
Black Country Core Strategy: Issues and Options Consultation (September 2017)

Consultation Representations

Prepared on Gallagher Estates

September 2017

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Consultation Responses

Prepared on behalf of Gallagher Estates

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Appendix 5: Landscape, Visual and Green Belt Appraisal (September 2017)

1.0 INTRODUCTION

- 1.1 We write on behalf of our Client, Gallagher Estates, in relation to their interests at land at Yieldfields Farm in Bloxwich ('the Site'). Gallagher Estates welcome the opportunity to be involved in the preparation of the review of the Black Country Core Strategy, and it is within this context that they wish to make representations to the Black Country Core Strategy Issues and Options Consultation.
- 1.2 The Site is shown outlined in red on Drawing RG-M-30 (**Appendix 1**) and is located on the northern edge of Bloxwich. The Site falls within two administrative authority boundaries; the southern part of the Site lies within Walsall Borough and the northern part is within South Staffordshire District. The Site falls within the Green Belt. The Site extends to 122 hectares and has the potential to deliver 2,000 new homes alongside the provision of local services and facilities as well as significant open space in a sustainable location.
- 1.3 A Development Framework Document is included at **Appendix 2**, which provides analysis of the Site's location and context; a review of the Site's landscape and visual appraisal and Green Belt location; a review of the planning policy position; and two proposed masterplans (showing how the Site could be phased) for consideration.
- 1.4 Details of the Site, including the Development Framework Document, have also been submitted as part of the Call for Sites exercise which runs alongside this Issues and Options Consultation.

2.0 QUESTION 1

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

- 2.1 Yes. Paragraph 153 of the National Planning Policy Framework (NPPF) states that each local planning authority should produce a Local Plan for its area and that this can be reviewed in whole or in part to respond flexibly to changing circumstances. Furthermore, the Planning Practice Guidance (PPG) identifies that for plans to remain effective, they need to be kept up-to-date. The PPG highlights that policies will age at different rates depending upon local circumstances and that most local plans are likely to require updating in whole or in part at least every five years. The PPG also advises that Local Plan reviews should be proportionate to the issues in hand (Paragraph: 008 Reference ID: 12-008-20140306). Gallagher Estates agree that a partial review is sufficient, if the following can be achieved:
- a. **Updated housing targets are included.** Since the adoption of the Core Strategy in 2011, a number of new challenges have emerged as well as significant changes in circumstances for the area. Importantly, the national economic situation has changed as the existing Core Strategy was prepared whilst the Black Country was recovering the global recession of 2008. At the time, the recession affected house building across the Black Country and therefore updated housing targets will need to be considered as part of the Review.
 - b. **Birmingham's housing shortfall is taken into account.** With further regard to the need for housing and the wider Housing Market Area (HMA), the PPG states that local planning authorities should consider whether plan making activity by other authorities has an impact on planning and the Local Plan in their area (Paragraph: 008 Reference ID: 12-008-20140306). The Birmingham Development Plan (BDP) was adopted by Birmingham City Council on 10th January 2017. The BDP identifies that Birmingham currently have an unmet housing need of approximately 37,900 dwellings. As highlighted in the Issues and Options Consultation Document (July – September 2017), this unmet housing need will need to be met by neighbouring authorities in the Birmingham HMA through the Duty to Cooperate. Therefore the Review will need to take account of Birmingham's housing shortfall to ensure that sufficient land for housing is identified.
 - c. **Sustainable Green Belt sites released for new housing.** In light of the above, in order to ensure sufficient housing land can be delivered, it is considered that sustainable Green Belt sites will need to be removed from the Green Belt for new housing. This accords with

the findings of the Greater Birmingham LEP and Black Country Local Authorities Strategic Housing Needs Study (SHNS) (Stage 3) (August 2015) which assesses the future housing needs across the sub-regional housing market area. The SHNS Stage 3 Report concludes that if the Green Belt is maintained in its current form, it is very unlikely that the Greater Birmingham HMA will be able to accommodate the strategic housing shortfall that has been identified.

d. **The Review is based upon up-to-date and robust evidence.**

2.2 Overall Gallagher Estates support the partial review of the existing Core Strategy, subject to the above being achieved.

3.0 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 any particular issues that should be taken into account considering development on particular sites or in any particular areas, please provide details.

- 3.1 Yes. As stated in our response to Question 1, the Review will need to be based on up-to-date and robust evidence. Paragraph 158 of the NPPF states:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

- 3.2 Table 1 in the Issues and Options Consultation Document (July – September 2017) sets out the full evidence base that will inform the Black Country Core Strategy Review and Gallagher Estates agree that the listed evidence base documents will be sufficient to support the key stages of the Review.
- 3.3 In particular, Gallagher Estates are supportive of the preparation of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study and the Black Country Green Belt Review. However, it is important to note that a methodology for the Green Belt Review has yet to be published.

4.0 QUESTION 3

Do you agree that the housing need identified for the Black Country over the period 2014-2036 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.

