STRATEGY REVIEW

PREPARED ON BEHALF OF RICHBOROUGH ESTATES



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

## Pegasus Group

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APPENDIX 2: SITE LOCATION PLAN SNEYD LANE, ESSINGTON

APPENDIX 3: SITE LOCATION PLAN HIGH HILL, ESSINGTON

## 1. INTRODUCTION

1.1 These representations are made on behalf of Richborough Estates to the Black Country Core Strategy Issues and Options document (June 2017). This representation relates to a number of land interests that lie within the Black Country or in within neighbouring Local Planning Authorities that are capable of delivering new homes to meet needs arising within the Black Country. These sites are as follows:

- Land at Pedmore Lane, Stourbridge (Appendix 1);
- Land at Sneyd Lane, Essington (Appendix 2); and
- Land at High Hill, Essington (Appendix 3).

1.2 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.

1.3 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 Paper<sup>1</sup> 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.**

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<sup>1</sup> DCLG (February 2017) Fixing Our Broken Housing Market

## 2. PURPOSE & 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 Richborough Estates 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 is set out within these representations.

2.3 A Plan period to at least 2036 is generally supported by Richborough Estates 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?*

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- 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.

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### 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 has 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 In respect of the Strategic Market Assessment for the Black Country and South Staffordshire Richborough Estates would wish to raise the following key comments:

- In determining the OAN, there are concerns with regard to the SHMA methodology and 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 do not use the latest economic forecast data and that the methodology translating the job growth into dwelling growth is not sufficiently robust to accurately determine the impact of forecasts based on existing circumstances and also more aspirational job growth targets, such as those arising from the SEP.
- In terms of providing uplifts for market signals, a 25% uplift for South Staffs is appropriate. It is advised that dwelling requirements for the Black Country should not be reduced as a result of this and, accordingly, it should not count towards meeting any unmet needs outside of the HMA as the main function is to provide slack within the housing market and prevent house prices from increasing at an accelerated rate.

4.4 In respect of the Housing Background Report, Richborough Estates would wish to make the following key comments:

- 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 the qualitative assessment of employment informs future land supply recommendations and allocations are revised where necessary.

4.5 As a result of the dwelling requirements generated by the SHMA 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 has been undertaken in order to identify if the sites are fit for purpose, alongside the quantitative employment land study. It has been identified that a number of employment land sites that have been suggested for residential land allocations remain in occupation as functioning employment sites. These sites should be removed from the housing land supply. 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.

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*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.*

- 4.10 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.
- 4.11 The OAN arrived at by the SHMA is generally appropriate in identifying the starting point for determining the dwelling requirement, 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 contain potentially out of date employment forecasts and the methodology to determine appropriate dwelling requirements is 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).
- 4.12 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.

- 4.13 Clearly, the evidence contained in the SHMA does not consider the potential to **accommodate any of Birmingham City's housing needs and that this could result** in increased dwelling requirements. We reserve our position in respect of this matter and await the publication of the HMA wide Strategic Housing Needs Study.
- 4.14 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. We reserve our position on this matter, until the full details and implications for the Black Country are known. 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.
- 4.15 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.
- 4.16 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.

- 4.17 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. Given the issues experienced in respect of delivery in the past, it could be argued that an increased buffer of circa 25% could be applied.
- 4.18 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).
- 4.19 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.
- 4.20 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.*

- 4.21 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.

- 4.22 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, whilst it is forecast at 1.5% per annum in the other two LEP areas. 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. In short, the 1.3% average across the West Midlands Combined Authority Area is substantially bolstered by Solihull and Lichfield and therefore it is very ambitious to suggest this will occur across the Black Country area.
- 4.25 That said, 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. This would not reduce the demographically based housing targets for the area but it 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 a range of 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.

5. REVIEWING THE STRATEGY TO MEET NEW CHALLENGES & OPPORTUNITIES

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

5.1 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.

5.2 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?*

5.3 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).

- 5.4 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?*

- 5.5 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.

*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?*

- 5.6 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?*

- 5.7 No comment.

