

Black Country Core Strategy
Issues and Options Report
Representations on behalf of HIMOR
(Land) Ltd

September 2017

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1. Introduction

- 1.1 These representations are made on behalf of HIMOR (Land) Ltd (hereafter referred to as 'HIMOR'), who own and are promoting land off Birmingham Road, Great Barr ('the site').
- 1.2 HIMOR is a privately owned property investment and land promotion company, who is a trusted partner for local authorities seeking major economic developments. HIMOR have worked closely with many local authorities to deliver signature developments, including Trafford Metropolitan Borough Council (MBC), Stockport MBC, Wigan MBC, Manchester City Council and the Greater Manchester Combined Authority. HIMOR's track record and expertise provide great confidence that this opportunity can be fully maximised.
- 1.3 The site is located within the administrative area of Sandwell MBC. Sandwell MBC forms one of the four authorities (along with Dudley, 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 HIMOR 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**)
 - Vision Framework for a Strategic Development Opportunity – Land off Birmingham Road, Great Barr (**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 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, and whether existing neighbouring uses would provide an issue for 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. To provide a robust assessment of infrastructure public consultation should be undertaken. This will ensure that a full picture regarding infrastructure viability is provided, as residents / landowners will have information which the Black Country authorities' assessment work may not be aware of.
- 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 three key issues relating to housing needs, 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 should be seen as a golden thread throughout the BCCS Review, reflecting issues specific to the Black Country. The key to unlocking this significant level of growth will be providing sufficient infrastructure (including highways, education and recreation).

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. 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.

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 than those of the current BCCS 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 At the current time there is an established 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 are pressing needs which will require significant land.

- 2.31 There is currently a deficit of 57 ha of gross 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.
- 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. Through this there may be opportunities to replace derelict employment land with housing, however new employment sites tend to be of higher quality, reflecting more modern industries (such as large logistic sites). They are unlikely to replace the smaller industrial unit stock, which have numerous benefits including lower rents, being suited for 'start up' and smaller businesses which reflect of the Black Country's employment profile. New large, greenfield strategic employment sites are unlikely to be affordable for the types of businesses which currently occupy the smaller industrial unit stock. With the Black Country facing an overall employment land deficit of 300 ha, the authorities should be seeking to protect the smaller industrial stock where possible and not maximising it for residential uses.
- 2.34 As illustrated in the Vision Framework submitted with these representations (**Appendix 3**), land off Birmingham Road at Great Barr presents an opportunity to deliver a significant employment hub alongside new homes. The site is situated in an accessible location, strategically positioned in close proximity to Junction 7 of the M6.
- 2.35 Given the sites flexibility, there is potential for employment development to be delivered in different formats and across a range of use classes, ultimately enabling a development to complement:
- The ambitions of the Sandwell MBC Economic Prospectus;
 - The success of the Black Country LEP in establishing a strong business hub at the heart of major markets; and
 - The emergence of the WMCA as a driver of economic growth and skills training and as a facilitator of strategic regional planning.
- 2.36 Given the deficit of 218 ha in high quality employment land, the potential for employment development at the site could help to deliver a high quality employment that is compatible with and respectful of existing and potential new residential communities.
- 2.37 The Councils should also be mindful of the viability of regenerating employment land for residential use, and whether the market could sustain development on these sites. This is demonstrated by the number of previously developed sites in the Black Country allocated for housing but is 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.

2.38 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.

2.39 HIMOR support the broad Housing Spatial Option H2 – Sustainable Urban Extensions.

2.40 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).

2.41 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.

2.42 Subject to meeting 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, however the I&O Report acknowledges that Option H1 would not meet all of the Black Country’s outstanding housing growth.

2.43 Larger SUE sites will provide significant contributions towards delivering improved infrastructure given their critical mass. 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.

2.44 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.

2.45 Turley is a member of the Home Builders Federation and regularly advises national and local housebuilders. It is unlikely there will be significant market interest in sites of less than 50-100 dwellings. Housebuilders require certainty in their own supply. A site of less than 50-100 dwellings would provide one or two years supply maximum, whereas an SUE site would offer between three and five years supply, depending on the size of the site.

2.46 Furthermore the costs associated with installing infrastructure for a site, including constructing the site access, connecting to the appropriate utility grids, establishing a compound, are broadly similar for small and larger scale development. As such smaller sites are less cost effective for housebuilders. This could significantly compromise the potential delivery of the Black Country’s housing needs.

- 2.47 In contrast SUEs are likely to have greater market interest. 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 the sites are more likely to deliver, and can accommodate multiple housebuilders and outlets, increasing the rate of delivery once the required infrastructure has been installed.
- 2.48 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.
- 2.49 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.
- 2.50 Given the critical mass of SUEs, they have the potential to sustain significant on site services.
- 2.51 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 the Green Belt purposes is separate to any site selection process. The Green Belt Review is a separate exercise to determining the sustainability of a site. Secondly, SUEs in the Green Belt can have many environmental benefits, including delivering significant public open space (it is widely recognised the Black Country Green Belt is largely inaccessible), as well as biodiversity enhancements.

