

Black Country Core Strategy
Issues and Options Report
Representations on behalf of the Feoffees
of Old Swinford Hospital

September 2017

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1. Introduction

- 1.1 These representations are made on behalf of the Feoffees of Old Swinford Hospital (hereafter referred to as 'OSH'), who are promoting land at Racecourse Lane, Stourbridge ('the site').
- 1.2 The Feoffees of Old Swinford Hospital are the trustees of a charitable foundation which supports a boys school also known as Old Swinford Hospital, situated in the centre of Stourbridge. The School was founded by Thomas Foley in 1667 as a place where boys could develop the skills and attributes required to go out into the wider world and make a difference. Upon Thomas Foley's death, the school was left to a group of trustees, his sons among them, known as Feoffees. This family tradition has survived the centuries and the Feoffees, including several direct descendants of the founder, retain an active involvement in the School of the Foundation today as trustees and governors.
- 1.3 The Foundation owns a site at Racecourse Lane, Stourbridge, located within the administrative area of Dudley Metropolitan Borough Council (MBC). Dudley MBC forms one of the four authorities (along with Sandwell, Walsall and Wolverhampton) whom make up the Black Country Core Strategy ('BCCS') Plan area. The BCCS was adopted in February 2011 and covered the period 2006 to 2026. The BCCS is now being reviewed to ensure its spatial objectives and strategy are being effectively delivered, and it remains up to date. Coupled with this are the Black Country's ambitions for significant residential growth.
- 1.4 OSH welcome the opportunity to provide comments on the BCCS Review Issues and Options Report (the 'I&O Report'). These representations are supported by the following:
 - Site Location Plan (**Appendix 1**)
 - Call for Sites Form (**Appendix 2**)
 - Racecourse Lane Masterplan (**Appendix 3**)

2. Response to Questions

Q1. Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? If not, what do you think should be the scope of the review?

- 2.1 Paragraph 151 of the National Planning Policy Framework ('NPPF') establishes that Local Plans should be consistent with the principles and policies set out in the NPPF. The adopted BCCS was published in 2011, prior to the publication of the NPPF in March 2012. It is based on the housing needs identified by the now revoked West Midlands Regional Spatial Strategy ('WMRSS') and the subsequent WMRSS Phase II Review Panel Report. The Solihull MBC v Gallagher Homes Limited and Lioncourt Homes Limited Judgment [2014] EWHC 1283 (Admin) was clear that the NPPF affected radical change in plan making.
- 2.2 The Housing White Paper (published in February 2017) establishes a national need for a minimum of between **225,000 to 275,000 new homes per year** to keep up with population growth and to start addressing decades of under-supply in housing delivery.
- 2.3 The West Midlands Combined Authority Strategic Economic Plan ('WMCA SEP') (June 2016) recognises the importance of planning to meet these ambitious levels of growth. Indeed housing is one of the Plan's eight priority actions. Clearly the BCCS Review needs to provide a robust strategy to meet the significant growth across the Black Country, reflecting the priority actions set out in the WMCA SEP.
- 2.4 The adopted BCCS did not release any Green Belt land for development. In stark contrast, the emerging BCCS proposes the release of Green Belt land to deliver a minimum of 14,270 dwellings in order to meet the Black Country's needs. This represents a significant departure from the approach of the adopted BCCS.
- 2.5 To date the BCCS has failed to meet the Black Country's needs since 2006. As at 31 March 2016 there is a shortfall of 3,039 dwellings against the stepped housing delivery trajectory.
- 2.6 Therefore a full review of the BCCS is essential to ensure:
- The plan is up to date and is prepared in the current planning context, and reflects the area's current needs (as opposed to those identified in the now revoked WMRSS).
 - All policies and objectives of the emerging BCCS Review are consistent with national planning policy.
 - It comprises a strategy which will deliver against the Black Country's identified needs, and one that is effective, and measurably so, when compared to the shortcoming of the adopted BCCS.
- 2.7 We discuss the need for a full review further in response to Q7, Q9 and Q21.

Q2. Do you think that the key evidence set out at Table 1 is sufficient to support the key stages of the Core Strategy review? If not, what further evidence is required and, if there are any particular issues that should be taken into account in considering development on any particular sites or in any particular areas?

- 2.8 The evidence base currently comprises employment studies that assess strategic sites, high quality employment land and regional logistics sites. Additional employment evidence is necessary to assess the entire supply of employment land across the Black Country, including the value, demand and characteristics of the existing supply. This will be crucial to informing whether it is feasible to release employment land to deliver approx. 10,400 new homes (Strategic Option 1B which is discussed further at Q11a).
- 2.9 If any existing employment sites are to be proposed for allocation as residential development, the evidence base should demonstrate the suitability of the land. This includes consideration of contamination issues, whether the land is a suitably attractive location for residential development with appropriate supporting community infrastructure, and whether neighbouring uses would conflict with the expectations of future residents.
- 2.10 A number of infrastructure studies (including flood risk / water, waste, and viability) are to be undertaken to inform the BCCS Review Preferred Options Paper. Infrastructure viability will be a key factor in determining the deliverability of sites to meet the area's housing needs and in particular there is a need for evidence to be collated to understand gaps in social infrastructure such as education provision. To provide a robust assessment of infrastructure, public consultation should be undertaken to ensure that a full picture is provided, as residents and landowners will have information of use.
- 2.11 These studies should also not just assess infrastructure within the Black Country exclusively, but also the infrastructure required outside of the area which may be required to meet its needs. For instance, some residents from within the Black Country attend schools in other authority areas, such as Birmingham and South Staffordshire. Cross boundary working with other authorities will be crucial in this respect.
- 2.12 It is also considered that the Black Country authorities include a robust landscape character assessment in the scoping of the evidence base document *Strategic Mapping of the Black Country's Natural Environment*.