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.**

5.8 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.

5.9 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.*

5.10 No comment.

*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).*

5.11 Richborough Estates considers that land at Pedmore Lane, Stourbridge should be considered. A call for sites submission has been undertaken in respect of this site to demonstrate availability, suitability and deliverability. This site would represent sustainable options for meeting housing needs arising from within the Black Country.

*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.*

5.12 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.

- 5.13 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.
- 5.14 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.

5.15 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.

5.16 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?*

5.17 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.

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.

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*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?*

5.18 No comment.

*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?*

5.19 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 specified within the Black Country Core Strategy as each site will vary and deserves a more detailed consideration, alongside the developer, 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*

5.20 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?*

5.21 Even if all realistically deliverable options have been considered within the Black Country, there will remain an unmet need for housing. Therefore, it is necessary for the Black Country authorities to 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 South Staffordshire) across authorities and could help deliver the necessary 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.*

- 5.22 Richborough Estates considers there are a number of locations within South Staffordshire that provide geographically strong links with the Black Country and would represent sustainable housing sites. This includes land at Sneyd Lane, Essington and land at High Hill, Essington. A call for sites submission has been undertaken in respect of these sites to demonstrate availability, suitability and deliverability. These sites would represent sustainable options for meeting housing needs arising from within the Black Country.

*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.*

- 5.23 It is important to consider a number of factors, including migration and travel to work patterns, which have been 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 can 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).*

- 5.24 No comment.

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*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).*

5.25 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).*

5.26 No comment.

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

5.27 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.*

5.28 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.*

5.29 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.

5.30 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.

- 5.31 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 Richborough Estates 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 delivery of new housing developments may give rise to the need to deliver supporting infrastructure. Richborough Estates 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.

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## 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.

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*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. CONCLUSION

8.1 Richborough Estates has acquired an interest in a number of sites either within the Black Country or within neighbouring authority areas that are geographically well related to the Major Urban Area. All sites are sustainably located adjacent to the existing urban area as demonstrated on the appended Site Location Plans.

8.2 These sites are promoted as suitable, deliverable and available options, subject to release from the Green Belt. The development of these sites would constitute sustainable development and would assist in meeting housing needs arising within the Black Country and the wider Greater Birmingham Housing Market Area.

8.3 Richborough Estates fully support the Black Country Authorities' decision to review the currently adopted Core Strategy, however wish to raise the following concerns:

- Whilst the OAN is generally appropriate as a starting point, a number of concerns have been identified with the SHMA and it is recommended that it is updated to address the issues raised. Further, evidence is awaited with regard to unmet need in the wider HMA. Once this has been concluded, the Black Country authorities can arrive at an appropriate dwelling requirement for the Black Country.
- It is acknowledged that the housing land supply in the Black Country has not yet been identified as the authorities need to undertake further work upon receiving the Call for Sites submissions. After which, the shortfall in housing supply can be confirmed.
- It is welcomed that the Black Country authorities acknowledge the need to remove land from the Green Belt to meet emerging development requirements and that a Green Belt Review is soon to be prepared.
- In terms of selecting sites for development, it is advised that a range of types sites, of different sizes, in different locations need to be identified to be in the best possible position to deliver the dwelling requirements.
- Land at: Pedmore Lane, Stourbrige; Sneyd Lane, Essington; and High Hill, Essington, represent appropriate locations for residential development as supported by the Call for Sites submissions.

- 8.4 Richborough Estates 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.

