

Black Country Core Strategy **'Have your Say' Response Form**

We want your views on the future of the Black Country. This form is to help you to comment on the Black Country Core Strategy Issues and Options Consultation. The document is available on the website at:

www.blackcountrycorestrategy.dudley.gov.uk

How to complete this form: We have set out a number of questions in the Issues and Options document that we would like you to answer. You can answer as many or as few questions as you like. You can also make comments on any other part of the plan or supporting evidence and documents. This form is provided as a single box. If you are making representations of different sections of the Issues and Options document please use a separate box for each question or chapter.

Where possible please submit evidence to support your views. This can range from a personal explanation behind your choice of option, to detailed figures from a piece of published evidence. If you are submitting detailed supporting evidence it would be helpful if you could include the title, author and date of the document(s). Any supporting evidence can be attached to this form or submitted as a separate document.

How to submit your comments: Please complete this form and return it by **5pm 8th September 2017**. Any comments received beyond this date might not be taken into account. This form and any other documents you might wish to provide can be sent by email to blackcountrycorestrategy@dudley.gov.uk or by post to:

Dudley Council
Council House
Priory Road
Dudley
DY1 1HL

If you require this form in an alternative format please contact 01384 814136 or
blackcountrycorestrategy@dudley.gov.uk

Please provide your contact details. Unless you request otherwise your name and comments will be published as part of the consultation process, however your address and contact details will not be made publicly available and will be protected.

Contact Details

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Please place an X in the one box that best describes you / your role in responding to this consultation.

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor	x	Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant	x	Charity	
Land & Property Agent or Surveyor		Duty to co-operate	
Community or other Organisation		Other (please specify in space below)	

Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.

Chapter / Page / Question / Paragraph
See attached Schedule
Do you agree or disagree with the approach set out in the relevant section and / or question?
See Attached Schedule
Comments (continue on a separate sheet if necessary)
See attached Schedule

Black Country Core Strategy Issues and Options Report

“Have Your Say” Response Form

Comments on Behalf of Persimmon Homes West Midlands

Planning Prospects Ltd – August 2017

Chapter / Page / Question / Paragraph: General Comment

Agree / Disagree: N/A

Comments:

Persimmon Homes West Midlands (“Persimmon”) have instructed Planning Prospects Ltd to prepare and submit representations to the Issues and Options Consultation for the Review of the Black Country Core Strategy (BCCS). Persimmon have land ownership and development interests across the BCCS area, and have a successful track record in bringing forward new homes in this part of the West Midlands. These representations are intended to support and promote those interests.

As the BCCS Review progresses it is noted that further opportunities will arise for consultation in September 2018, September 2019, and February 2020, before adoption scheduled for Autumn 2021. Persimmon expect to make a contribution at each of these stages, and as plan preparation moves forward it is anticipated that the comments made will become more detailed, technical and specific in their nature. At the present stage in the process whilst the strategic direction of the BCCS Review is still to be set, detailed policy wording has not been formulated, and certain key elements of the evidence base have yet to be finalised the comments made on behalf of Persimmon are necessarily more strategic and general in their nature. In the main they seek to influence the direction of travel of the BCCS Review, rather than the detailed content. That said, some comments on matters of detail are made where appropriate.

In this context, where a specific question, policy or section of text in the Issues and Options Report is not commented on in these representations this should not be interpreted as meaning that Persimmon necessarily agree (or indeed disagree) with it. Rather, these representations should be understood as a statement of principles, which will be fleshed out where appropriate in subsequent stages of consultation.

The approach taken is to assemble comments together in logical groups relating to individual chapters or questions around specific topics. The representations should be read as a whole to obtain a sense of the trajectory Persimmon consider the Review should follow. The short questionnaire survey (ten questions) has also been completed on behalf of Persimmon, and submitted separately.

