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Black Country Core Strategy Review
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Dear Sir/Madam

BLACK COUNTRY CORE STRATEGY ISSUES AND OPTIONS CONSULTATION

REPRESENTATIONS ON BEHALF OF DR BALJIT BHANDAL

Harris Lamb Property Consultancy (HLPC) is instructed to submit representations to the Black Country Core Strategy Issues and Options Consultation document by Dr Baljit Bhandal (the “**Client**”).

Our representations are structured around the questions posed in the Issues and Options consultation and are set out in number order for ease of reference. We have also submitted a representation to the Call for Sites Submission in respect of land in my Clients control in Dudley MBC. We would welcome the opportunity to discuss these representations with you further if that is assistance.

In summary, it is our view that the proposed review does not go far enough and that it seeks to rely too heavily on the adopted strategy that was based on a very different set of circumstances. The result is that the revised plan is in danger of not incorporating sufficient flexibility to deliver the significant quantum of housing and employment land that the Black Country requires during the course of the emerging plan period. This stems from a desire to continue to place a significant reliance on the urban capacity, which has already proven to be problematic and slow to deliver, and against a back drop of a position where the Black Country Authorities (“**BCAs**”) accepts that large volumes of development will need to be delivered outside of the existing urban area. The emerging plan should be prepared to be flexible and to facilitate the prompt delivery of available housing and employment sites. In order to achieve this a comprehensive review of the plan is required and a range of different sites should be identified for development in a number of different locations in order to provide choice and competition in the market for land and to enable the

significant housing and employment requirement to be met, whilst securing the various economic and social benefits these deliver.

Question 1 – Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing Spatial Strategy, updating existing policies? Yes/No; If not, what do you think should be the scope of review?

No.

It is our view that a comprehensive review of the existing Black Country Core Strategy (“**BCCS**”) is required. The reason for this is that there have been significant changes to almost all of the factors relevant to the consideration of the Core Strategy. Consequently, anything less than a full review would fail to properly consider the implications of these and would not allow for a comprehensive strategy to be developed to ensure the sustainable delivery of the development needs now identified. These changes are summarised below:

- The position with regard to national and regional planning policy and guidance has changed considerably. The development requirements and the distribution of development in of the BCCS are based upon the revoked West Midlands Regional Spatial Strategy and the BCCS was produced prior to the adoption of the Framework.
- There has been a significant shift in the amount of housing and employment land that needs to be delivered, which has been informed by a new evidence base. The identified increase in need has resulted in the urban capacity being saturated and we are now in a position where a large amount of development will need to be delivered outside the existing urban area. This is a significant change and brings with it new challenges and considerations that will need proper consideration.
- The current economic climate has changed significantly since the production of adopted Core Strategy. This has resulted in:
 - sites identified for housing actually having a new lease of life as employment sites and not as much surplus employment land suitable for housing as anticipated as explained in paragraph 2.5 of the Issues and Option Document.
 - The value of employment land rising, reducing the incentive for owners of employment sites to sell. This is particularly pertinent given the level of occupied sites that need to be made available just to meet the allocated / committed sites.
 - Combined both of these factor call into question the amount of housing and timing of delivery on these sites and will require significant discounts to be applied to this source of supply.
- The delivery approach outlined by the adopted BCCS has proven to be problematic, with delivery levels in the Regeneration Corridors significantly below that planned for. Housing delivery has been heavily supplemented by unexpected high levels of windfall sites, which has served to mask the problem. But this level of windfalls cannot be relied upon to occur

again and the issue with delivery in the Regeneration Corridors confirms the unpredictability of relying on occupied employment site that are often in multi-ownerships. It also confirms the uncertainty and problematic nature of delivering brownfield sites in an established urban area that was not originally designed to meet modern day standards. Furthermore, even with the high levels of windfalls, the delivery of housing at the end of the 2015/16 year was still 3010 below the lower annualised housing target of 2625 dwellings per annum. Given the annualised OAN is now shown to be between 3432 – 3551, something clearly needs to change if these numbers are going to be met, rather than continuing to focus on a failing strategy.