- 4.1 No. Whilst Gallagher Estates support the on-going joint working between the Black Country Local Authorities and South Staffordshire District Council, Gallagher Estates do not agree with the identified Objectively Assessed Housing Need (OAHN) set out in the Black Country and South Staffordshire Strategic Housing Market Assessment (SHMA) (March 2017). Accordingly, Barton Willmore LLP's National Research Team have prepared a Housing Need Technical Review of the Black Country and South Staffordshire SHMA (attached at **Appendix 3**). The Housing Need Technical Review has been prepared in the context of the NPPF and the stepped approach prescribed by the PPG's OAHN methodology. Accordingly, the Housing Need Technical Review focuses on whether the Objectively Assessed Housing Need (OAHN) of between 81,193 and 84,123 dwellings (3,691-3,824 dwellings per annum), 2014-2036 as identified in the SHMA, will provide for the full OAHN in the Black Country Housing Market Area (HMA) as required by the NPPF and PPG. The Housing Need Technical Review does not seek to address the issue of unmet need from surrounding authorities (in particular, Birmingham), and this unmet need should be in addition to the identified OAHN for the Black Country HMA.
- 4.2 In line with the PPG's OAHN methodology, the Housing Need Technical Review addresses the demographic projections presented in Section 4 of the SHMA; addresses the approach and results reported in Section 6 of the SHMA concerning the number of homes needed to support future job growth across the Black Country Housing Market Area (HMA); and examines the market signals evidence presented in Section 5 of the SHMA. A summary of the findings of the Housing Need Technical Review is set out below.

Demographic Projections

- 4.3 The Black Country and South Staffordshire SHMA concludes that its preferred demographic scenario is the 2014-based sub-national population projections (SNPP) with an additional for under-delivery between 2011 and 2014 (2,689 dwellings). This results in a starting point OAHN of 3,760 dwellings per annum (2014-2036).
- 4.4 Barton Willmore's analysis has shown that no adjustment is made for household formation suppression in the Black Country HMA authorities in the SHMA. However, there is considered to be clear suppression in the 25-34 and 35-44 age groups in the 2012 and 2014-based CLG

household formation rates when compared to the 2008-based rates. An adjustment in line with recommendations of the Local Plans Expert Group (LPEG); a 50% return to 2008-based household formation rates by 2033, is therefore applied as a sensitivity test by Barton Willmore.

- 4.5 In line with the approach of the Black Country and South Staffordshire SHMA, Barton Willmore has also considered two scenarios of 10-year migration, for the periods of 2005-2015 and 2006-2016. This provides alternative demographic-led scenarios in line with PPG.
- 4.6 Barton Willmore's sensitivity testing shows a requirement for between 3,690 and 3,870 dwellings per annum based on unadjusted 2014-based household formation rates. Importantly the higher end of this range is based on the most recent 10-year migration trend period (2006-16). Barton Willmore consider the latest 10-year trend should be used as the demographic-led OAHN.
- 4.7 However applying an adjustment for household formation suppression in the 25-34 and 35-44 age groups shows a minimum 8% increase to the unadjusted household formation rate scenarios. This would lead to need of 3,990 dwellings per annum (2014-based ONS SNPP), increasing to 4,010 dwellings per annum (2005-2015 period used in the BCSHMA), and 4,180 dwellings per annum (latest 10-year migration period of 2006-2016);
- 4.8 **Overall, the Housing Need Technical Review identifies that the steps required to arrive at demographic-led OAHN shows a need for 4,180 dwellings per annum (2014-2036). This increases to 4,300 dwellings per annum when taking into account the housing shortfall identified by Black Country and South Staffordshire SHMA between 2011 and 2014 (2,689 dwellings).**

Economic OAHN

- 4.9 The Housing Need Technical Review identifies that the policy off forecasts provided (Experian and Oxford Economics) in the Black Country and South Staffordshire SHMA should be updated to reflect the latest forecasts available. It is also recommended that the Cambridge Econometrics latest job growth forecast are taken into account alongside the Experian and Oxford Economics. Furthermore, it is considered that a more detailed analysis of past trends job growth is required to ensure a robust analysis can be undertaken and that the Black Country and South Staffordshire SHMA does not provide sufficient detail.
- 4.10 The Black Country and South Staffordshire SHMA states that alternative economic activity rates to those incorporated in the Experian economic model cannot be used when determining OAHN is considered to be incorrect. Instead, it is considered entirely reasonable to apply independent economic activity rate assumptions (as done by Barton Willmore) to determine the number of

people required to fill jobs, as determined by Local Plan Inspectors and used by local authorities and other planning consultants when determining OAHN.

- 4.11 Barton Willmore's preferred demographic-led OAHN sensitivity scenario (2006-16 migration trend) shows that growth of 4,180 new homes per annum across the Black Country HMA will support 3,380 jobs per annum (2014-2036). Based on the September 2016 Experian forecast included in the Black Country and South Staffordshire SHMA (2,250 new jobs per annum, 2014-2036) the demographic-led OAHN will support policy off job forecasts. It is recommended that updated forecasts are obtained to ensure that this remains the case.
- 4.12 The West Midlands Combined Authority (WMCA) Strategic Economic Plan (SEP) suggests that housing growth similar to the 2014-based ONS SNPP (the starting point estimate) will support their policy on job forecast for the Black Country LEP (Dudley, Sandwell, Walsall and Wolverhampton). Our analysis suggests that a significantly higher housing number would be required if the WMCA SEP job growth figure were to be met through policy off demographic forecasting. Therefore further detail regarding the WMCA evidence base is required to fully review and critique this element.

Market Signals

- 4.13 Whilst the PPG makes it clear as to which market signals should be analysed, it fails to provide clarity on what level of uplift would be required to provide an adequate response. In the absence of any specific guidance, Barton Willmore have considered a number of alternative approaches to arriving at market signals OAHN for the Black Country HMA. These approaches have included the Local Plans Expert Group's (LPEG), Redfern Review, Barker Review, the NHPAU and the Housing White Paper. These recommendations would require an OAHN range for the BCHMA of between 3,620 and 5,310 dwellings per annum (2014-2036) in response to market signals. This equates to an increase from 2% lower and 44% higher than the starting point estimate of OAHN for the Black Country HMA (3,690 dwellings per annum).
- 4.14 In the above context, it is considered that the demographic-led OAHN that Barton Willmore has identified through sensitivity testing (4,180 dwellings per annum) would help to address market signals pressure across the Black Country HMA, by providing a 13% uplift to the starting point estimate of OAHN.