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# APPENDIX 1

Site Location Plan  
Pedmore Lane, Stourbridge



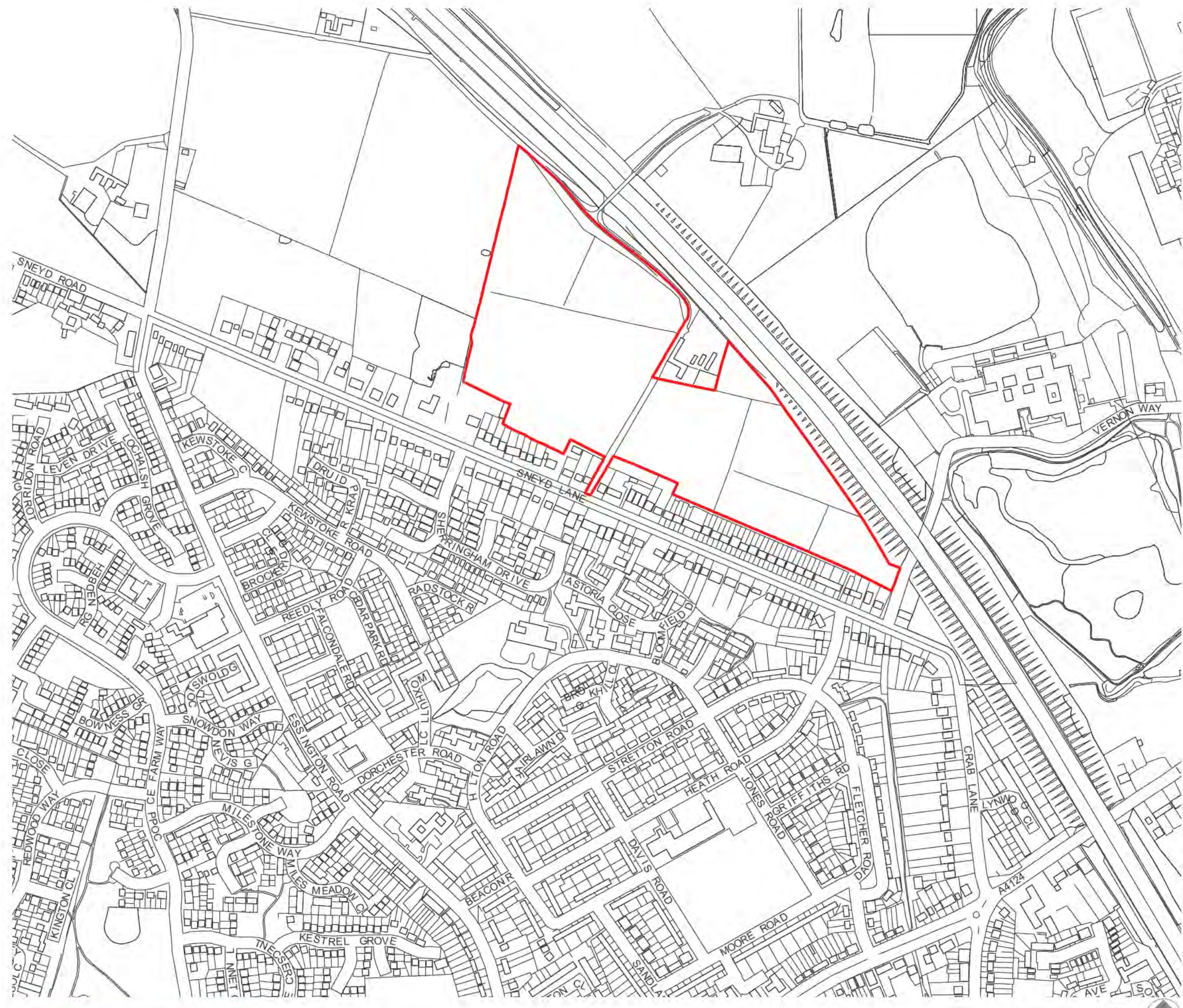
# APPENDIX 2

Site Location Plan  
Sneyd Lane, Essington

KEY



Site boundary



Sneyd Lane, Essington

Client: RICHBOROUGH ESTATES

Site Location

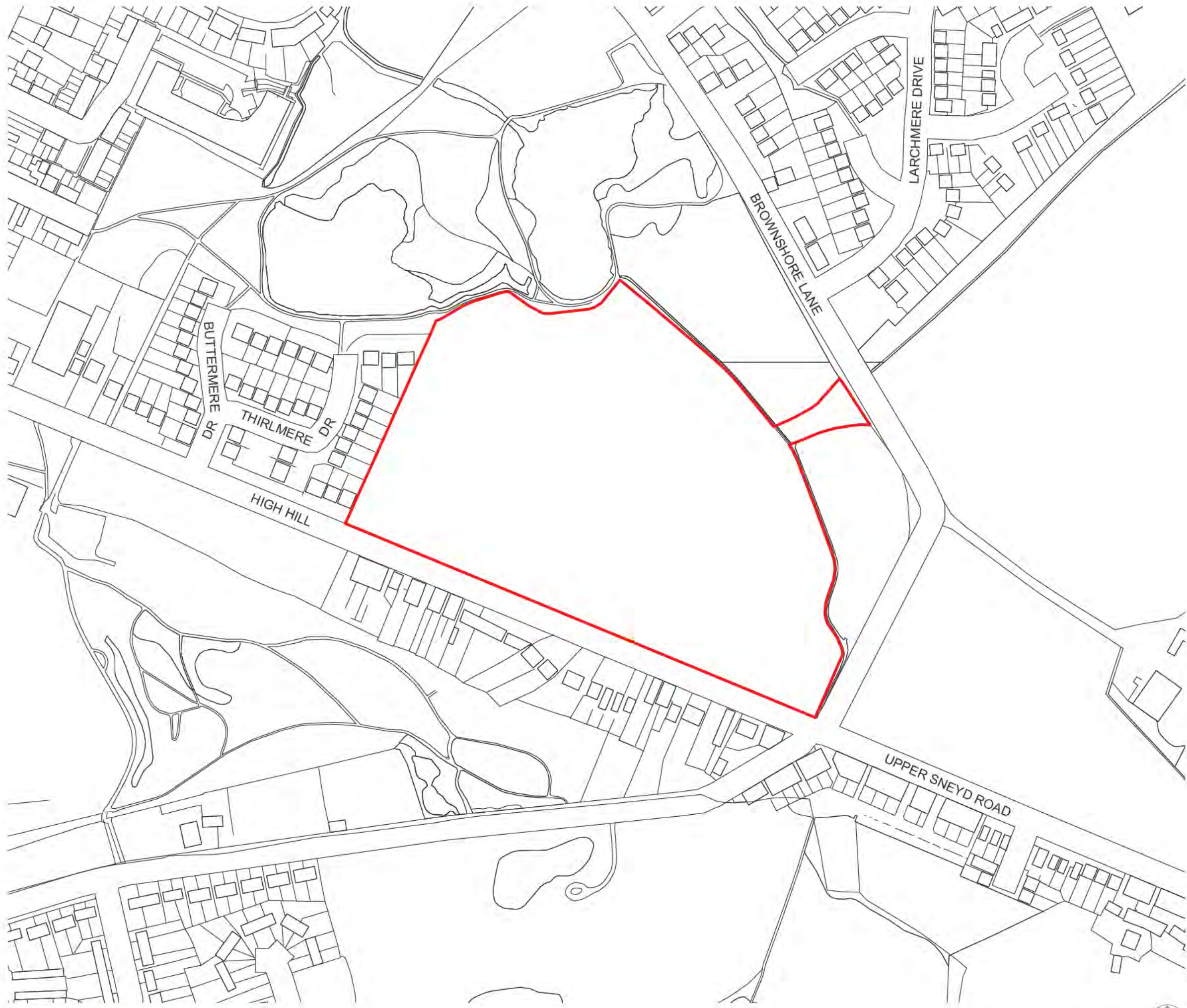
Drawing no. : P17-2137 01  
Date : 05/09/2017  
Drawn by : JT  
Checked by : DRAFT  
Scale : 1 : 5000 @ A3



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# APPENDIX 3

Site Location Plan  
High Hill, Essington



**KEY**

 Site boundary

High Hill, Essington

Client: RICHBOROUGH ESTATES

**Site Location**

Drawing no. : P17-2138 01  
 Date : 05/09/2017  
 Drawn by : JT  
 Checked by : DRAFT  
 Scale : 1 : 2500 @ A3