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

- 2.52 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.
- 2.53 Furthermore, the Councils should be mindful of site specific evidence bases prepared by developers. HIMOR are exploring infrastructure requirements for land off Birmingham Road, Great Barr and intends to submit this assessment work during the plan-making process.
- 2.54 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?

- 2.55 Land off Birmingham Road at Great Barr provides the foundation for high quality development that can combine key attributes of great location, distinctive environment and high design quality.
- 2.56 At approximately 27ha in area, this is a highly flexible site that could deliver mixed use development with both residential and employment potential, performing roles that meet a variety of needs. Development here has the potential to enhance the sustainability and accessibility of existing communities and facilities, delivering greater diversity, greater choice and greater sense of place. Ultimately, this can create a healthy and interactive development that enhances quality of life for new and existing residents.
- 2.57 In particular, the location and scale of the site can support development that:
- Makes a significant contribution to strategic planning and economic growth ambitions of Sandwell, the Black Country and the wider West Midlands region;
 - Meets evidenced housing and/or employment needs;
 - Allows balance between built form, open landscape and green space assets;
 - Enhances access to the Rushall Canal corridor through to Sandwell Valley Country Park;
 - Creates new accessible green space;
 - Facilitates enhancements to local wildlife value;
 - Creates and improves links between existing community assets including the Q3 Academy; and
 - Makes use of natural topographic characteristics to shape and enhance local views.
- 2.58 We explore the infrastructure requirements of the site further in the Call for Sites form (**Appendix 2**) and Vision Document (**Appendix 3**) enclosed with these representations.
- 2.59 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***
- 2.60 The site is bound by residential development to the north and east; Q3 Academy is located to the south; the west of the site comprises West Bromwich Albion FC Training Ground and Aston University Sports Pitches.
- 2.61 As such, the release of the site would not result in any unrestricted sprawl of the built up area and it will in fact be enclosed by existing urban form and land uses.

Purpose 2 – To prevent neighbouring towns merging into one another

- 2.62 An important requirement of the Green Belt is to prevent neighbouring towns from merging however paragraph 85 of the NPPF sets out that there may be opportunities for land to be released from the Green Belt that would assist in creating longer term permanent defensible boundaries.
- 2.63 The site currently presents a gap in the urban form of Great Barr and to release this site from the Green Belt would not result in any neighbouring towns merging into one another.

Purpose 3 – To assist in safeguarding the countryside from encroachment

- 2.64 Paragraph 84 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. As such, development should be focussed towards urban areas inside the Green Belt boundary, towards towns and villages.
- 2.65 The site is enclosed on all four boundaries, with residential development, Q3 Academy, Aston Sports Pitches and the West Bromwich Albion FC Training Ground. As such, in accordance with the guidance set out in the NPPF, the site is located towards the urban area of Great Barr and the release of this site from the Green Belt would not result in a detrimental encroachment into the countryside, as illustrated within the illustrative plans enclosed in the Vision Document (**Appendix 3**).

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

- 2.66 The site is not located within the setting to 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

- 2.67 The BCCS Issues and Options Report sets out that there is a requirement for the Black Country Authorities to accommodate approximately 22-25,000 new homes. It has been established that the Black Country has severely limited opportunities to accommodate this anticipated growth within the present urban boundaries and it is therefore necessary to consider Green Belt release.

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?

- 2.68 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?

- 2.69 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.
- 2.70 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?

- 2.71 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.
- 2.72 Given the characteristics and viability matters which differ between brownfield and greenfield sites, the BCCS Review should have separate policies for each.

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.

- 2.73 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?

- 2.74 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.
- 2.75 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?

- 2.76 As set out in response to Q2, the infrastructure assessment work to be undertaken by the authorities will be critical to informing what infrastructure will be necessary to unlock new development.
- 2.77 Since the BCCS was adopted it is apparent that it is unviable for some brownfield sites to deliver the necessary infrastructure to assist their delivery (as much is acknowledged at Section 2 of the I&O Report). The four authorities should therefore satisfy themselves that it is viable for new development to contribute towards providing infrastructure to meet their needs, including through Section 106 contributions or the Community Infrastructure Levy, and that any onerous policy requirements in relation to matters such as housing mix or sustainable design features does not comprise viability.
- 2.78 Other tools and interventions should not be relied upon if they have not been confirmed as available to improve infrastructure before the BCCS Review is adopted.

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?

- 2.79 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.
- 2.80 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

- 2.81 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?

- 2.82 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?

2.83 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?

2.84 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.

2.85 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.

2.86 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.

2.87 As demonstrated in the Vision Framework for Land off Birmingham Road (**Appendix 3**) submitted with these representations, health and wellbeing are key principles at the heart of the proposals for the site in Great Barr.

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

2.88 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.

2.89 Given there is a shortfall of 3,039 dwellings against the targets set in the adopted BCCS (a shortfall of 1,396 in Wolverhampton), largely as a result of brownfield sites not being developed due to viability issues, the Review should include a 10% lapse rate should be 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?