- We understand from our contacts that funding, although available, has proven to be time consuming and difficult to access. Given the significant amount of external funding that is likely to be needed to make the 300 hectares of occupied employment land come forward for housing (paragraph 2.10 of the I&O document), this will impact on deliverability or whether a site can be considered developable, which are the tests set in Paragraph 47 of the Framework for housing allocations.

A new strategy is, therefore, required which will provide a range of sites on both brownfield and greenfield (including Green Belt) land which are capable of being delivered in the plan period and are attractive to the market and viable. There are inevitably limitations as to how many dwellings can be delivered on one large site, when lead in times and build out rates are taken into account. So whilst larger sites will need, it is, therefore, our view that the emerging plan should seek to direct development to sites that are deliverable within the plan period.

This approach is entirely consistent with the requirement of the Framework, which requires Local Authorities to “boost significantly” the supply of housing land. In accordance with the requirements of footnotes 11 and 12 of the Framework, housing sites should be “deliverable” and “available” in order to be allocated. The employment land led Regeneration approach of the emerging Core Strategy has failed this test at least to some degree. A more flexible and dispersed approach is needed and compliant with the Framework.

Question 2 – Do you think the key evidence at 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 which should be taken into account in considering development on any particular sites and in any particular area, please provide details.

No.

A more in depth analysis of brownfield land take up rates is needed, particularly in relation to employment sites that are expected to deliver housing to ensure that they are a credible source of supply. Allot of these sites are occupied and in multiple ownership and so this will need to include clear evidence about how land assembly will be achieved. We have reviewed the four authorities

Annual Monitoring Reports (although the latest AMR for Wolverhampton dates back to 2013/14) and whilst delivery in the Regeneration Corridors is touched upon, it is clear that completions are limited and commitments are being used to divert attention. A much clearer analysis of this position with regard to delivery rates achieved and those predicted going forward is needed.

We support the inclusion of the Green Belt review, although we consider it is imperative that this is prioritised. This is an important document in defining the amount of the identified need that can be accommodated in the Black Country Authority administrative areas and the extent and will ultimately be a key piece of evidence in defining the strategy. Currently it is stated that the Green Belt review will not be completed until mid-2018, with the Preferred Options consultation being undertaken in September 2018. In this context, we are concerned that there is simply insufficient time for the Authorities to properly digest the findings of the Green Belt review and properly consider/action the matters identified above.

Question 3 – Do you agree that the housing need identified for the Black Country over the plan 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.

No.

We have a number of concerns that need to be addressed:

- The emerging SHMA should have tested whether the HMA boundary remains valid for the purposes of its assessment, rather than just seeking to build upon the work undertaken to establish the Greater Birmingham HMA as part of the preparation of the Birmingham Development Plan. It is commonly accepted that HMAs overlap and the HMA for Birmingham will not be exactly the same as that for the Black Country.
- It is not clear from the SHMA how the backlog against the adopted BCCS has been dealt with. The only reference to a 'backlog' relates to a notional figure for the shortfall for the period 2011-2014 against the SHNS suggested annual need figure. No reference is made to the period between 2006 and 2011.
- The SHMA does not fully address affordable housing requirements, which is contrary to the guidance in the Planning Practice Guidance ("**PPG**"), which requires the SHMA to "address the need for all types of housing, including affordable housing and the need for different groups in the community". Affordable housing need is not a direct component of the demographic part of the objectively assessed needs assessment and so a 'policy on' calculation is required in this regard. The SHMA advises that it is for the client Authorities to consider whether more new homes over and above the housing needs figure identified in the SHMA should be provided to address affordable housing need through policy adjustments. From our perspective, it does not matter who undertakes this exercise, it just

needs to be undertaken to ensure the housing need figure complies with the guidance in the PPG.

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.

We have no particular concerns with the quantum of employment land identified. It is noted that there is a significant gap between the anticipated requirement for employment land and the supply of employment land.