Q3. Do you agree that the housing need identified for the Black Country over the period 2014-36 in the SHMA, and the anticipated amount of supply, are appropriate and in line with national guidance?

- 2.13 The consultation on a standardised approach to the calculation of OAN is scheduled for September 2017 and, according to correspondence from DCLG (dated 31st July 2017), any Plans which have not been submitted by March 2018 (as will be the case for the BCCS Review) will be required to apply the new standardised methodology.
- 2.14 In terms of the SHMA, the Objectively Assessed Housing Need ('OAHN') is derived from the 2014 Sub National Household Projections which PPG confirms represents the starting point for calculating need.

- 2.15 We reserve the right to comment further on the OAHN once the standardised methodology has been published, and used to calculate the Black Country's needs.

Q5. Do you agree with the proposed approach to the Black Country Green Belt Review? If not, what additional work do you think is necessary?

- 2.16 We discuss the strategy to meeting housing needs in the Green Belt in response to Q12a and Q13a.
- 2.17 The Green Belt Review should be a robust assessment, undertaken in accordance with national planning practice guidance and the NPPF, specifically taking account of the need to promote sustainable patterns of development and not including land which it is unnecessary to be kept permanently open.
- 2.18 As part of this the methodology for the Green Belt Review should be published for consultation prior to work commencing. This will be important to ensure the Review is robust and has the support of the development industry.
- 2.19 The I&O Report indicates the GBHMA Strategic Growth Study (renamed the 'Strategic Locations Study') will "inform and provide the basis" for the Black Country Green Belt Review.
- 2.20 The methodology for the Strategic Locations Study, made available in July 2017, is very broad; referring to the Green Belt will be assessed in 'five sections'. If the study is too broad, and the strategic areas identified too general, it will not form a sound basis for the Black Country Green Belt Review to conclude which land is suitable for Green Belt release. There may be opportunities within discounted areas for smaller parcels of land to be released as sustainable extensions to existing settlements.

Q6. 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? If not, what other key issues should be taken into account?

- 2.21 The nine key issues identified at Part 3 of the I&O Report represent the matters which will be integral to the BCCS Review achieving its ambitious plans for growth.
- 2.22 Mindful of the ambitious levels of growth proposed for the Black Country, the key issues relating to housing needs, providing infrastructure to support growth and reviewing the Green Belt, are the most important to take account through the BCCS Review.
- 2.23 The need to review the role and extent of the Green Belt in order to meet the housing needs of the area is strategically significant and a fundamental shift from previous policy. This of course needs to be balanced against the desire to regenerate and make best use of brownfield sites, but the scale of growth anticipated overall will require a step change in physical and social infrastructure (including highways, education and recreation provision), as recognised in paragraph 3.52 of the I&O Report.

Q7. Do you think that the Core Strategy vision and sustainability principles remain appropriate? If not, what alternatives would you suggest?

- 2.24 In Q1 we make the case for a full review of the BCCS. This would also necessitate a review of the vision and sustainability principles underpinning the Plan. This is

particularly relevant as to date the current vision has not delivered the necessary housing growth required by the BCCS.

- 2.25 The adopted BCCS vision and sustainability principles reflect the area's need at that time (i.e. February 2011). Since then the NPPF has been published and the WMRSS revoked. A new vision is therefore necessary to reflect the area's needs now, which are much higher than at the time the BCCS was adopted, which is demonstrated by the admission that Green Belt land will be necessary. In contrast, no Green Belt was released by the adopted BCCS (indeed the boundaries have not been altered for over 30 years).
- 2.26 Furthermore, the adopted BCCS' vision is underpinned by three 'major directions of change', none of which specifically refer to meeting the Black Country's housing needs or the infrastructure to support this. The BCCS Review vision would be more robust if it was underpinned by the nine key issues set out at Part 3 of the I&O Report and made direct reference to the supply of new homes and the infrastructure required to enable the growth required over the plan period.

Q8. Do you think that the Core Strategy spatial objectives remain appropriate? If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?

- 2.27 Similarly to the BCCS' vision and sustainability principles, the spatial objectives must be reviewed to ensure they are up to date. The BCCS Review will be produced in a completely different national, regional and local planning context to that of the adopted BCCS. In particular the existing objectives will not form a sound basis to deliver the anticipated levels of growth of the Black Country, let alone the current levels proposed by the BCCS.
- 2.28 Meeting the emerging housing needs will underpin the BCCS Review. It is therefore imperative they these needs are reflected in the objectives, which will be used to measure the success of the Plan. The objectives must also be more robust and refer to the infrastructure required to support the identified growth, if they are to be meaningful.