2.90 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.

2.91 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.

2.92 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.

2.93 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.

Q50. Do you think that the Core Strategy should continue to set a target for the total employment land stock in Policy EMP1? Yes/No; Please explain why. Do you think that distinguishing between Strategic High Quality Employment Areas and Local Quality Employment Areas is still appropriate? Yes/ No; Please explain why.

2.94 The NPPG sets out that Local Planning Authorities are required to publish information at least annually that shows progress with Local Plan preparation. The Core Strategy should therefore continue to set a target for the total employment land stock to ensure the Annual Monitoring Report can be measured against a specified target.

2.95 Considering there is a surplus in local quality employment land (146ha) and a deficit of 218ha in high quality employment land, the Core Strategy should continue to distinguish between strategic high quality employment areas and local quality employment areas. This distinguished employment land stock should be informed by the evidence base supporting the BCCS Review and as has been undertaken to a certain extent to inform the I&O Report.

Q54. Do you agree that the current approach in Policy EMP4 is no longer fit for purpose and should be amended to reflect a portfolio based approach? Yes/ No. If no, what alternative approaches would you recommend?

2.96 As per our response to Q1, a full review of the BCCS is essential to ensure the plan is prepared in the current planning context, all policies are consistent with national planning policy and it comprises a strategy that will deliver against identified needs.

Policy EMP4 is therefore no longer fit for purpose and should be replaced within the emerging BCCS Review.

- 2.97 Also, as explained in response to Q50, the replacement policy should reflect the nature of different employment sites, in particular highlighting the different types (e.g. strategic high quality or local quality) and the sizes of employment development. This will ensure the Councils are aware of the supply of readily available employment land and the specific characteristics of such, across the Black Country.

Q55. Do you agree with the proposal to retain Policy EMP5? Yes/ No. If no please explain why.

- 2.98 Policy EMP5 seeks to improve access to the labour market and will ultimately present opportunities for creating jobs in new and existing sectors of the economy. The principle of this policy can be utilised and made available to as many existing and future residents as possible. The principle of Policy EMP5 is therefore supported in order to improve job creation in the region.

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. HIMOR are promoting land off Birmingham Road at Great Barr for a high quality development that can combine key attributes of great location, distinctive environment and high design quality.
- 3.4 Sustainable Urban Extensions such as that proposed at Great Barr can play a critical role in meeting the Black Country's anticipated level of housing growth and create a healthy and interactive development that enhances quality of life for new and existing residents. The size and physical characteristics of the site also means that there is potential to accommodate a mixed residential and employment development. The Vision Framework available in **Appendix 3** sets out how employment development could help to deliver a high quality environment that is compatible with and respectful of existing and potential new residential communities.
- 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 Vision Document and Call for Sites form.

Appendix 1: Site Location Plan



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Client
HMOR Group Ltd

Project
Great Barr, Sandwell

Drawing
Site Location Plan

Project No.
HIMU3004

Drawing No. **HIMU3004_1001** Checked by **DC**

Revision **00** Status **Final**

Date **September 2017** Scale **1:2000 @ A2**



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.

X 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.

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.

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

Land off Birmingham Road, Great Barr

18. Site Address

Land off Birmingham Road, Great Barr

19. Postcode

20. Site Area in Hectares

Circa 27 hectare

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

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

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

N/A

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.

Residential only = 700-900 homes
Mixed residential and employment = 300-400 new homes and circa 35,000-40,000 sqm employment space

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
- 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
- Protected species / habitats
- Historic building / landscapes
- X None of these

Please provide supporting details for each constraint identified above.

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

The land is identified within the West Midlands Region Agricultural Classification as 'Other land primarily in non-agricultural use'

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
- X Enquiries received from prospective purchasers / developers
- Site being marketed
- None
- Not known

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

The landowner has been approached by both housebuilders and industrial developers regarding the availability of the site.

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

Residential only = 10 – 12 years

Mixed residential and employment = Residential – 3 – 4 years / Employment = 2 – 3 years

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

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

Yes

X No

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

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

36. 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.

37. Title

38. First Name

39. Last Name

40. Organisation / Company Name

41. Address Line 1*

42. Address Line 2*

43. Address Line 3*

44. Post Code*

45. Email Address*

46. Phone Number*

47. 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: Vision Framework for a Strategic Development Opportunity