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

We agree that the evidence clearly demonstrates that a Green Belt review is needed to meet the development needs identified and that this is an essential component of the new Core Strategy.

However, it is also our view that the Green Belt review should extend beyond the current plan period in accordance with the Framework, which explains that when undertaking Green Belt reviews local authorities should consider revised Green Belt boundaries having regard to their intended permanence in the long term so they are capable of enduring beyond the plan period. In this context, it is highly likely that the need for housing and employment land will continue to grow and that capacity in the urban area will not exist to meet these needs. Consequently, safeguarded sites will also need to be identified. It is our view that the period up to 2051 should be considered. This is 15 years beyond the end of the existing plan period and links to the time period that local authorities are required to identified a supply of sites for (Paragraph 47).

Whilst the Green Belt review might be undertaken by the BCAs and South Staffordshire, it is important that the review is not just confined to their administrative area. Other authorities also directly adjoining the BCAs and an understanding of the function of the green belt along these boundaries is also important so that all the options available to deliver the housing need are considered.

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 the Core Strategy review? Yes/No; if not, what other key issues should be taken into account?

We respond to the identified key issues as follows:

- We agree the existing evidence base for the adopted BCCS is dated; however, for the reasons identified above, we do not consider that a selective review of the

evidence base is appropriate. A comprehensive review of the evidence base is required.

- We agree that there is a need to continue to plan for a growing population. However, the volume of housing as identified by the Council that will need to be developed in the Green Belt is too great to say that brownfield sites will be prioritised. This is before our concerns with regard to the delivery of these brownfield sites are taken into account, which would serve to put further reliance on sites outside the urban area.
- In terms of the identification of employment land, this should also make reference to the 'right type' of land. It is not just about the quantum of land, but making sure that sites meet the needs identified in the Economic Development Needs Assessment ("EDNA").
- We agree that the Green Belt review is essential to the emerging Core Strategy given the lack of urban capacity.

Question 7 – Do you think that the Core Strategy provision and sustainability principles remain appropriate? Yes/No; if not, what alternative would you suggest?

We are content with four of the five Core Strategy provisions and sustainability principles, but the fourth bullet point "brownfield first" is no longer appropriate. By necessity the reliance on brownfield development will need to be significantly reduced and it is already acknowledged that at least 22,000 to 25,000 new dwellings and 300 hectares of employment land may have to be allocated on greenfield/Green Belt sites. As referred to in above, we are of a view that the number of dwellings should actually be higher than this, which would further emphasise the role of greenfield sites.

The brownfield first requirement is also not in accordance with the guidance in the Framework. The Framework identifies 12 Core Planning Principles at paragraph 17. Here the Framework seeks to "encourage" the effective use of brownfield land. It does not, however, make it sequentially preferable to greenfield sites. The Framework acknowledges that there are instances where the development of greenfield land is preferable to brownfield sites for a variety of different reasons. This should be reflected in the emerging Plan.

It is also important to draw a distinction between the concept of 'brownfield first' approach when considering whether urban capacity exists to meet the development needs identified, and an attempt to rank brownfield and greenfield sites when it has been identified that a significant volume of greenfield sites are needed to meet the development needs. It was suggested at the public consultation event I attended that phasing of greenfield sites was being considered. This would be wholly inappropriate. Greenfield sites will represent such a large number of dwellings that leaving them to be considered for another day would undermine their delivery. The role of greenfield sites is also not only important in terms of overall numbers, but also providing more certainty in delivery

in the short term. Currently we think the 5 year housing land supply positions presented for the BCAs are overly optimistic and greenfield sites will be needed if sufficient delivery is going to be achieved in the early years of the plan to address the existing backlog and more generally the increased annual requirement.

Question 8 – Do you think the Core Spatial Strategy objectives remain appropriate? Yes/No; if not, what alternative would you suggest and how might these changes impact on individual Core Strategy policies?

We are concerned with Objective 3, which seeks to model sustainable communities on redundant employment land in the Regeneration Corridors. This objective needs to be widened to take account of the large volume of greenfield sites that will be needed to meet the development needs identified.