Summary

- 4.15 In summary, the Black Country and South Staffordshire SHMA shows a range of 3,691-3,824 dwellings per hectare for the Black Country HMA (excluding/including the shortfall of 2,689 dwellings, 2011-2014). However, **Barton Willmore's sensitivity testing shows an OAHN of 4,180-4,300 dwellings per hectare is required for period of 2014-2036.**

5.0 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?

- 5.1 Yes. Gallagher Estates agree with the proposed approach to the Black County Green Belt Review. Gallagher Estates welcome and support that the Green Belt Review will be carried out in conjunction with South Staffordshire, particularly given the strong housing market links that the Black Country and South Staffordshire share.
- 5.2 In the context of Paragraph 83 of the NPPF, Gallagher Estates consider that the significant need to deliver housing land within the Black Country and wider HMA, which also includes Birmingham City and its unmet housing need, creates 'exceptional circumstances' in order for land in the Green Belt to be released. This is further supported by the findings of the Greater Birmingham LEP and Black Country Local Authorities Strategic Housing Needs Study (SHNS) (Stage 3) (August 2015) which assesses the future housing needs across the sub-regional housing market area (including South Staffordshire); land supply currently identified; and if, supply falls short of need, explores spatial options for meeting the shortfall. The SHNS Stage 3 Report (August 2015) identifies that the HMA, as a whole, has a shortfall of 37,573 new dwellings over the period of 2011 to 2031, the majority existing from Birmingham City Council. In terms of Green Belt, the SHNS Stage 3 Report (August 2015) identifies that there is a supply of land which is free of absolute constraints when viewed under a 'Green Belt off' scenario. If it were developed, this supply could address the strategic housing shortfall either close to where housing need arises or in easily accessible places. The 'Green Belt on' scenario shows that almost all of the potential additional land within the HMA is undeliverable, regardless of how well connected it is. The SHNS Stage 3 Report (August 2015) concludes that if the Green Belt is maintained in its current form, it is very unlikely that the Greater Birmingham HMA will be able to accommodate the strategic housing shortfall that has been identified.
- 5.3 With particular regard to the Site, the SHNS Stage 3 Report (August 2015) assessed the development capacity of Green Belt land surrounding train stations, with a radius of 1.2 kilometres. It was found that the proximity of rail stations could help guide the potential selection of new urban extensions where there is land in close proximity to rail stations and part of the conurbation or other large towns. The study's analysis of individual stations identified that it was not uncommon to find rail stations very close to the urban boundary where the Green Belt commences – i.e. stations where less than 50% of the radius area is not currently urban. The study states:

“For example Longbridge and Blake Street are on the very edge of the urban area but the land is protected from development only by a Green Belt constraint (at the moment). In the Black Country and South Staffordshire, Bloxwich North and Landywood are in a similar position”.

5.4 It is therefore considered that the Green Belt currently acts as a fundamental constraint to the ability to deliver sufficient housing in the Black Country and the wider HMA. As identified in the SHNS Stage 3 Report (August 2015), under a ‘Green Belt off’ scenario there is a supply of land close to where housing need arises or in easily accessible locations. It is therefore considered that the Green Belt currently precludes the formation of a more sustainable pattern of development.

5.5 It is therefore important that Green Belt does not ‘trump’ sustainable development, which is not the intention of the NPPF. Indeed, the Inspector to the Lichfield Local Plan recognised this point. He acknowledged that Green Belt release should only take place in exceptional circumstances, in line with Paragraph 83 of the NPPF, but at Paragraph 200 of his report dated 16th January 2015 (**Appendix 4**) stated that Green Belt release is not a ‘last resort’ as:

“this would be to accept that sustainability is servant of Green Belt designation – which is not... the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development”.

5.6 This is in line with Paragraph 84 of the NPPF which highlights that when drawing up or reviewing Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development. Clearly, one of the benefits of development on the Green Belt is the ability to deliver much needed housing land in the Black Country in sustainable locations.

5.7 Overall, it is clear that:

- a. Green Belt land will need to be released to ensure that sufficient housing can be delivered;
- b. For the undertaking of the Green Belt Review it is essential that large sites suitable for sustainable urban extensions in the Green Belt, particularly those close to existing railway stations, are assessed; and
- c. The Green Belt Review should be informed by the findings of the Call for Sites Exercises (July-September 2017).

6.0 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?

- 6.1 No. Whilst Gallagher Estates broadly agree with the key issues set out in Part 3 in the Issues and Options Consultation Document, it is also considered that the key issues should place further emphasis upon the need to deliver sufficient housing for the Black Country and the wider HMA, as well as to meet some of Birmingham's housing shortfall.
- 6.2 One of the key issues is that the current evidence base is out of date and does not provide a sound basis to underpin the Black Country Core Strategy Review. Accordingly, Gallagher Estates support a review and update of the evidence base. As stated in our response to Question 2, Gallagher Estates agree that the evidence base documents set out in Table 1 of the Issues and Options Consultation Document will be sufficient to support the key stages of the Review.
- 6.3 The Issues and Options Consultation Document at Paragraph 3.61 notes that another key issue is the growing population and that 'there is a gap between the need and anticipated supply of around 22,000 homes and there is a need to look beyond the existing Growth Network to meet it'. This key issue is supported and it is also agreed that a large number of homes and supporting services will need to be accommodated outside the existing urban area of the Black Country which is currently designated as Green Belt.
- 6.4 Accordingly another key issue is the Green Belt, and the Issues and Options Consultation Document acknowledges that there has not been a strategic Green Belt Review in the Black Country since the 1970s and that it is inevitable that Green Belt land will be needed to accommodate the long-term development needs. As stated in our response to Question 5, we support the undertaking of Black Country Green Belt Review as 'exceptional circumstances' exist for the release of Green Belt land in order to ensure sufficient housing land is delivered.
- 6.5 Infrastructure is considered as another key issue for the Core Strategy Review, and there is a need to review the capacity of existing infrastructure against its ability to support the additional anticipated growth.