Land off Birmingham Road **Great Barr**

Vision framework for a strategic
development opportunity

September 2017

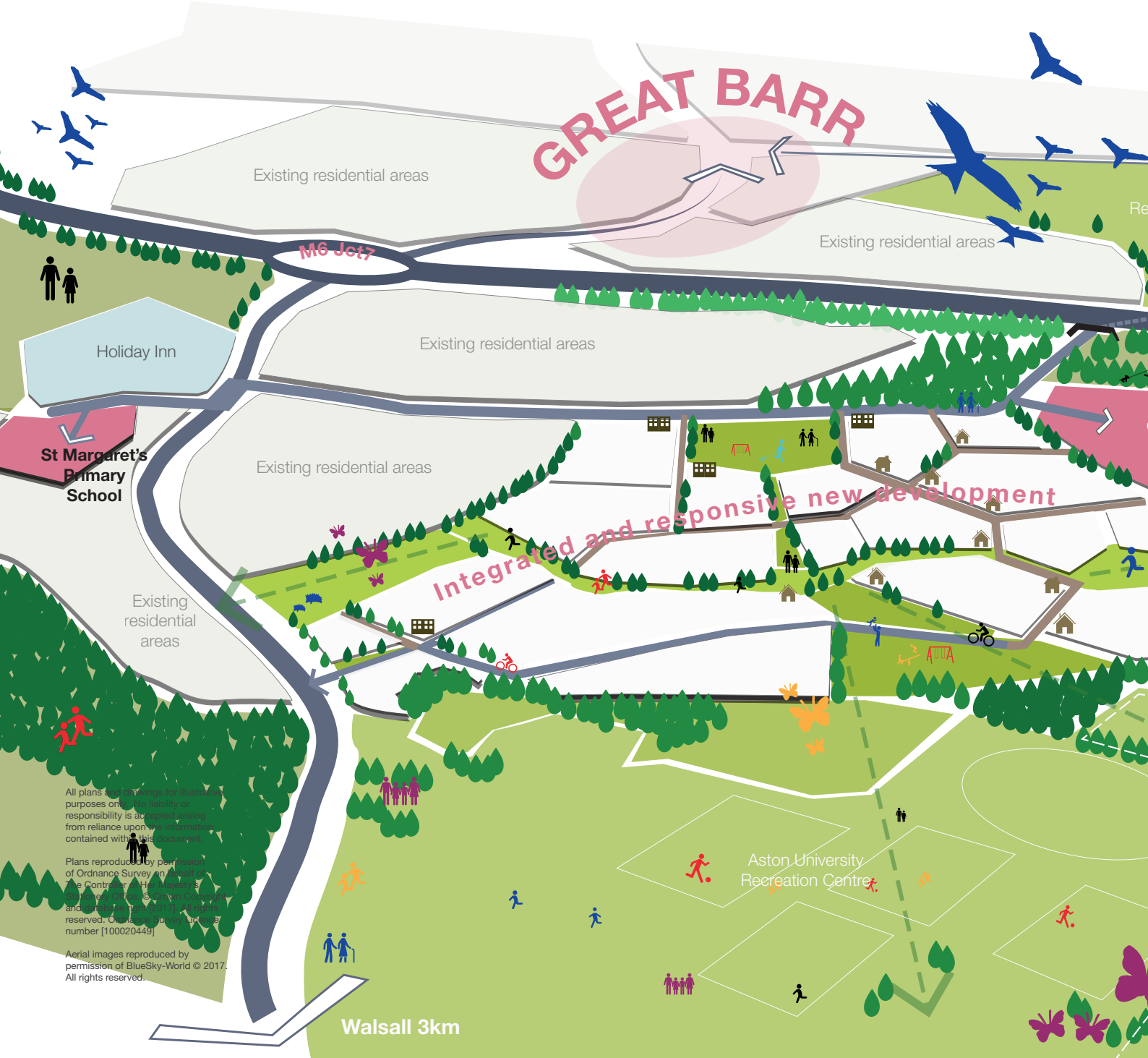


Potential

2 **Land off Birmingham Road at Great Barr provides the foundation for high quality development that can combine key attributes of great location, distinctive environment and high design quality.**

Development here has the potential to enhance the sustainability and accessibility of existing communities and facilities: delivering greater diversity, greater choice and greater sense of place.

This can create a healthy and interactive development that enhances quality of life for new and existing residents.



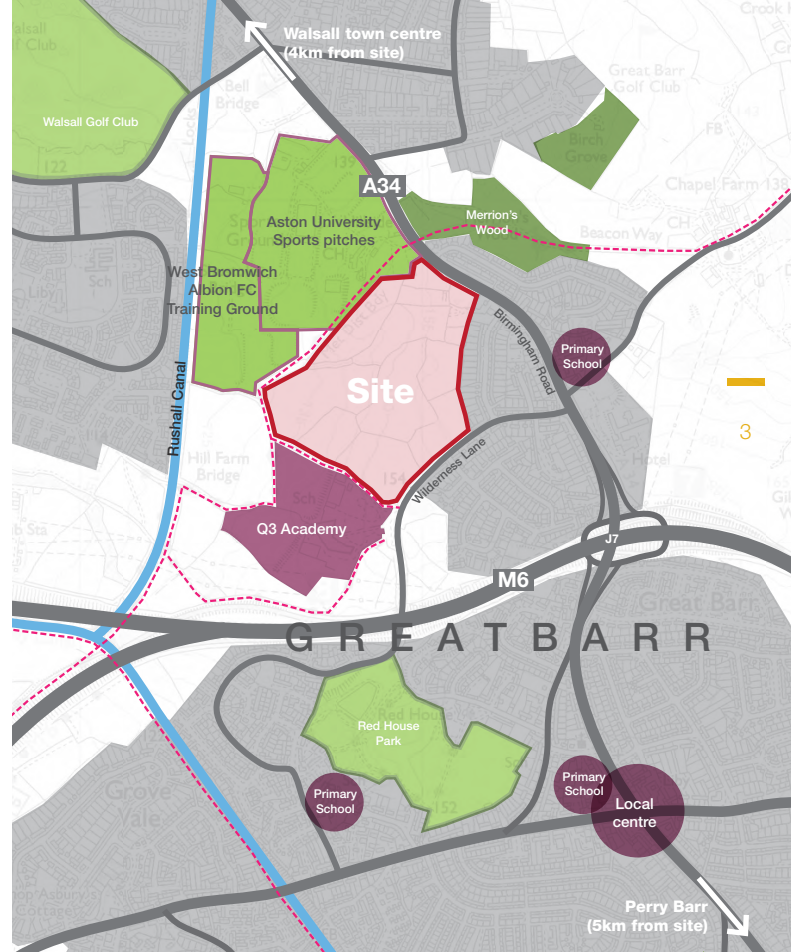
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At approximately 27ha in area, this is a highly flexible site that could deliver mixed use development including both residential and employment - performing roles that meet a variety of needs. The location and scale of development has potential to;