Question 9 – Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside of 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?

We agree that the policies should be revised. A Growth Network focused strategy will not provide the level of new housing and employment required by the emerging Core Strategy. The strategy needs to be amended to reflect the fact a significant proportion for housing and employment development will need to take place on greenfield/Green Belt sites outside of the current urban boundary.

The presumption in favour of using brownfield sites first also needs to be revised, as referred to above. The Core Strategy needs to provide a deliverable portfolio of residential and employment sites and with such a heavy reliance on greenfield sites this approach is no longer relevant.

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

We have no specific comments regarding the extent of the individual Regeneration Corridors. However, the nature of the areas identified for residential and employment growth will need to be expanded to include sites delivered outside the existing urban area.

Question 11a – Do you support strategic Option 1A? Yes/No.

We consider that Option 1A is to be preferred to strategic Option 1B. That said, we believe there continues to be an over reliance upon brownfield sites in the existing housing supply and there is

also an over reliance on brownfield windfalls in estimating future housing supply. We consider that overall the greenfield requirement should be increased to ensure delivery. Greenfield sites are typically less constrained than their brownfield alternative and, unlike a significant number of its active occupied employment sites allocated for housing by the adopted Core Strategy; they are available for development now.

Question 11b – Do you support Option 1B? Yes/No.

We do not support Option 1B. We believe it places an over reliance on brownfield/windfall sites and there is no real certainty that further employment land can be released over the plan period to provide housing opportunities. Indeed, current evidence already suggests that the reliance on occupied employment sites is failing to secure the delivery of a sufficient number of houses in order to meet the current annualised target which is well below what will be needed following the review.

In this context, we consider that Option 1B would not meet the objectives of the housing policies of the Framework, particularly those that require the planning system to “boost significantly” the supply of housing land and to ensure that the allocations are deliverable and developable in the context of the requirements of paragraph 47 of the Framework.

Question 12a – Do you support spatial Option H1. Yes/No. What criteria should be used to select sustainable sites? E.g. the ability to create new Green Belt boundaries, size, access to existing residential services.

It is clear that a combination of Options H1 and H2 will be required to deliver the significant housing requirement of the Core Strategy review. To provide a realistic prospect of achieving the housing requirement a range of sites of a variety of different sizes and locations should be identified for development in sustainable locations within the HMA. Identifying a range of sites in a variety of different locations will help create the choice and competition of the market for land and ensure delivery. It must be ensured that any proposed urban extensions are deliverable within the plan period and that, if larger sites are identified, only the part that is deliverable in the plan period is included in the supply figures. It is, therefore, necessary to understand the infrastructure requirements, likely delivery rates and the ability of sites delivered quickly when making allocations.

Question 13a – Do you support spatial Option H2? Yes/No; what should the characteristics of sustainable urban areas be?

See our response to Option 12a.

Questions 16-19 seek to establish whether support exists for the four spatial options identified and what selection criteria should be used (e.g. quick motorway access). Question 20 asks if any further spatial options should be considered.

Our response to these questions has been combined for the simple reason that we consider all four options will need to be considered. The reason for this is due to both the significant volume of additional employment land that needs to be identified and the need for a range of sites in terms of scale and nature to be identified. All options therefore need to be considered to ensure that the right types of sites are identified to meet the need identified in the EDNA and to attract the right occupiers.

The EDNA identifies a need for strategic/premium and local quality employment sites, with the majority of the need relating to the former. The EDNA also identifies that the bulk of inquiries relates to logistics and manufacturing. Combined these clearly lead to a conclusion that a large proportion of the new employment land will need to be directed toward the strategic network corridor (i.e. M5, M6 and M54). These locations will not only meet the need identified, but will also be attractive to high profile occupiers, which can act as a catalyst to build upon and improve the growth seen in recent years. I54 is prime example of this and it was only because South Staffordshire Council, combined with the BCAs, had the foresight to make this site available in this strategic location that JLR considered it as a potential location. In that particular instance, JLR were also considering locations outside of the UK, so the loss could have been a national one, rather than just a regional one. By securing these high profile occupiers this also presents the opportunity for other companies to secure significant spin off benefits (e.g. those in the supply chain).

