

[REDACTED]

From: [REDACTED]
Sent: 08 September 2017 15:05
To: Blackcountrycorestra
Subject: Black Country Core Strategy Review: Issues and Options
Attachments: Black Country Core Strategy IO Letter GDL.pdf



Dear Sir/Madam,

Please find attached a copy of the representation on behalf of Gladman into the above referenced consultation.

I would be grateful if you could confirm receipt.

Kind Regards

[REDACTED] Planning Policy Manager [REDACTED]

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Black Country Core Strategy Review – Issues and Options Consultation

Directors:

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Question 3 : Do you agree that the housing need identified in the Black Country over the period 2014 – 2036 in the SHMA, and the anticipated amount of supply, are appropriate and in line with national guidance?

As referenced above the means by which OAN is calculated is likely to change in the near future, such changes will need to be factored into the OAN requirement as the plan develops. Gladman do support the Councils in their intention to ensure that all of the housing needs of the Black Country are met, and to look to contribute towards the unmet housing needs of Birmingham. It will be essential moving forward that any calculation of OAN is not undertaken in isolation and that the full needs of the sub-region are met moving forward, this may require further joint working and the consideration of even wider strategic plan making.

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

Yes. Given the scale of need for housing and employment land it is inevitable that the Councils will have to undertake Green Belt review to attempt to meet needs. The consultation document confirms in paragraph 3.41 that the Green Belt in the Black Country has not been reviewed, strategically, since it was designated in the 1970s. Whilst Gladman therefore note what the NPPF and Housing White Paper say about the Green Belt it is clear that in this area the time for strategic review is well overdue.

Question 7: Do you think that the Core Strategy vision and sustainability principles remain appropriate?

As referenced in response to question 1, the Core Strategy was prepared pre the adoption of the NPPF. Whilst therefore a number of the principles may remain appropriate others will require reconsideration. For example putting brownfield first may need to be reconsidered in light of the NPPF. Clearly the redevelopment of brownfield sites is important, but the concept of brownfield first is no longer enshrined in national policy.

Question 8: Do you think that the Core Strategy spatial objectives remain appropriate?

No. Gladman consider that the spatial objectives will need to be reconsidered in light of the significant development requirements to which the plan will need to meet. The objectives at present do not place significant enough emphasis on the need to deliver new housing to meet needs, as expressed in both the NPPF and the Housing White Paper.

Question 10: In continuing to promote growth within the Growth Network is there a need to amend the boundaries of the Growth Corridors in the existing Core Strategy?

The question will be best be answered when the plan knows firmly what its development targets are. It seems inevitable that the boundaries of the Growth Corridors, alongside Green Belt release, will be required in order to ensure housing and employment land needs are met.

Question 11A: Do you support Strategic Option 1A? Do you support Strategic option 1B?

It is highly likely that Option 1A will give the Councils the best chance of delivering their housing and employment needs. In reality what is needed is as broad a range of sites, in as broad a range of locations as possible to ensure that all areas of the house building industry can be actively engaged in delivering housing needs. Strategic Option 1A would give a better chance of this being achieved without relying on the potentially challenging need to redevelop existing employment land for housing, which could be challenging in viability terms.

Question 12A: Do you support Strategic Option H1?

Question 13A: Do you support Strategic Option H2?

As highlighted above Gladman consider that the Council will need to consider a mix of the options outlined in H1 and H2. Meeting development targets of the scale proposed will require the largest possible range of sites, attractive to the largest possible range of developers. Concentrating on either small/medium sites or large SUEs in isolation would not allow this to happen.

Question 15: 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?

Yes. The Housing White Paper placed great increased emphasis on the need for HMAs and adjacent HMAs to work constructively and collaboratively to ensure that unmet housing needs are met. It is clear that there are likely capacity issues in the Black Country and pressures from Birmingham with additional unmet housing need. Constructive and effective discussions through the Duty to Cooperate across the West Midlands region will be vital to ensuring housing need is met.

Question 35: Do you support the approach to HLS?

The inclusion of a windfall rate of 505 dwellings per annum is noted, the figure does seem to be high. Any further draft of the plan will need to be accompanied by evidence to justify such a figure in line with the requirements of the NPPF and the PPG. Similarly whilst Gladman note the densification of development in certain areas this will again need to be clearly evidenced and accompanied by market data which allows comfort to be taken that development at the density proposed will be deliverable.

Question 42: Do you agree that the annual affordable housing target should be increased to reflect the 2017 SHMA?

Yes. The Local Authorities should be planning to meet their full OAN for market and affordable housing.

Question 44A: Do you think that the affordable housing requirement for eligible sites in Question 43 should be kept at 25% of the total number of homes on the site?

The affordable percentage of homes on sites should be reflective of the viability of the sites in question. The appropriate percentage can only be derived on the back of a consideration of the overall plan viability which factors in such things as build costs, land values, infrastructure costs and any other associated CIL costs. It may well be that 25% is the correct figure but this will need to be fully evidenced.

Question 111: Do you agree with the proposed change to 'prior extraction' requirements, to maintain a size threshold in urban areas and increase the threshold for green belt sites to 3 ha? If, no what evidence do you have to justify an alternative approach?

No. The Council needs to provide a robust evidence base to justify such an approach which could have a negative or detrimental impact on site delivery. In the first instance policies which require prior extraction need to carefully consider what mineral they are protecting, what quantities of that mineral are already banked and have consent to extract and what level of minerals are required for the future. Whilst the need to consider mineral protection is acknowledged it must be properly weighed against the need for new development, particularly housing and employment land.

Gladman would recommend that should the Council wish to consider a prior extraction approach it should be working actively with land promoters, land owner and land agents throughout the development of the plan in order that any sites which may be allocated on mineral protection areas can have the issues resolved through the plan making process to avoid unnecessary delay. The Council will also need to set out a detailed methodology to allow sites that are not allocated within the plan to be able to provide the necessary information required to consider prior extraction.

I trust the above is helpful in moving the plan forward to the next stage, should you wish to discuss this representation further please do not hesitate to contact me. I would be grateful if Gladman could be kept informed as the plan develops.

Yours sincerely

[Redacted Signature]

Planning Policy Manager

Gladman Developments