- Make a significant contribution to strategic planning and economic growth ambitions of Sandwell, the Black Country and the wider West Midlands region.
- Meet evidenced housing and/or employment needs.
- Provide a balance between built form and green space assets.
- Enhance access to the Rushall Canal corridor, through to Sandwell Valley Country Park.
- Create new accessible green space.
- Facilitate enhancements to local wildlife value.
- Create and improve links between existing community assets including the Q3 Academy.
- Make use of natural topographic characteristics to shape and enhance local views.



Site location

Delivering on potential

The site sits in an area with immediate access to strong, sustainable and growing infrastructure. A strategic perspective needs to be taken on the value of maintaining the Green Belt status of the site in the long term, against its potential to deliver a sustainable and positive form of development that maximises existing physical and green infrastructure.

A positive and progressive review of Green Belt objectives should not only recognise the changing needs of Sandwell and the wider region, but look at specific opportunities like this site at Birmingham Road to create a distinctive, high quality development in a location that is already integrated into the heart of a major urban conurbation.

This site presents a particularly strong opportunity to balance new development with landscape elements that will respect the valley setting and fully integrate and enhance existing features. Development can be planned to deliver strong green spaces and corridors of high recreational and wildlife value.

HIMOR

HIMOR's track record and expertise provide great confidence that this opportunity can be fully maximised. HIMOR is a privately owned property investment and land promotion company, who are a trusted partner for local authorities seeking major economic developments. We have worked closely with many local authorities to deliver signature developments, including Trafford MBC, Stockport MBC, Wigan MBC, Manchester City Council and the Greater Manchester Combined Authority.

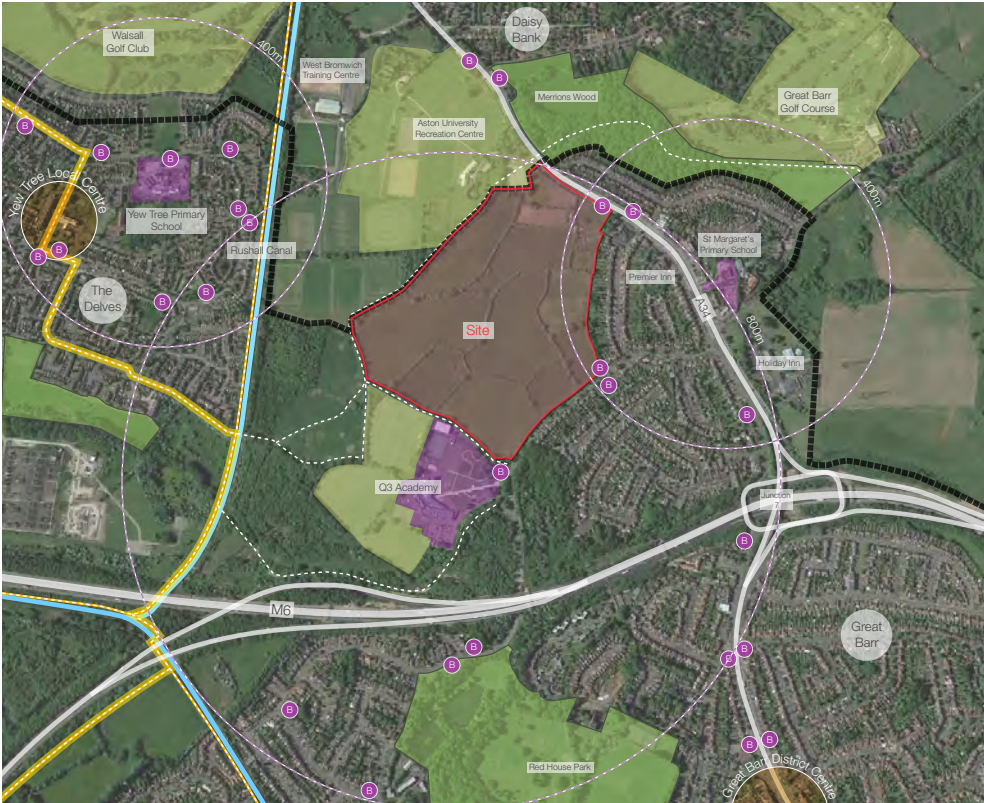
Find out more about HIMOR by visiting www.himor.co.uk