7.0 QUESTION 7

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

7.1 No. Whilst Gallagher Estates recognise that the Visions is based upon the three dimensions to sustainable development as set out at Paragraph 7 of the NPPF and broadly support the majority of specific sustainability principles, Gallagher Estates do not support the fourth principle 'putting brownfield first'. The specific sustainability principles include:

1. Facing up to climate change;
2. Sustainable development;
3. Social inclusion;
4. Putting brownfield first; and
5. A comprehensive approach to development.

7.2 With regard to the fourth sustainability principle, putting brownfield first, we acknowledge that the effective use of brownfield land should be encouraged in line with Paragraphs 17 and 111 of the NPPF. However, it is important to note that the NPPF does not state that brownfield land should be put first. It is also clear that the Government and the West Midlands Combined Authority (WMCA) are prioritising development on brownfield land. However, the SHNS Stage 3 Report (August 2015) recognises that the Black Country has a good supply of brownfield land, but states:

"...the supply of brownfield land is finite and we cannot keep creating more. There will come, at some point in the future, a tipping point where we cannot keep relying on this supply to provide the same share of our housing needs. Quantitatively, this is because brownfield land cannot provide sufficient numbers of new homes. Qualitatively, brownfield land cannot necessarily be relied on to meet the full range of property which is in demand. In particular, it is not clear that brownfield development can continue to meet demand for lower-density family housing. In this area, the tipping point has already been reached for individual local authorities aiming to meet their own needs, even before they try identify further land for the strategic shortfall".

- 7.3 Therefore, it must also be recognised that greenfield and Green Belt release sites will need to be relied upon to deliver sufficient housing land for the Black Country, as well as meeting Birmingham's shortfall.
- 7.4 In turning to the delivery side of brownfield sites, we consider that brownfield land is notoriously slow to deliver. It is also considered that generally the most viable brownfield sites have already been developed. For those sites which have not been redeveloped but may benefit from a policy allocation or planning permissions, there are usually barriers to redevelopment which can include, but are not limited to multiple ownership, site size, relocation of existing users, contaminated land, highways access, issues over local amenity /neighbouring uses, and a lack of infrastructure. Each one of these issues can take years to resolve and many of the solutions will not be viable without major public sector investment/intervention and use of powers such as compulsory purchase. Given the plethora of issues associated with delivering growth on brownfield land, we are sceptical about the scale of dependence and the rates at which it has the potential to deliver. Therefore, whilst it should be encouraged, it is considered that the delivery of key greenfield sites and Green Belt release sites should not be put on hold until after brownfield sites are developed.
- 7.5 Accordingly, it is considered that a combined response to the delivery of housing is required which includes the delivery of brownfield, greenfield and Green Belt release sites to meet the significant housing need. Therefore a proposed change is sought for the fourth sustainability principle, which is as follows: **"the delivery of sustainable brownfield, greenfield and Green Belt release sites to meet housing need"**.

8.0 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?

- 8.1 No. Whilst Gallagher Estates broadly agree that these remain appropriate, Gallagher Estates do not agree with Spatial Objective 3 which currently states:

“Model sustainable communities on redundant employment land in the Regeneration Corridors”.

- 8.2 It is considered that Objective 3 is out of date and needs to be amended to reflect the significant need to deliver sufficient land to accommodate the housing needs of the Black Country as well as Birmingham’s unmet housing need. As highlighted in Key Issue 6 of the Issues and Options Consultation Document, the significant housing need within the Black Country and the wider HMA will require the identification of new sites on land outside the urban area, of which the majority are currently located within the Green Belt. Furthermore, as stated in our response to Question 7, the supply of brownfield land is finite and cannot be relied upon to the extent currently assumed to meet the identified housing need. It therefore needs to be recognised that sustainable communities cannot just be provided on employment land within the Regeneration Corridors and that greenfield sites will also need to be development to support sustainable communities.

- 8.3 It is therefore requested that Strategic Objective 3 is revised to acknowledge that sustainable communities will also need to be provided on sustainable Green Belt release sites, in accordance with the amended spatial strategy. As we have set out in our response below to Question 13a, Gallagher Estates are supportive of Spatial Housing Option 2 which seeks to release land from the Green Belt to be allocated for a number of Sustainable Urban Extensions (SUEs) across the Black Country (including cross boundary options), in the most sustainable locations which are already or have the potential to be well served by infrastructure. Accordingly, the following proposed change is sought to Spatial Objective 3: **“Deliver sustainable communities in a range of sustainable locations within or close to the existing urban area, including: brownfield land; greenfield land and Green Belt release sites”.**

9.0 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?

9.1 Yes. Gallagher Estates support Strategic Option 1A which seeks to continue and strengthen the Growth Network with some corridors being housing led and others employment led, and with the remaining housing and employment land growth to be accommodated in the Green Belt. Gallagher Estates do not support Strategic Option 1B which seeks to restructure the existing Growth Network, with more occupied employment land being redevelopment for housing in the Regeneration Corridors and the remaining housing and employment land growth, and replacement employment land, to be accommodated in the Green Belt.

9.2 As set out in the Issues and Options Consultation Document, there are many opportunities provided by Strategic Option 1A. Indeed, this is recognised at Paragraph 84 of the NPPF which promotes sustainable patterns of development when defining Green Belt boundaries and states:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”.