Q9. Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network? If not, what changes do you think should be made to Policies CSP1 and CSP2 in response to new challenges and opportunities?

- 2.29 We set out in response to Q1 that a full review of the BCCS is necessary given the change in the planning policy, namely the publication of the NPPF and the revocation of the WMRSS. Policies CSP1 and CSP2 therefore need to be reviewed and updated. This is particularly relevant given neither policy reflects that a proportion of the Black Country's growth needs cannot be met within the urban area (which is explicitly acknowledged at paragraph 3.17 of the I&O Report), necessitating the release of land from the Green Belt.

Q11a. 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?

- 2.30 There is a need for the Black Country Authorities to accommodate 81,190 new homes and up to 300 ha of new employment land between 2014 and 2036. It is clear that both will require significant new land and infrastructure to support this level of growth, and this will require a different spatial strategy to the current one.
- 2.31 There is currently a deficit of 57 ha gross of employment space across the Black Country. The monitoring data at Appendix C of the I&O Report identifies that there is a surplus in local quality employment land (146 ha), but a deficit of 218 ha in high quality employment land. This does not distinguish between different types of employment, including different use classes and size or characterisation.
- 2.32 The Black Country's employment land is characterised by its supply of smaller industrial units which are typically adjacent to residential areas. Whilst some of the businesses may not be 'friendly' to neighbouring uses, these types of units form the back bone of the Black Country economy and their loss would negatively impact business in the area. The loss would also remove local, sustainable job opportunities.
- 2.33 As set out in our response to Q2, further employment land supply evidence is required to achieve the right balance between protecting smaller urban sites which have numerous benefits in providing affordable space for start-up and smaller businesses, which represent a significant proportion of the Black Country economy, and the need to provide larger high quality sites to meet the needs of modern industries and new operators, and their need for better accessibility to markets. This will facilitate the redevelopment of some sites for housing, but the Black Country faces choices with an overall employment land deficit of 300 ha. It cannot simply turn all of its employment land over to housing.
- 2.34 The Councils should also be mindful of the viability of regenerating employment land for residential use, and whether the market can sustain viable development on these sites. This is demonstrated by the number of previously developed sites in the Black Country allocated for housing in previous plans which are yet to be delivered, and show no sign of doing so in the near future.

Q12a. 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.

- 2.35 Please refer to our response to Q13a.

Q13a. Do you support Spatial Option H2? What should the characteristics of Sustainable Urban Areas (SUEs) be? e.g. minimum / maximum size, mix of uses, mix of housing types, accessibility to other areas. What criteria should be used to select suitable sites? e.g. proximity to a rail station, availability of existing infrastructure, easy access to jobs, potential to support existing settlements/ services, proximity to the existing growth network, potential to support urban regeneration.

- 2.36 OSH support the broad Housing Spatial Option H2 – Sustainable Urban Extensions.

- 2.37 Whilst there is no definition to the housing numbers associated with 'rounding off', this has been taken as any development site consisting less than 500 dwellings (the minimum threshold defined for SUEs).
- 2.38 The NPPF and PPG do not refer to 'rounding off' the Green Belt. The NPPF states at paragraph 85 that the boundaries of the Green Belt should be defined clearly, using physical features that are readily recognisable and likely to be permanent. These boundaries should be long term and enduring, and will not require adjustment at the end of the plan period.
- 2.39 Subject to meeting the requirements of the NPPF and PPG, rounding off of the edges of the urban area within the Green Belt could assist in meeting some of the Black Country's identified housing needs without breaching the principles of including land within the Green Belt, however the I&O Report acknowledges that Option H1 would not meet all of the Black Country's outstanding housing growth.
- 2.40 Larger SUE sites will provide significant contributions towards delivering improved infrastructure given their critical mass. Sites such as that at Racecourse Lane, will also seek to provide the infrastructure required to support the identified growth, in this case by incorporating a primary school and girls secondary school within the masterplan for development. Relying too heavily on smaller sites through rounding off, would compromise the Black Country's ability to deliver new infrastructure to meet its growth aspirations.
- 2.41 Furthermore, a number of SUEs will be required if the Black Country's housing shortfall, which cannot be accommodated within the existing urban area (between 14,270 and 24,670 dwellings), is to be met. There is advantage in having a number of SUEs located around the edge of the built up area to provide the market with choice and to ensure that houses can be delivered simultaneously in a number of different market locations.
- 2.42 Large scale planned development, which is allocated within a Local Plan, provides certainty and developer confidence, as recognised by paragraph 52 of the NPPF. Therefore, large sites are more likely to deliver and can accommodate multiple housebuilders and market outlets, increasing the rate of delivery once the required infrastructure has been installed.
- 2.43 Spatial Option H2 is therefore the most appropriate strategy for accommodating the area's housing shortfall, however Spatial Option H1 can make a small contribution in the right locations.
- 2.44 Any site selection criteria should reflect the NPPF, recognising that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or **can be made** sustainable. Whilst a potential SUE may not be immediately adjacent to local services or a rail station (which will be the case for the majority of the SUEs given their location on the edge of the urban area), there is the potential to make it more sustainable through new transport links (such as bus services) and on site provision.
- 2.45 Given the critical mass of SUEs, they have the potential to sustain significant on site services. The Racecourse Lane Masterplan (enclosed at **Appendix 3**) demonstrates

how new educational facilities could be provided alongside a new residential community, serving the needs of existing and future residents.