HIMOR 

Site opportunities

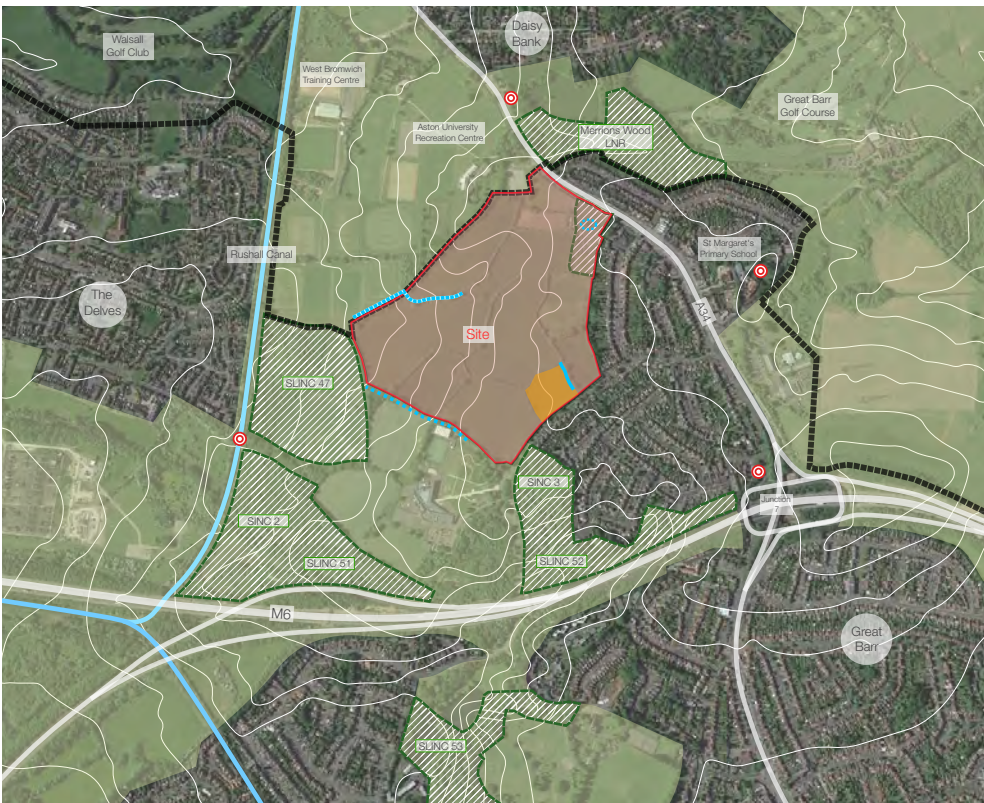
We have undertaken robust assessment of key issues to be considered in formulating a development proposition for the site, and this document is accompanied by a suite of assessment reports which provide in-depth analysis. An overview of selected site and area characteristics is illustrated below.

4 Movement and infrastructure



The site has excellent connectivity in terms of direct access to the strategic highway network, significant local arterial routes and regular bus services. National cycling and walking routes pass immediately adjacent to the site, complementing the local movement network to provide strategic recreational routes into the wider Sandwell Valley. The Q3 Academy provides high quality secondary and 6th Form education, and the site is in close proximity to three primary schools. The diverse local centre of Great Barr lies less than 1.5km to the south.