The focus on the strategic highway network is essential, but will limit the search area, because the focus will be on the M5, M6 and M54 corridor. What is evident on a review of these corridors is that currently strategic employment sites (i.e. i54 and four ashes) are located to the north of the conurbation and that there is currently nothing of this nature to the south of the conurbation. Exploring a strategic employment site to the south of the conurbation near to junction 3 of the M5 should, therefore, be a priority. This location also has good access back to the workforce.

Harris Lamb has one of the largest and most successful industrial agency teams within the West Midlands. It is clear from their extensive experience and contacts that if a site was delivered near Junction 3 of the M5 that occupiers would be identified very quickly and delivery secured on the ground. This is important if the BCAs want to continue to build upon recent successes.

Question 21 – Do you think that changes are required to Policy DEL1 to ensure it covers both development within the existing urban area and within the Green Belt? Yes/No.

Yes. Policy DEL1 needs to be revised to take account of the fact that current evidence clearly demonstrates that development will be required in the Green Belt.

Question 25 – Will there be 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.

We suspect that generally speaking there will need to be an incremental improvement of social infrastructure provision to meet the requirements of occupants of new developments over the plan period. This should inform the identification of sites and the review of the Growth Network. Sites that can be delivered and take advantage of existing social infrastructure should be prioritised for allocation above sites that have significant infrastructures required. In short, development should be favoured where it has good access to a range of services and facilities.

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, whilst at the same time bring forward sites on the Green Belt? Yes/No.

We have commented previously that the new BCCS will need a change of emphasis in light of the significant amount of development that will need to be delivered outside of the existing urban area. This conclusion followed a review of the urban capacity and so the focus on urban regeneration has already been secured by ensuring that the capacity of the urban area is maximised. It is only because it has been maximised that Green Belt can be justified.

We should add that, in our experience, the Black Country Local Authorities do need to understand the constraints to developing in the Black Country, particularly in respect of highways and urban design standards. Many of the existing allocations are difficult to develop and the Council will need to apply development management considerations flexibly in order to ensure the site can come forward. Many brownfield sites present physical and topographical challenges which can influence the formation of layout and design solutions. All of these are factors which should be taken into account when identifying sites for development and determining subsequent planning applications.

We understand that consideration is being given to a phasing policy for the greenfield sites. Such a policy would be wholly inappropriate and contrary to the Framework and PPG. The amount of development that will need to be delivered outside the existing urban area is far too great for such a policy to be considered and greenfield sites will be a key component to ensuring that a rolling 5 year supply of sites can be maintained across the plan period as required by Paragraph 47 of the Framework.

Question 31 – Do you think 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?

Our concern is that it takes a considerable amount of time to make funding available for new development and this is holding back sites from being released. Furthermore, it cannot be guaranteed that funding which is provided now will continue to be available during the plan period. In this context, it is important to ensure that there is a balanced supply of housing provided; taking into account that intervention funding may not always be available or might not be acceptable to a sufficient volume of developers. We suggest that a greater proportion of development should be directed towards greenfield/Green Belt sites that are less likely to require intervention.

Question 35 – Do you support the proposed approach to housing land supply? Yes/No.

We do not favour the prioritisation of brownfield land over greenfield land. This is not a Framework compliant approach. Given the considerable amount of housing required across the plan area it is necessary for both greenfield and brownfield sites to be released at the same time. Indeed, the greenfield/Green Belt sites are likely to serve different areas of the housing market, given their geographical detachment in the large parts of the Growth Network and will provide a different type of development sites.

In terms of a discount rate it is now evident that the Growth Network has not delivered houses as expected. It is, therefore, our clear view that there should be an increase in the discount rate that should result in the overall housing requirement being increased relatively significantly. An alternative would be to over allocate and provide reserve sites in line with the LPEG report. This would see a 20% increase in allocations through the identification of reserved sites that could be drawn upon where a 5 year supply cannot be demonstrated.