- 2.46 The BCCS Review should also not make assumptions that SUEs will have major impacts on Green Belt purposes and environmental assets (as suggested in the 'challenges' section for Spatial Option H2). Firstly, any site's performance against Green Belt purposes is separate to any site selection process and the NPPF makes clear that the purpose of reviewing the Green Belt is to promote sustainable patterns of development. SUEs can have many environmental benefits, including delivering significant public open space, providing access to the countryside, as well as biodiversity enhancements.

Q13b. What infrastructure do you think would be needed for different sizes of SUEs?

- 2.47 It is recognised (at paragraph 6.44 of the I&O Report) that increased birth rates have significantly increased the need for new primary school places, which is now working through to secondary schools and is placing pressure on the school estate. Therefore, the potential for educational facilities at Racecourse Lane will contribute towards meeting this need, serving existing residents in the area and also providing educational facilities to support the ambitious growth across the Black Country.
- 2.48 However, on a general scale for the purpose of the BCCS Review, for the reasons provided in response to Q12a and Q13a, further evidence will be necessary to inform infrastructure requirements for each SUE, including school and healthcare provision. The I&O Report indicates a number of infrastructure assessments are to be undertaken before the Preferred Options version of the BCCS Review is published. Furthermore, the Councils should be mindful of site specific evidence bases prepared by developers.
- 2.49 The Black County authorities should also liaise with the relevant statutory undertakers (such as Severn Trent and Western Power Distribution) to ensure the BCCS Review includes a robust Infrastructure Delivery Plan.

Q13c. Are there any potential locations that should be considered for SUEs (please submit through the 'call for sites' form) and what infrastructure would be required to support these?

- 2.50 The land at Racecourse Lane, Stourbridge, represents a unique opportunity for an educational led development alongside a new residential community and health care facility. OSH's aspirations are to create a new development with a 2 form mixed primary school for circa 420 pupils, and also a 3 form girl's secondary school for circa 450 pupils to compliment the Foundation's existing boy's school and extend its education provision to more of the local community. The masterplan includes significant high quality open space, parkland and green infrastructure, promoting a well-balanced and sustainable development opportunity.
- 2.51 We explore the infrastructure requirements of the site further in the Call for Sites form (**Appendix 2**) and Racecourse Lane Masterplan (**Appendix 3**) enclosed with these representations.
- 2.52 Given the site's location within the Green Belt we provide an assessment against the five purposes for including land within the Green belt below.

Purpose 1 – To check the unrestricted sprawl of the large built-up areas

- 2.53 The site is bounded by residential development to the north, west, east and south-east. The proposed masterplan includes the relocation of the 18-hole golf course (circa 43 hectares) to the south of Racecourse Lane and the redevelopment of the existing Stourbridge Golf Course principally for housing. As such, the new development would be enclosed by existing built form along three boundaries and the new golf course will act as a boundary to the south, restricting any sprawl of the built-up area. Racecourse Lane will provide a strong defensible boundary for the Green Belt along much of its length.
- 2.54 Consequently, the release of the site from the Green Belt would not result in unrestricted sprawl of the built up area further south than Stourbridge currently extends to the south and south-west.

Purpose 2 – To prevent neighbouring towns merging into one another

- 2.55 The relevant purpose of the Green Belt in this location is to contain the overall conurbation to prevent it merging with Kidderminster (the nearest large town) and to a lesser degree to prevent Stourbridge merging with Hagley (a smaller settlement only partially separated from the conurbation).
- 2.56 The release of the Racecourse Lane site from the Green Belt would not result in Stourbridge merging with Hagley nor of the conurbation getting any closer to Kidderminster.
- 2.57 As set out above, the residential development would be enclosed by Racecourse Lane to the south, acting as the firm defensible boundary.

Purpose 3 – To assist in safeguarding the countryside from encroachment

- 2.58 Any development on land formerly in the Green Belt will to a degree extend into areas that are currently open. The land at Racecourse Lane is principally an existing golf course bounded on three sides by existing residential areas. By relocating the golf course to the south of Racecourse Lane where it can remain in the Green Belt, the residential development and the new schools can be located so as not to extend into open countryside. There is a pronounced ridge to the south of Racecourse Lane and there will be limited long distance views from the countryside into the site, other than those which would primarily be of the new golf course.

Purpose 4 – To preserve the setting and special character of historic towns

- 2.59 The site is not situated within the setting of a historic town and as such this purpose is not considered to apply in this circumstance.

Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 2.60 The BCCS Issues and Options Report sets out that there is a requirement for the Black Country Authorities to accommodate a shortfall of approximately 22-25,000 new homes. It has been established even with increased densities, the Black Country has severely limited opportunities to accommodate this level of growth within the urban area and it is therefore necessary to consider Green Belt release. The ongoing recycling of derelict and other urban land will also be needed to deliver the scale of housing and employment growth needed.

Q13d. 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?

- 2.61 Any guidance for SUEs should not be considered until later in the preparation of the Plan, and should be informed by the relevant evidence base (including site specific evidence, the SHMA, and infrastructure assessments). Any guidance should be flexible to ensure the Plan is able to respond to the most up to date evidence and be in line with paragraph 173 of the NPPF.

Q15a. If all housing need cannot be met within the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA? 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?

- 2.62 The NPPF is clear that local planning authorities should have fully explored all available options for delivering their housing needs within their own administrative boundaries before considering exporting growth to neighbouring authorities or the wider HMA. Equally, neighbouring authorities will not accept accommodating any of the Black Country's needs if this exercise has not been thoroughly undertaken. Telford and Wrekin has so far declined to assist in meeting any of the Black Country's shortfall given this exercise had not been undertaken. As such this option should only be considered as a last resort. This option would also put further pressure on infrastructure in adjoining areas, which would need to be accommodated.
- 2.63 On this basis the Black Country should be seeking to accommodate all of its proposed growth within its own boundaries.

Q21. 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?

- 2.64 As set out in our response to Q1 a full review of the BCCS is necessary. This applies to Policy DEL1 also, particularly as the policy currently only reflects development within the urban area.
- 2.65 Given the characteristics and viability matters which differ between brownfield and greenfield sites, the BCCS Review should have separate policies for each.

Q22. Do you have evidence of a requirement for new social infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.

- 2.66 Paragraph 6.44 of the I&O Report acknowledges that as a result of increased birth rates, there is a requirement for new primary school places and this is now working through to secondary schools. The existing pressure on places will only be exacerbated as the levels of growth anticipated in the Black Country's economic strategy follow through into population growth.
- 2.67 Paragraph 70 of the NPPF establishes that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should (amongst other

issues) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. Consequently, the development potential at Racecourse Lane presents a prime opportunity to meet the requirement for future education provision, in a sustainable location in close proximity to existing and proposed residential communities.

Q25. Will there be any new social infrastructure requirements necessary to serve large new housing developments? If yes, please explain the type and scale of any new social infrastructure required.

2.68 Please refer to our response to Q28.

Q28. Do you think physical infrastructure is necessary to serve large new housing developments? If yes, what type and scale of physical infrastructure is necessary?

2.69 Paragraph 5.7 of the I&O Report sets out that as options for the location of major new housing allocations develop through the review process, so will decisions about the need for any such facilities and their locations.

2.70 This approach will be necessary to understanding the full infrastructure requirements for new sites. As set out in response to Q2, the infrastructure assessments to be undertaken will be crucial in understanding these requirements further. This should also be informed by any site specific evidence base work undertaken by developers, as well as liaison with infrastructure providers (including statutory undertakers).

Q29. Do you think there are any other tools or interventions that could be used to ensure enough infrastructure is provided by developments?

2.71 As set out in response to Q2, the infrastructure assessment work to be undertaken by the authorities as part of this review will be critical in establishing the existing shortfall and future requirements to support growth.

2.72 Since the BCCS was adopted, it is apparent many brownfield sites are marginally viable at best and will struggle to deliver the necessary infrastructure required (as much is acknowledged at Section 2 of the I&O Report). There will be a need for public sector intervention and funding to deliver the scale of brownfield development anticipated. Also, where markets are weaker, it should not be anticipated that greenfield development can subsidise or provide infrastructure beyond what is required to support the development itself. Whether through CIL or S106, policy must be realistic and flexible to ensure that development can come forward on the scale and at the pace required to deliver growth and meet housing need.

Q31. Do you think that the right scale and form of funding is available to support the delivery of the Core Strategy Review? If no, what alternative sources of funding or delivery mechanisms should be investigated?

2.73 The recently published WMCA Land Delivery Action Plan identifies sources of funding and immediate priorities. Of the £200m Land Remediation Fund, £53m is already allocated to the Black Country and a further strategic package of £97m is available to be drawn down by the LEP. However, the plan states on page 44 that “to fund the current pipeline of brownfield sites in the Black Country, a total of £700m of further LRF funding is required”. This, it states, will be a key requirement of the Housing Deal the WMCA is hoping to negotiate with CLG.

2.74 Whilst the funding to date is a good start, it is clear that it is a fraction of the total needed to deliver a substantial step change in brownfield delivery. As set out in our response to Q29, it is crucial the four authorities are satisfied of the scale and pace of delivery and that it is viable for new development on brownfield sites to contribute towards providing infrastructure to meet their needs. The role of greenfield locations to deliver market housing and contribute fully to meeting infrastructure costs should therefore be a key component to derisk the BCCS housing strategy.