9.3 Therefore, it is considered that Strategic Option 1A will provide for sustainable patterns of development in line with Paragraph 84 of the NPPF; by providing new homes close to the urban edge and to where need arises within the Black Country.

9.4 Strategic Options 1A should boost the supply of housing and employment land. The need for housing is emphasised by the NPPF and Paragraph 17 encourages and supports sustainable economic development to deliver the homes that the country needs. A key objective of the NPPF is to deliver a wide choice of high quality homes. Paragraph 47 states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively-assessed needs for the market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. This includes identifying key sites that are critical to the delivery of sufficient

housing over the plan period. Accordingly, Gallagher Estates support Spatial Option 1A as it will significantly boost the supply of housing in sustainable locations.

- 9.5 Another opportunity of Strategic Opportunity 1A is that it will reduce the need to promote the redevelopment of existing employment sites for housing, particularly as the Black Country Economic Development Needs Assessment (EDNA) May 2017 has identified that there will be a requirement to provide for 800 hectares (approximately 40 hectares per annum) of employment land for development for industrial uses up to 2036. Furthermore, it will also reduce the need to relocate existing businesses to other employment sites in the Black Country which could cause disruption to economic growth.
- 9.6 Finally, Strategic Option 1A does not rely upon occupied existing employment land being redeveloped for housing which presents many challenges. Redeveloping employment land for housing can be difficult in terms of delivery and viability, which includes ground conditions of such sites. Furthermore, existing employment land may not be in the right location where future residents would wish to live or a location that benefits from the right supporting social and physical infrastructure.

10.0 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.

- 10.1 No. Spatial Option H1 seeks to 'round off' the edge of the Green Belt, including internal Green Belt wedges, to release a large number of small to medium sized sites for housing. Gallagher Estates consider that Spatial Option H1 cannot be relied upon alone to deliver sufficient housing in sustainable locations that is required in the Black Country and to meet the needs of the wider HMA. This view is supported by the Issues and Options Consultation Document, which identifies that Spatial Option H1 would not meet all of the required housing need. Therefore, to ensure that sufficient housing is delivered to meet the needs of the Black Country and the wider HMA, it is considered that the development of Sustainable Urban Extensions (SUEs) outside of the urban area are also required.
- 10.2 Another challenge of Spatial Option H1 is that smaller sites may not trigger requirements for new infrastructure and services, but at the same time they could place cumulative pressure and strain on existing infrastructure. Therefore given the significant housing requirement for the Black Country, it is clear that infrastructure will need to be improved and further services and facilities needed to support the increased housing requirement. As stated above, it is considered that SUEs would help meet the housing need in sustainable locations in the Black Country, and they will also provide the opportunity to provide a range of infrastructure and local services that future and existing residents would benefit from.
- 10.3 Overall, it is considered that the allocation of SUEs is needed in order to accommodate significant housing growth outside of the urban area.

11.0 QUESTION 13A

Do you support Spatial Option H2? Yes/No; What should be the characteristics of Sustainable Urban Extensions (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?

- 11.1 Yes. Gallagher Estates support Spatial Option H2, a more focussed approach, which seeks to release land from the Green Belt to allocate a limited number of SUEs across the Black Country (including cross boundary options) in the most sustainable locations which are already or have the potential to be well served by infrastructure.
- 11.2 The need for housing is emphasised by the NPPF and Paragraph 17 encourages and supports sustainable economic development to deliver the homes that the country needs. A key objective of the NPPF is to deliver a wide choice of high quality homes. Paragraph 47 states that to boost significantly the supply of housing, local planning authorities should identify key sites that are critical to the delivery of the housing strategy over the plan period. Furthermore, Paragraph 52 confirms that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. It is considered that the allocation of large sites to be released from the Green Belt for SUEs will significantly boost the supply of housing. Gallagher Estates therefore support the allocation of SUEs to meet the significant housing needs of the Black Country and the wider HMA.
- 11.3 Furthermore, the allocation of large sites for release from the Green Belt, as SUEs will enable new housing to take place in locations close the existing urban edge of the Black Country where the need arises. This will accord with the approach advocated at Paragraph 84 of the NPPF; which advises local planning authorities to take account of the need to promote sustainable patterns of the development when reviewing Green Belt boundaries.
- 11.4 In addition, as stated in our response to Question 12a, SUEs will provide the opportunity for necessary infrastructure, and services and facilities to serve future and existing residents of the local area.
- 11.5 With regard to characteristics of SUEs, and in particular the minimum/maximum size, we consider that the definition set out in the SHNS Stage 3 Report (August 2015) is appropriate which defines a SUE as development on the edge of a settlement which can accommodate between 500-5,000 homes and is of a scale that is appropriate to the scale of the settlement being extended. With regard to a mix of uses, it is considered that SUEs should provide a local

centre with retail and community uses, a school(s), services, facilities and open space which benefits the future residents as well as residents of the surrounding area. Finally with regard to a mix of housing types, it is considered that SUEs should provide a wide range of market and affordable housing.

11.6 In terms of the criteria that should be used to select suitable large sites for SUEs, it is suggested that these should include the following:

- Sustainability, availability and deliverability;
- Proximity to a rail station;
- Ease of access to existing infrastructure (including a railway station);
- Potential to provide new infrastructure;
- Potential to provide a local centre, services and community facilities;
- Potential to provide open space (including sports provision and children's play areas);
- Proximity to existing urban area of the Black Country; and
- Suitability of the land to be released from the Green Belt.