We make no comment at this stage about proposals for high density allocations within the strategic centres other than to say that market research should be carried out to ensure there is both demand and an appetite from the housebuilding industry to provide this type of product.

Question 40 – Do you agree that the 2017 SHMA findings should be used to set the general house type targets for the plan period? Yes/No.

No. The SHMA does not fully assess affordable housing requirements as referred to above. As such, it cannot actually dictate an overall mix. In addition, housebuilders will provide housing to meet their assessment of localised market needs. This will change throughout the plan period. A static policy that does not flex during the course of the existing plan period would be inappropriate.

We would also suggest that housebuilders have a better understanding of market requirements than the Local Authority.

Question 42 – Do you agree that the annual affordable housing target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? Yes/No.

We believe it would be prudent to keep the affordable homes target as originally set. Increasing it could create viability problems prevent the delivery of housing.

Question 43a – Do you think that the existing Policy HOU3 site size threshold should be kept at 15 homes or more? Yes/No.

We believe that the site size threshold should be retained at 15 dwellings. This will assist in the delivery of smaller sites by smaller housebuilders.

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 site? Yes/No.

Yes, we agree the figure should be retained at 25% subject to viability.

Question 45 – Should an increase in affordable housing requirement be set for Green Belt release sites, to reflect the likely financial viability of these sites? Yes/No.

The development of greenfield/Green Belt can have significant costs associated with it. It is more likely to require new below ground infrastructure be provided such as drains, power supply etc. than brownfield land. Other physical and sociable infrastructure contributions will also be required such as education, transport etc. Therefore, greenfield sites are not necessarily more able to contribute to affordable housing than brownfield sites. We therefore believe the flat rate of 25% affordable housing provision across the plan area. The 25% provision should be subject to viability.

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

We believe that Policy EMP1 should provide a net employment land target in order to allow for losses to alternative uses to be taken into account.

Question 95a – Do think Garden City principle should apply to the Black Country? Yes/No.

The use of the term is misleading and for many will invoke tree line streets, low density development, etc., rather than the underlying principle of creating new planned settlements where people can live, work and play. It is also misleading because no new towns are being proposed. A review of the TCPA website reveals that a number of the principles identified are things that fall within current planning guidance (e.g. Promotion of sustainable transport methods, the relationship between jobs, services and homes, etc.) It would be more appropriate to draw out the principles that are relevant to the Black Country and that acknowledge that the Black Country is an established urban area of a large number of interlinked settlements.

Question 99c – Do you think that National Space standards for housing development should be introduced to the Black Country? Yes/No.

No.

If the BCAs are going to explore the implementation of the Nationally Described Space Standard then this will need to be justified in line with the PPG, which requires account to be taken of the following:

- need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions

It is likely that there will be some significant implications on the viability of developments if the NDSS is progressed. Where viability is not effective, this is likely to be where the housing market is strongest and where it is more difficult for younger people to access the housing market. Increasing house sizes of the smallest units could price exclude those with smaller budgets. So there are potential negative effects across the Black Country to be considered. With viability likely

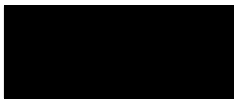
to be a factor on a large number of sites, the resultant loss/reduction of affordable housing provision and other s.106 obligations, will need to be balanced against securing the NDSS.

Question 101a – Do you support the proposed changes relating to flood risk, sustainable drainage and urban heat island effects? Yes/No.

Whilst we appreciate the need to have regard to new standards regarding SuDS provision, the implications on site layout and viability do need to be considered. A flexible approach is required from the Local Authorities in assessing individual schemes taking into account matters such as viability and the impact on density. In particular, a joint approach is needed by statutory undertakers to ensure that SuDS areas can be adopted if they are provided as part of wider open space areas.

We trust you have found these representations useful. If you have any queries, or would like to discuss this matter further, please do not hesitate to contact me.

Yours Sincerely

A black rectangular box used to redact the signature of Sam Silcocks.

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