Q32. Do you think that the proposed approach to incorporate health and wellbeing issues in the Core Strategy review is appropriate? If no, please provide details

2.75 Please refer to our response to Q34b.

Q33. Is there more that the Core Strategy can do to address health and wellbeing issues in the Black Country? If yes, is a new policy needed to address such issues for example?

2.76 Please refer to our response to Q34b.

Q34a. Do you agree that the health and wellbeing impacts of large development proposals should be considered at the Preferred Spatial Option stage of the Core Strategy review through a Health Impact Assessment approach?

2.77 Please refer to our response to Q34b.

Q34b. What design features do you think are key to ensuring new development encourages healthy living, which could be assessed through the HIA process?

2.78 We support the strategy to incorporate health and wellbeing issues in the BCCS Review. Health and wellbeing underpin sustainable planning and creating places where people want to live.

2.79 The Health and Wellbeing Technical Paper (June 2017) emphasises the importance of integrating health and wellbeing into all policies, including those of the emerging BCCS Review. In particular, the technical note encourages the creation of communities which are:

- Well-connected and walkable;
- Have a wide choice of homes;
- Accessible to services; and
- Where people can belong to a cohesive community which fosters diversity, social interaction and social capital.

2.80 As such, health and wellbeing should not be standalone policies in the plan, but rather should be a 'golden thread' running through the review and all policies. Any sites promoted through the Local Plan process should demonstrate their health and wellbeing benefits if they are to be proposed for allocation.

Q35. Do you support the proposed approach to housing land supply? If no, please explain why.

- 2.81 The BCCS Review proposes at paragraph 6.30 to 'update' Policy HOU1. As set out in our response to Q1 a full review of the Plan is necessary given there are now greater housing needs, the NPPF has been published and the WMRSS has been revoked, and the adopted BCCS has not been delivering the required level of growth. As such the approach to housing land supply should be reviewed in full also.
- 2.82 Given there is a shortfall of 3,039 dwellings against the targets set in the adopted BCCS, largely as a result of brownfield sites not being developed due to viability issues, the Review should include a 10% lapse rate applied to the requirement to ensure flexibility in deliverability should sites in the supply not come forward.

Q36. Do you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed? Yes/ No; If yes, what standards should be applied instead, for example should the minimum net density of 35 dwellings per hectare be increased to maximise brownfield housing delivery?

- 2.83 Please refer to our response to Q42.

Q40. Do you agree that the 2017 SHMA findings should be used to set general house type targets for the Plan period? Yes/ No; If no, please explain why.

- 2.84 Please refer to our response to Q42.

Q42. Do you agree that the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? If no, please explain why.

- 2.85 The NPPG states that wherever possible, local needs assessments should be informed by the latest available information and the government's official population and household projections are generally updated every two years.
- 2.86 The affordable housing requirement; preferred housing mix; housing types; and density standards for the Black Country therefore need to remain fluid in order to respond to the most up to date evidence and market conditions. The BCCS Review should not comprise policies that set standards for the whole Plan Period. The standards set out in Policy HOU2 should be reviewed in full to ensure they comply with the NPPF, PPG and the most up to date guidance.

Q47. Do you think that Policy HOU5 should be expanded to cover other types of built social infrastructure and to set out standards for built social infrastructure to serve major housing developments? Yes/No; If no, please explain why.

Paragraph 6.46 of the I&O Report acknowledges that Community Infrastructure Levy contributions cannot provide sufficient sums to wholly fund new education and healthcare facilities and running costs. Therefore, the proposals presented by OSH should be assessed favourably by the Councils as it promotes a suitable opportunity to provide education provision as is required across the Black Country. This proposed education provision will be situated in a sustainable location, in close proximity to existing and potential future residents.

3. Conclusion

- 3.1 We welcome the opportunity to engage with the Black Country authorities in respect to the emerging BCCS Review.
- 3.2 Since the Black Country Core Strategy (BCCS) was adopted in February 2011 the West Midlands Regional Spatial Strategy has been revoked and the National Planning Policy Framework has been published, representing a significant change in the planning policy context. The Black Country's ambitious housing and employment needs are now much greater, and the area has not been meeting the targets set out in the BCCS. A full review of the Plan is therefore necessary to ensure it is robust and meets the requirements of national planning policy.
- 3.3 In meeting the proposed level of growth Green Belt release will be necessary. OSH is promoting land at Racecourse Lane for residential and educational development. The site is in a sustainable location and can make a significant contribution to meeting the Black Country's housing needs as well as education provision which, in conjunction with the present boy's school, can support the future residential occupiers as well as existing residents.
- 3.4 Sustainable Urban Extensions such as that proposed at Racecourse Lane can play a critical role in meeting the Black Country's anticipated level of housing growth. It will provide a critical mass which can sustain new services and facilities on the site, and will deliver environmental benefits, contributing to the health and wellbeing of existing and future residents.
- 3.5 We trust that the information provided within these representations will be considered by the Black Country Authorities and we welcome the opportunity to engage and promote the site through the progression of the BCCS Review.
- 3.6 We would welcome meeting the Black Country authorities to discuss these representations and the enclosed Masterplan, Transport Technical Note and Call for Sites form.