Land at Yieldfields Farm, Bloxwich

11.7 In light of the above, our Client's site at Yieldfields Farm in Bloxwich is exactly the type of a large site that could be released from the Green Belt to deliver a SUE on the edge of urban area at Bloxwich. This would be in accordance with the aims of the NPPF, and would also significantly assist in meeting the housing need of the Black Country and the wider HMA. The Site is available and covers approximately 122 hectares of land, comprising a series of parcels of land between Landywood and Bloxwich, with the Stafford Road (A34) running through the middle (as shown in **Appendix 1**). The Site comprises land currently within the Green Belt. The northern section of the Site is located within the administrative boundary of South Staffordshire District Council, and the southern section is located within Walsall Borough Council's administrative boundary.

11.8 The Site benefits from a sustainable location with good access to surrounding sustainable modes of transport. Bloxwich North Rail Station is located approximately 1 kilometre to the west, which provides services between Birmingham New Street and Rugeley Trent Valley. There are also three bus stops near the Site, the closest being located 135m away on Turnberry Road and the second and third stops along the Stafford Road (A34). All of the bus stops are used for the same service which runs every 10-20 minutes during peak time and links the area to

Walsall, Birmingham and Cannock. With regard to the local road network, the Site is located along the Stafford Road (A34) and an initial Transport Appraisal has been undertaken which identifies that the surrounding road network has the capacity to serve the proposed SUE.

- 11.9 With regard to the Site's location near Bloxwich North Railway Station, the SHNS Stage 3 Report (August 2015) assessed the development capacity of land surrounding train stations, with a radius of 1.2 kilometres. The study found that the proximity of rail stations could help guide the potential selection of new urban extensions where there is land in close proximity to rail stations and part of the conurbation or other large town. The study's analysis of individual stations identified that it was not uncommon to find rail stations very close to the urban boundary where the Green Belt commences – i.e. stations where less than 50% of the radius area is not currently urban. The study states:

“For example Longbridge and Blake Street are on the very edge of the urban area but the land is protected from development only by a Green Belt constraint (at the moment). In the Black Country and South Staffordshire, Bloxwich North and Landywood are in a similar position”.

- 11.10 As such it is considered that Site has a sustainable location where there is capacity to deliver a significant amount of housing to meet the identified need.
- 11.11 A Development Framework Document (**Appendix 2**) has been submitted as part of the Site's Call for Sites submission, and includes two proposed masterplans for consideration. The first masterplan covers approximately 46 hectares of land within Walsall's administrative boundary and, on the basis that around 26 hectares is used for housing, the Site could deliver up to approximately 800 new homes. This masterplan also includes a local centre (including retail and community uses), a primary school and open space/sports provision.
- 11.12 The second masterplan covers the whole site (122 hectares) and, assuming 68 hectares of land is used for housing, could deliver up to a total of approximately 2,000 new homes as well as reserving land for a future rail station which would replace North Bloxwich, which is very constrained with limited parking facilities. This masterplan also includes two local centres (including retail and community uses), two primary schools and a significant amount of informal/formal open space which includes sports pitch provision and children's play areas. Both of the proposed masterplans would deliver new green infrastructure together with ecological improvements and benefits.
- 11.13 A Landscape, Visual and Green Belt Appraisal (September 2017) (**Appendix 5**) has been prepared by Barton Willmore which considers the Site's suitability to be developed for housing, including its removal from the Green Belt, and provides landscape and visual advice to assist

in integrating such development into the surrounding landscape. The Landscape, Visual and Green Belt Appraisal identifies that the Site has potential in landscape and visual terms to accommodate large scale residential development, subject to the incorporation of a sensitive response to the identified landscape and visual opportunities and constraints to provide a robust boundary to the Green Belt. Furthermore, it was found that the Site is generally well-contained in views from the surrounding area owing to intervening landform, built form and the extensive vegetation network.

- 11.14 The Landscape, Visual and Green Belt Appraisal has also assessed the Site's contribution to the purposes of the Green Belt. The Site is considered to make limited-some contribution to the purposes of the Green Belt. It is also considered that the ridgeline forming the northern edge of the Site provides the basis, through reinforcement with structural planting, of *"physical features that are readily recognisable and likely to be permanent"*, as stated in Paragraph 85 of the NPPF as requisite for Green Belt boundaries.
- 11.15 Overall, it is clear that the Site provides a sustainable opportunity to significantly increase the supply of new housing together with the associated community infrastructure. The masterplan for the whole site also reserves land for the delivery of a new railway station to replace Bloxwich North Station. Finally the development of the Site could be phased, with the southern parcel within Walsall Borough delivering homes first, i.e. starting within the next five years.

12.0 QUESTION 13C

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).

- 12.1 Yes. Gallagher Estates have submitted land at Yieldfields Farm on the edge of Bloxwich as part of the Call for Sites exercise which runs alongside this Issues and Options consultation.
- 12.2 As outlined in our response, the Site comprises approximately 122 hectares of land that lies over the two administrative authorities of South Staffordshire and Walsall. The Site is currently located within the Green Belt and provides the opportunity to deliver a total of approximately 2,000 new homes alongside local community facilities and infrastructure. Further details of the Site are provided in the submitted Development Framework Document (**Appendix 2**).

13.0 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?

- 13.1 No. Gallagher Estates consider that detailed guidance for the development of SUEs should be determined by the individual local planning authorities which take account of the local circumstances and requirements for that District or Borough.
- 13.2 Paragraph 50 of the NPPF states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create a sustainable, inclusive and mixed communities, local planning authorities should:
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
 - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
- 13.3 As such it is considered that the detailed guidance for the development of SUEs should be determined by Local Authorities in order to assess the particular locations of sites and to reflect local demand.
- 13.4 As stated in our response to Question 13a, Gallagher Estates' site is located across the two administrative boundaries of South Staffordshire District and Walsall Borough Council. Paragraph 179 specifically relates to planning strategically across local boundaries and states that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated. Therefore in these circumstances, where large scale SUEs are cross boundary sites, it is suggested that local planning authorities work collaboratively to provide specific site related advice in relation to the specific type and tenure of housing and infrastructure that is required for the SUE.