Environment

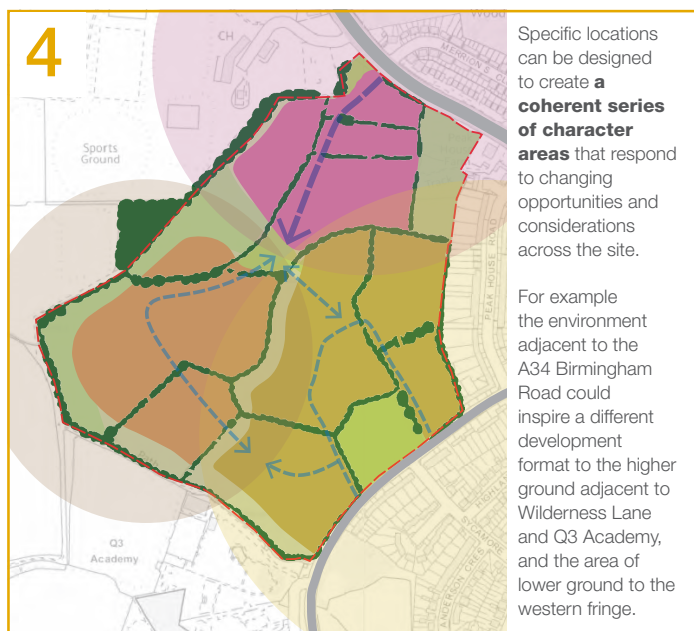
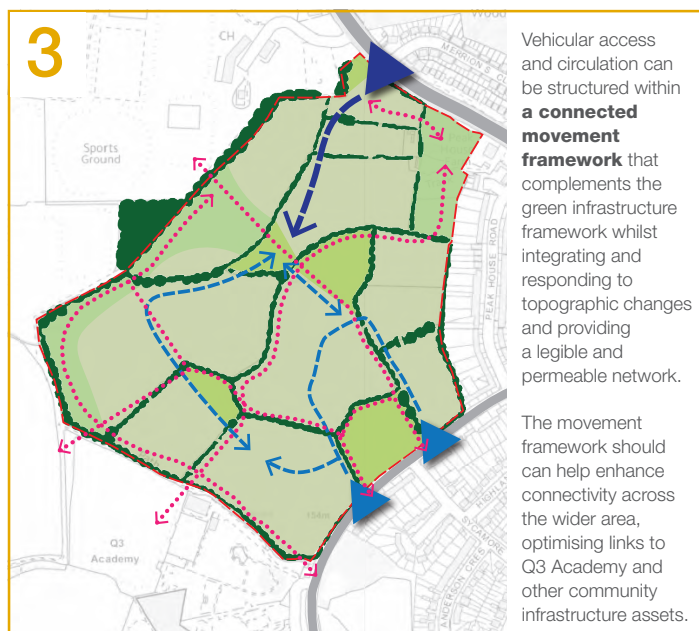
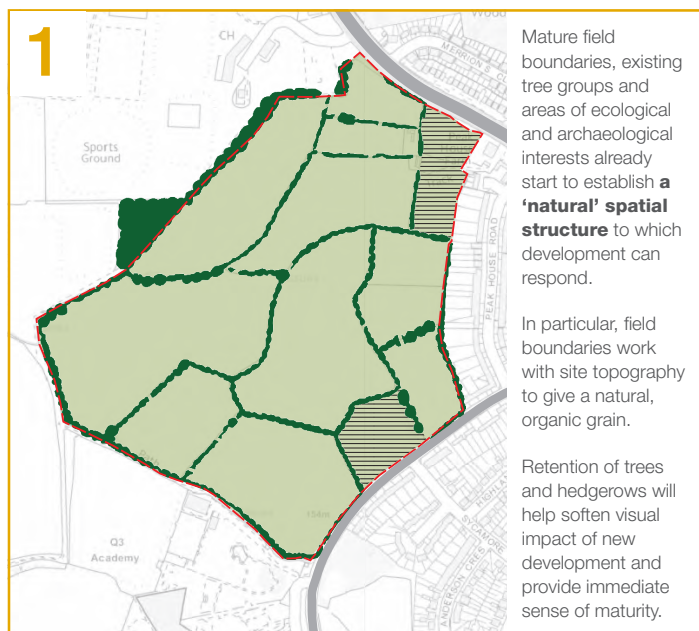


The area has diverse environmental characteristics. This is urbanised Green Belt compartmentalised by activities including the Q3 Academy, Aston University recreation centre and WBA Football Club training ground. There are wildlife assets in the form of local nature reserves (largely clustered to the south adjacent to motorway and Rushall Canal). The land gently slopes towards the west / south west from the ridge of higher ground which is marked by the A34. The A34 is a historic route which although extensively modernised to maximise capacity has some Listed Buildings.

Responsive design approach

Emerging key principles

Existing area and site characteristics can inspire an approach to development that addresses specific constraints and opportunities - a tailored and responsive design approach. In taking the site forward, our objective would be to create a new built environment that is sensitive to and embedded in its context - optimising potential to enhance the local area - but at the same time taking the opportunity to create a distinctive and inspiring place in its own right, providing a high quality, aspirational addition to the area.



Potential approach 1

Mixed residential and employment

- 6 This accessible location, strategically positioned in close proximity to Junction 7 of the M6, means that the site can be seen as an opportunity to deliver a significant employment hub alongside new homes. The size and physical characteristics of the site means that it can naturally accommodate these two uses - high capacity access direct from the A34 opening up the lower lying parts of the site for employment development, with the parts of the site on the higher plateau - accessed from Wilderness Lane - being developed for new homes.





Given the flexibility of the site, employment development could potentially be delivered in different formats and across a range of use classes, but could come together to complement:

- The ambitions of the Sandwell MBC Economic Prospectus
- The success of the Black Country LEP in establishing a strong business hub at the heart of major markets
- The emergence of the WMCA as a driver of economic growth and skills training and as a facilitator of strategic regional planning.

Employment development could help to deliver a high quality environment that is compatible with and respectful of existing and potential new residential communities.

On the basis of initial assumptions on potential net development area, this development approach could yield in the region of 300 - 400 new homes plus approximately 35,000 - 40,000sqm employment space.