Appendix 1: Site Location Plan



AREA
38 Hectares
93.9 Acres

AREA
167.8 Hectares
414.64 Acres

AREA
18.4 Hectares
45.5 Acres

Appendix 2: Call for Sites Form

Black Country Core Strategy Review - Call For Sites Form

The four Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton) are inviting land owners, developers and other bodies to put forward sites to be considered for development as part of the Black Country Core Strategy Review.

Call for Sites submissions should only be made for sites within the Black Country or sites within neighbouring authorities but adjoining the Black Country urban area. However, submissions will be accepted for any site within a neighbouring authority which could potentially form part of a larger development which would adjoin the Black Country urban area, to allow discussions to take place with adjoining authorities. If your submission relates to a site which stretches beyond the Black Country into a neighbouring authority then this should be clearly stated and evidence of submissions to that neighbouring authority provided.

This form asks you to provide details about the site including location, ownership, current use, access, constraints, services and possible future use. Please provide as much information as possible to ensure your site proposal can be carefully considered. You can submit as many sites as you wish by completing a separate form and site boundary for each site.

It should take around 15 minutes to complete the information for each site you wish to put forward, depending on the amount of detail you wish to provide.

If you are acting on behalf of someone else you will be asked to provide their details.

The information you provide will be used to help prepare the Core Strategy review and will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the process. Please note that the local authorities are obliged to make the Call for Sites submissions available for public inspection. This means that, with the exception of telephone numbers, email addresses and signatures, your comments and other personal details that you provide will be publicly available. We therefore encourage you to avoid providing sensitive information that you do not wish to be published.

If you have any queries about the questionnaire please contact:
blackcountrycorestrategy@dudley.gov.uk

call: Dudley: 01384 814136 | Sandwell: 0121 569 4249 | Walsall: 01922 658020 |
Wolverhampton: 01902 554038

Please complete and submit by 5pm on the 8th September 2017.

Please provide your up-to-date contact details. If you are acting on behalf of someone else you will be asked to provide their details later in the questionnaire. Fields marked *will not be shared with anyone outside the Core Strategy review process. The contact details you provide will be held securely but we are required to publish your name and / or organisation alongside your submission.

1. Title

Miss

2. First Name

Alice

3. Last Name

Fitton

4. Organisation/Company Name (where relevant)

Turley

5. Address Line 1*

9 Colmore Row

6. Address Line 2*

Birmingham

7. Address Line 3*

8. Post Code*

B3 2BJ

9. Email Address*

alice.fitton@turley.co.uk

10. Phone Number*

0121 234 9114

Details for Site

11. Are you acting on behalf of someone else? Tick one only.

No

Yes - on behalf of someone else (you must provide details in Q36)

The following questions ask about the ownership of the site and vehicle access

12. What is your / your client's interest in this site? If you are an agent please answer on behalf of your client only. Please select all that apply.

Sole owner

Part owner

Potential Purchaser

Developer - you intend to construct the development yourself if the site is allocated and planning permission is subsequently obtained.

Operator - you intend to operate the development yourself, e.g. manufacturer, hotel, mineral extraction.

Public Body or Utility Company

Amenity / Community Group

Local Resident

Other - Please specify

If other, please specify.

Charity

13. Please provide details of the other owner(s) if known.

N/A

14. Does the other owner(s) support your proposals for the site? Tick one only.

Yes

No

Don't know

15. Is there direct vehicle access to the site i.e. from a public road? Tick one only.

Yes

No

Don't know

16. Please provide information about the ownership (if known) of any land that would be needed to provide vehicle access.

Not required. Access from public road

Details for Site

The following questions ask about the location of the site. You are required to map the location of the site using a link on the consultation website once you have completed this questionnaire.

17. Site Name

Racecourse Lane, Stourbridge

18. Site Address

Racecourse Lane, Stourbridge

19. Postcode

Middle of Racecourse Lane is DY8 2RJ

20. Site Area in Hectares

226 hectares

21. Site Area in Hectares of land suitable for development, if different to above

Circa 46 ha of built development (with 43 ha of relocated golf course in the Green Belt)

22. Please provide a brief summary of the current use(s) of this site or last known lawful use(s)

Golf course, farm land and grazing

Details for Site

The following questions ask what you think the site could potentially be used for, what services are available and any related constraints on the site.

23. What use or mix of uses do you propose for this site? Please tick all that apply.

Private Market Housing

Affordable Housing

Industry or Storage (Use Classes B1b/c, B2 or B8)

Offices (Use Class B1a)

Gypsy and Traveller/
Travelling Showpeople
Site

Waste

Management

Mineral

Extraction

Retail

Open Space or Sports Pitches

Community Facilities (including health or education)

Sports / Leisure

Any other use
(please specify below)

Any other use or a more specific proposed use for the site e.g. type of employment or type of open space please specify

1 new Primary School, 1 new Girls' Secondary School, a relocated health centre and relocated golf course

24. If housing or employment is proposed, please specify how many homes or how many hectares of employment land you think could be accommodated on the site.