14.0 QUESTION 15A

If all housing need cannot be met within the Black County, 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?

- 14.1 Gallagher Estates consider that the BCCS should endeavour to meet their full objectively assessed housing need for market and affordable housing before any unmet housing need is exported to neighbouring authorities.
- 14.2 As stated in our response to Question 3, Gallagher Estates are supportive of the cross-boundary working between the Black Country Authorities and South Staffordshire District Council. The housing needs of the Black Country and South Staffordshire have jointly been assessed as part of the evidence for the Review. The SHNS Stage 3 Report (August 2015) identifies South Staffordshire as having capacity to help meet the HMA's housing shortfall. It is therefore considered that South Staffordshire District Council should also endeavour to meet their full objectively assessed housing need alongside the Black Country before any unmet housing need is exported to the rest of the HMA. Accordingly, the Black Country and South Staffordshire should assess all of their opportunities to deliver sustainable housing sites which are close to sustainable modes of transport, including railway stations, and have good access to the existing road network.
- 14.3 Gallagher Estates are concerned that if housing growth is exported on a large scale to local authorities such as Telford and Stafford, that these locations would not help meet the housing requirement of the Black Country as well as Birmingham's unmet need. Therefore it is considered that the Black Country Local Authorities should endeavour to meet their full OAHN.

15.0 QUESTION 15B

Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details?

- 15.1 Yes. Gallagher Estates' site at Yieldfields Farm represents a sustainable and logical extension to Bloxwich and has the capacity to deliver 2,000 homes. The Site has been submitted as part of the Call for Sites exercise which runs alongside this Issues and Options Consultation. The Site covers approximately 122 hectares of land that currently falls within the Green Belt. The Site has good accessibility to a range of sustainable modes of transport, including Bloxwich North Railway Station, as well as the surrounding road network.
- 15.2 As set out above and in the Development Framework Document (**Appendix 2**) two masterplans have been prepared showing how the Site could be phased. The first masterplan covers 46 hectares of land that lies within Walsall Borough's administrative boundary, and on the basis that around 26 hectares of land is developed for housing, it has the potential to deliver approximately 800 new homes. This masterplan also presents the opportunity to deliver a local centre, a primary school and a significant amount of open space, including sports pitch provision.
- 15.3 The second masterplan covers the whole site, and assuming around 68 hectares of land is developed for housing, it has the potential to deliver a total of approximately 2,000 new homes. This masterplan also provides the opportunity to deliver two local centres, two primary schools and significant amount of open space, as well as reserving land for a future railway station to replace North Bloxwich Railway Station.
- 15.4 As set out in the Development Framework Document (**Appendix 2**) the development for approximately 2,000 new homes could be phased with the southern parcel, lying within Walsall Borough's administrative boundary, delivering homes first (i.e. starting in the next five years).

16.0 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.

16.1 Yes. Gallagher Estates support adopted Core Strategy Policy DEL1 which states that:

“All new developments should be supported by the necessary on and off-site infrastructure to serve the development, mitigate its impacts on the environment, and ensure that the development is sustainable and contributes to the proper planning of the wider area. Unless material circumstances or considerations indicate otherwise, development proposals will only be permitted if all necessary infrastructure improvements, mitigation measures and sustainable design requirements and proposals are provided. These will be secured through planning obligations, the Community Infrastructure Levy, planning conditions or other relevant means or mechanisms, to an appropriate timetable that is prioritised, resourced, managed, delivered and co-ordinated across the sub region as a whole where appropriate”.

16.2 Whilst the allocation of Green Belt release sites for SUEs may require additional infrastructure and community services and facilities, it is considered that these contributions can continue to be provided through Section 106 Agreements and the Community Infrastructure Levy. Accordingly, it is considered that adopted Policy DEL1 should be updated to be more explicit to ensure that ‘all new developments’ cover Green Belt release sites as well as sites located within the existing urban area.

17.0 QUESTION 35

Do you support the proposed approach to housing land supply?

Yes/No; If no, please explain why.

- 17.1 No. Gallagher Estates do not support possible phasing of brownfield sites. It is recognised that the development of brownfield land needs to be encouraged in line with Paragraphs 17 and 111 of the NPPF. However, as stated in our response to Question 7, the findings of the SHNS Stage 3 Report (August 2015) identify that brownfield land cannot be relied upon alone to meet the identified housing need. Furthermore, it is considered that brownfield sites are notoriously slow to deliver and that most viable sites have already been delivered. Therefore, Policy HOU1 must recognise that greenfield and Green Belt release sites will need to be relied upon in order to help meet the housing needs of the Black Country and the wider HMA. Accordingly, it is considered that to ensure strong and effective delivery of housing, phased allocations should incorporate a balance between the delivery of brownfield and greenfield and Green Belt release sites rather than brownfield sites being allocated or expected to come forward first, before greenfield and Green Belt release sites. This approach will also help deliver sustainable patterns of development and the delivery of new infrastructure.

18.0 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?

