



Dudley Planning Policy Department
Directorate of Place
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West Midlands
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Date: 8 September 2017

Our Ref: M5/1206-18
M5/0406-06
M5/0507-13

Your Ref:

By email only:

blackcountrycorestrategy@dudley.gov.uk

Dear Sirs

RE: Black Country Core Strategy-Issues and Options Report (June 2017)

We represent the **West Midlands HARP Planning Consortium** which includes all the leading Housing Associations Registered Providers (HARPs) across the West Midlands. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

Question 5 - Do you agree with the proposed approach to the Black Country Green Belt Review?

In the context of a limited supply of brownfield and other opportunities within the existing Black Country Core Strategy area to accommodate substantial housing development we welcome the proposal to release some land from the Green Belt. By undertaking a thorough review of Green Belt opportunities and constraints the Council will be meeting the NPPF requirement to promote sustainable patterns of development.

Question 41a - Do you support the introduction of a policy approach towards self and custom build housing in the Core Strategy?

Should the Council introduce a policy approach towards self and custom build housing, any requirement should not be in place of traditional affordable housing requirements. Self and custom build has complex requirements for funding and as such is out of the reach of most households who seek affordable housing. Self and custom build is also not within the affordable housing definition of the NPPF. Any policy requirement should be fully tested in terms of its viability when assessed alongside all other policy requirements to ensure that any requirement will not result in affordable housing being reduced on viability grounds.

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.

Paragraph 158 of the National Planning Policy Framework (NPPF) requires local planning authorities Local Plan to be based upon adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics of the area. The Council's own evidence document, the Strategic Housing Market Assessment Part 2-Objectively Assessed Need for Affordable Housing (June 2017) (SHMA) states that the authority should aim for 28.6% of new housing to be affordable housing (this figure includes starter homes).

Paragraph 47 of the NPPF clearly sets out the Government's aim to "boost significantly the supply of housing". To achieve higher housing supply local authorities should:

“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area”.

There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.

Question 49a – Is there still a need for existing Policy DEL2 in order to manage the release of poorer quality employment land for housing?

With regards to **Question 49a**, we would encourage the Council to consider the wording of paragraph 22 of the NPPF which asserts 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. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

Employment land has not been designated in perpetuity so if suitable and more practical uses are available we suggest that the Council takes this into consideration, via a more flexible policy; this will ensure that the Local Plan is in accordance with national policy and therefore passes the tests it will be assessed against in order to be found ‘sound’ at the eventual examination.

Other comments

The SHMA is clear on the increase in need for all tenures, of all sizes. In translating these needs into suitable policies the Council should look to involve Housing Associations as far as possible in setting a local definition of affordable housing that will encourage delivery of all affordable housing types. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local Housing Associations should be emphasised in the Plan policies.

The Council’s SHMA highlighted a need for 162 new sheltered and extra care homes every year to meet the needs of the ageing population however there is no policy on older peoples housing within the document. We are of the opinion that a separate policy is needed to fully represent the needs of housing and care for older people.

Example policy wording is:

“Care, Continuing Care Retirement Communities and Extra Care Housing

The Council will, through the identification of sites and/or granting of planning consents, provide for the development of residential care homes, nursing homes, close care, extra care and assisted care housing, and Continuing Care Retirement Communities which encompass an integrated range of such provision.

In identifying sites and/or determining planning applications, regard will be had to:

- *Commission for Social Care Inspection and other operational requirements;*
- *Locational sustainability. Suitable sites at defined settlements will be prioritised, but where such sites are not available regard will be had to the availability of public transport and the potential for developments to be self-contained, thereby reducing travel requirements;*
- *The potential to co-locate a nursing/residential care home and other care related accommodation on the site where there are demonstrated needs.*

The Council will also work with its partners Dudley Metropolitan Borough Council, Sandwell Metropolitan Council, Walsall Council and the City of Wolverhampton Council and the relevant Primary Care Trusts in identifying suitable sites and securing the provision of schemes.”

The above comments are intended to be constructive, to ensure the Local Plan is sound. We would like to be consulted on further stages of this document and other publications by the Council, by email only to consultation@tetlow-king.co.uk; please ensure that the **West Midlands HARP Planning Consortium** are retained on the consultation database, with **Tetlow King Planning** listed as their agents.

Yours faithfully



**JULIE O'ROURKE MPLAN
PLANNER**

For and On Behalf Of
TETLOW KING PLANNING

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