At least 500 dwellings, subject to further capacity testing

25. What services are currently available at this site? Tick all that apply

Mains water

Mains sewage

Electricity

Gas

Oil

Broadband

None

Not Known

26. What constraints, if any, affect this site? Please provide details below for each constraint.

- Land in other ownership must be acquired to develop the site
- Restrictive covenants - what land uses do these prevent or require?
- Current use needs to be relocated
- X Rights of way (public or otherwise) across the site
- Contamination known or suspected
- Previous mining activity known or suspected
- Public Open Space
- Flood risk / drainage problems
- Ground instability (not linked to mining)
- Watercourse / culvert / other water body
- Area of mature woodland / tree preservation order
- Undulating or steeply sloping ground
- Underground services
- Pylons crossing the site / sub – station
- Constraints on adjoining land e.g. railway line, noisy industry
- X Protected species / habitats
- Historic building / landscapes
- None of these

Please provide supporting details for each constraint identified above.

Footpath and local habitat on golf course
Minor substations on edge of area and some telegraph poles

27. Is the site agricultural land? If so, then what is the agricultural land classification? Please provide survey results, including mapping.

Not known

28. **If there is a current use of the site that needs to be relocated what arrangements are required to achieve this relocation? e.g. manufacturer currently on the site needs to move to a building of xx square meters with good access to the motorway.**

N/A – relocation of golf course included in plan for site

29. **What new infrastructure do you think will be required to support the development of the site?**

- Major Roads
- Flood mitigation system
- X Primary School
- X Secondary School
- Local shops
- A new local centre
- A new park / open space
- Footpaths and cycleways
- X Other

Please provide supporting details for the above.

Health facility

30. **Are there any existing or historic planning permissions on the site? If yes please include any details e.g. application reference number.**

X Yes No Don't know

Planning application by Golf Club for a practice area (P09/0282/E1) approved
Planning application for school sports field (withdrawn – built elsewhere – P04/0240)
Planning application for sports field (P94/50088) – approved

31. **Is the land available immediately for development (subject to obtaining any necessary planning permissions)? Tick one only.**

X Yes No Don't know

If no, please explain why not and give an estimated timescale for when it will become available.

32. Is there any current market interest in the site, other than from you / your client? Tick all that apply.

- Owned by developer
- Under option to developer
- Enquiries received from prospective purchasers / developers
- Site being marketed
- None
- Not known

Please provide further details of the market interest in this site.

Numerous enquiries from national housebuilders and promoters

33. Once started how many years do you think it would take to develop the site?

5 – 8 years, although intention would be to commence construction of the schools as early as possible due to funding window

34. Do you think it is likely that there will be viability issues with developing the site that will require the use of external funding?

No

35. Have you previously contacted a Black Country or neighbouring authority about this site? Tick one only.

- Yes No

If yes, please provide brief details e.g. who you contacted and when and the current position of discussions.

Meeting with Head of Planning and strategic planning colleagues at Dudley MBC

36. Please provide any additional comments you may have that are relevant to the site you are putting forward.

Please see representations report (submitted 8 September 2017)

37. Each site will need to be visited to enable an assessment of the site. By completing this form you consent to Council employees (or their representatives) visiting the site. Visits will be conducted unaccompanied wherever possible. Where there are reasons why an unaccompanied site visit would not be practical please indicate below so that alternative arrangements can be made.

N/A

If acting on behalf of someone else please provide details here

Please provide the details of the individual or organisation you are representing. Please ensure you have consent from the individual or organisation prior to providing their details. Fields marked *will not be shared with anyone outside the Core Strategy review process.

38. Title

39. First Name

40. Last Name

41. Organisation / Company Name

The Feoffees of Old Swinford Hospital

42. Address Line 1*

C/O Agent

43. Address Line 2*

44. Address Line 3*

45. Post Code*

46. Email Address*

C/O Agent

47. Phone Number*

C/O Agent

48. Has the landowner been informed of this Call for Sites submission? Tick one only.

Yes

No

Site Boundary

The boundary of your site must be mapped and provided on an OS based map at a scale that shows field, property and adjacent road boundaries.

All of the site boundaries and Call for Site forms will be reviewed by the four authorities for accuracy. Following this all mapped sites will be visible to the public.

If you would like us to consider other documents, such as draft layout plans, masterplans or design statements, please attach these to your site submission.

Thank you for submitting your site details. If you wish to submit details for further sites please complete a new form.

Appendix 3: Racecourse Lane Masterplan



Primary School
2.2 HECTARES
5.4 Acres

Secondary School
3.7 HECTARES
9.1 Acres

Residential Area
3.1 HECTARES
7.6 Acres

Residential Area
24 HECTARES
59 Acres

Residential Area
6 HECTARES
14.5 Acres

Residential Area
7.6 HECTARES
18.8 Acres

New 18 Hole Golf Course
43 HECTARES
107 Acres
(LAYOUT FOR ILLUSTRATIVE PURPOSES ONLY)

Open Fields
118 HECTARES
291 Acres

18.4 HECTARES
45.5 Acres

Turley Office
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Turley