- 18.1 No. Adopted Core Strategy Policy HOU2 states that the density and type of new housing providing on each site will be informed by the need to achieve high quality design and minimise amenity impacts, taking into account the characteristics and mix of uses in the area where the proposal is located. Policy HOU2 also states that all developments will aim to achieve a minimum net density of 35 dwellings per hectare, except where higher densities would prejudice historic character and local distinctiveness as defined in Policy ENV2.
- 18.2 As set out in the Development Framework Document (**Appendix 2**), the Site at Yieldfields Farm could deliver up to approximately 2,000 new homes based upon 30 dwellings per hectare. The Landscape Opportunities and Constraints Plan, set out in the Development Framework Document, identifies that some areas of the Site have a medium landscape and visual constraint and are therefore suitable for lower density built development. The Landscape Opportunities and Constraints Plan also identifies that other areas have a low landscape and visual constraint and are therefore suitable for medium density built environment. It is considered that the areas shown appropriate for medium density could potentially achieve 35 dwellings per hectare, subject to a more detailed urban design approach. Therefore, given the Site's landscape and Green Belt removal considerations that need to be taken into account, there would need to be a balanced and sensible approach to determining the density that is delivered on the Site.
- 18.3 In light of the above, it considered that the current standard for 35 dwellings per hectare could be difficult to apply to Green Belt release sites due to the surrounding landscape setting and characteristics. It is therefore suggested that minimum densities of 30 dwellings per hectare should be sought for Green Belt release sites. Higher densities could be delivered where it is sensible and reasonable to do so, but this must take into account the landscape and visual opportunities and constraints related to the site.

19.0 QUESTION 41A

Do you support the introduction of a policy approach towards self and custom house building in the Core Strategy?

19.1 The Issues and Options Consultation Document identifies that Local Authorities are now required to identify the level of demand for self and custom house building in their area by setting up a register, and to take account of demand when preparing a Local Plan. With regard to increasing the number of planning permissions which are suitable for self-build and custom housebuilding, the PPG states:

“Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include:

- **Developing policies in their Local Plan for self-build and custom housebuilding;**
- **Using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;**
- **Engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and**
- **Working with custom build developers to maximise opportunities for self-build and custom housebuilding”.**

(Paragraph: 025 Reference ID: 57-025-201760728)

19.2 Gallagher Estates acknowledge that the Black Country Local Authorities have a requirement to deliver a wide range of accommodation, including self-build and custom housebuilding. However, Gallagher Estates do not support a specific policy being introduced into the Core Strategy that requires larger housing sites to provide a proportion of serviced plots self-build and custom housebuilding. Instead, it is suggested that the Black Country Local Authorities seek to: deliver self-build and custom housebuilding through small-scale allocations; use their own land where possible for self-building and custom housebuilding; and work with custom build developers to maximise opportunities for self-build and custom housebuilding.

20.0 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?

- 20.1 No. The Issues and Options Consultation Document identifies that one of the options to increase affordable housing delivery would be to introduce an increased affordable housing requirement for Green Belt release sites, where such an increase is suggested to be more financially viable. However, Gallagher Estates do not agree that an increased affordable housing requirement should be set for Green Belt release sites.
- 20.2 Green Belt release sites are likely to be subject to increased costs, such as those related to the provision of infrastructure and local services and facilities. As such, the viability of residential developments is an important factor that should be taken into account when determining the level of affordable housing provision to be provided. This matter is strongly supported at Paragraph 173 of the NPPF, which states:

“To ensure viability, the costs of any requirements likely to be applied to development such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable development to be deliverable”.

- 20.3 In the context of Paragraph 173, we consider that an increased requirement for affordable housing on Green Belt release sites should not be sought. An increased affordable housing requirement could affect the viability of some Green Belt release sites, therefore jeopardising the delivery of housing in the Black Country and the wider HMA.

21.0 QUESTION 89

Do you support the proposed changes to the priorities for the development of the transport network? Yes/No; Please explain why.

- 21.1 Yes. Gallagher Estates broadly support the proposed changes to the priorities for the development of the transport network. In particular, Gallagher Estates support the priority which seeks to improve existing railway stations and provide new railway stations to meet demand. As stated in our response to 13a, Gallagher Estates' site at Yieldfields Farm lies approximately 1 kilometre to the east of Bloxwich North Railway Station; which is currently very constrained with limited facilities. The development of the Site for a large urban extension to Bloxwich would reserve land for a new railway station to replace North Bloxwich Railway Station and details of this are set out in second masterplan of the submitted Development Framework Document (**Appendix 2**). The development of approximately 2,000 new homes at the Site would help create demand for an improved railway station. Accordingly, Gallagher Estates also support the priority to improve rail passenger services across the Black Country.
- 21.2 The Site is also located close to three bus stops along the Stafford Road (A34) which provide connections to Walsall, Birmingham and Cannock. These services run every 10-20 minutes during the peak hour times and it is considered that there is potential to improve this service, possibly by re-directing it through the development. As such, Gallagher Estates are support the priority to deliver a quality bus network across the Black Country.

22.0 QUESTION 95A

Do you think Garden City principles should be applied in the Black Country? Yes/No; If yes, how should they be applied?

- 22.1 Yes. Gallagher Estates broadly support the application of Garden City principles in the Black Country and support their inclusion with the Black Country Core Strategy. Paragraph 52 of the NPPF identifies that the supply of new homes can sometimes be best achieved through planning for large scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.
- 22.2 The Town and Country Planning Association (TCPA) identifies that a Garden City is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. The TCPA further advises that Garden City principles are an indivisible and interlocking framework for their delivery, and include:
- Strong vision, leadership and community engagement;
 - Community ownership of land and long-term stewardship of assets;
 - Mixed-tenure homes and housing types that are genuinely affordable;
 - A wide range of local jobs in the Garden City within easy commuting distance of homes;
 - Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food;
 - Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience;
 - Strong cultural, recreational and shopping facilities in walkable, vibrant, social neighbourhoods; and
 - Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.
- 22.3 It is considered that the Black Country Core Strategy should encourage the principles listed above to be delivered as part of new large scale developments in the Black Country. In particular, the Black Country Core Strategy should encourage developments that provide a mix of homes with a high quality design, biodiversity and ecological enhancements, green

infrastructure and sustainable modes of transport. It is considered that these principles should be incorporated into the existing Core Strategy policies that they relate to.