Potential approach 2

Residential development

8 The site has clear potential to become the foundation to an attractive, distinctive and connected residential community. Access to the south (Wilderness Road) will enable new homes to become integrated with existing communities and in particular maximise direct links into the Q3 Academy. This would help enhance the role of Wilderness Road as a 'community spine' that connects St Margaret's C and E Primary School in the east with Q3 Academy and Red House Park and Grove Vale Primary School further south.



Residential development could potentially deliver a host of benefits, underpinning the sustainability of local facilities and enhancing the range and mix of the local housing offer. The site has the size and flexibility to accommodate a range of densities and typologies, set within a network of green spaces and with immediate access to distinctive and high quality local landscapes.

On the basis of initial assumptions on potential net development area, this development approach could yield in the region of 700 - 900 new homes.

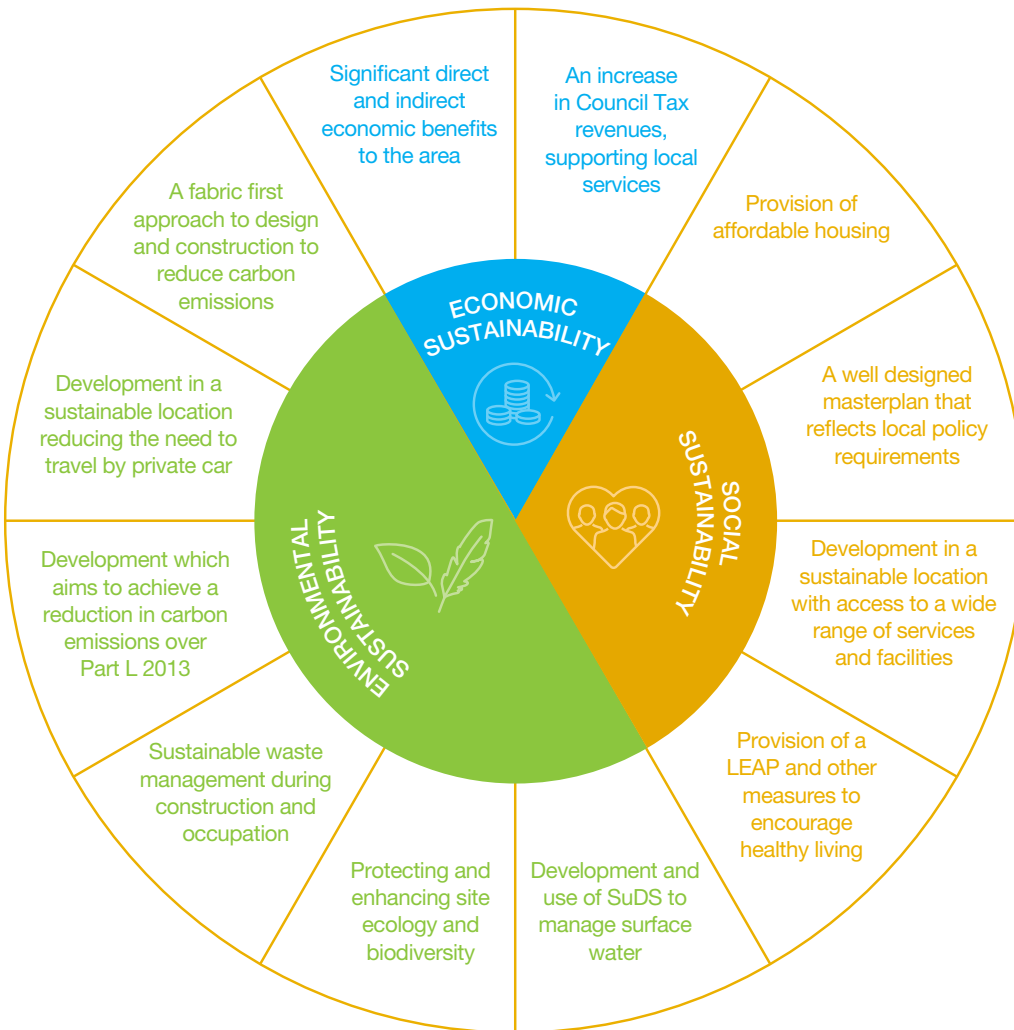


Summary

10 The flexibility of the site will lead to further exploration of development potential, the benefits this could deliver for local communities and contribution made to strategic planning and economic development objectives.

We would welcome the opportunity to work in partnership with Sandwell Council to explore preferred options, in terms of land use mix, landscape structure, open space provision, community infrastructure provision and phasing.

However development is ultimately configured, we believe that this site presents a clear opportunity to make a significant contribution to sustainable development objectives at local, regional and national level.



Immediate access from the A34 Birmingham Road less than 1km from M6, with opportunity for a high quality gateway junction



Wilderness Road enhanced as a key local connection to community infrastructure including Q3 Academy



Opportunities to strengthen a distinctive green infrastructure network and integrate development with existing tree groups





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