However, a note of caution should be exercised at the outset. The Issues and Options Report (for example at paragraph 2.13) is quite positive in its tone with regard to the effectiveness of the adopted BCCS. There have undoubtedly been successes with the implementation of BCCS policy but it must be remembered that over the relevant periods it has failed to deliver the overall targets in terms of new homes, employment land, offices and retail (Issues and Options Report Appendix C). This is not intended as an overt criticism, particularly in light of the challenging economic circumstances within which it has operated. However, it does serve to emphasise quite strongly the importance of ensuring the strategy and policy framework arrived at through the Review is

formulated with great care so as to maximise the opportunity and likelihood for development requirements across all sectors in the Black Country to be met.

Chapter / Page / Question / Paragraph: Question 1 - **Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? Yes/No; If not, what do you think should be the scope of the review?**

Agree / Disagree: Disagree

Comments:

It is considered that a “partial” review of the BCCS should be followed with a considerable degree of caution, if at all. The existing Core Strategy was focused on urban regeneration and accommodating development needs entirely within the urban area, whereas the Review will necessarily adopt a balanced approach across the BCCS area including, crucially, the Green Belt. The existing Core Strategy was adopted in very different circumstances following the financial crisis at the end of the last decade. It catered for different needs, with no requirement to accommodate overspill growth from Birmingham, no certainty as to how employment land requirements would evolve in subsequent years, and different expectations in terms of Midland Metro and HS2. It followed a “Regeneration Corridor” approach which, for reasons expressed elsewhere in these representations, is considered outdated. It has proven challenging to meet development targets set by the existing Core Strategy, and a step change is needed if current and future requirements are to be met.

For all these reasons it is difficult to see how the existing spatial strategy can be retained and “stretched”. The approach cannot be one that seeks to shoehorn the future strategy for the Black Country into a variation of one which, by the time the Review is adopted, will be ten years old. A new strategy is required.

Chapter / Page / Question / Paragraph: Question 2 - **Do you think that the key evidence set out in Table 1 is sufficient to support the key stages of the Core Strategy review? Yes/No; If not, what further evidence is required and, if there are any particular issues that should be taken into account in considering development on any particular sites or in any particular areas, please provide details.**

Agree / Disagree: Disagree

Comments:

The evidence set out in Table 1 is likely to be sufficient to generally support the various stages of the Review, but much depends upon the content and scope of the evidence to be prepared and until certain key documents become available it is not possible to say with certainty that they will indeed prove adequate. In particular, the outcome of the HMA Strategic Growth Study, the Green Belt Review, the second stage Economic Development Needs Assessment (EDNA) are likely to be fundamental in understanding needs and opportunities, and will be central to the nature of comments to be made by Persimmon in subsequent consultations.

To ensure an effective approach the scope of the evidence base documents should be informed by far wider consultation with landowners, developers and employers than appears to have been the case with the first stage exercise. It is considered that the scoping of the Green Belt Review

particularly should be informed by a consultation process, to ensure that the exercise is ultimately completed in the most effective manner.

Chapter / Page / Question / Paragraph: Question 3 - **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? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.**

Agree / Disagree: Disagree

Comments:

Until the HMA Strategic Growth Study is complete it will not be possible to comment on this issue fully, but a considerable degree of caution should be applied to the suggested approach which would see just 3,000 homes from Birmingham's shortfall accommodated in the Black Country. The shortfall of almost 38,000 homes arising from Birmingham's needs that cannot be accommodated within the City is unprecedented, and needs to be addressed with certainty and quickly; it is essential that this housing need is met. It is not clear how the figure of 3,000 homes has been alighted on and is currently described as being "tested", but might be compared with the 3,790 homes which North Warwickshire Borough Council are already seeking to plan for as their contribution to meeting need exported from Birmingham. North Warwickshire is a largely rural authority, with three fifths of its land classified as Green Belt. It is vital that the four Black Country authorities make a full contribution in this regard. They are uniquely placed and well related to Birmingham such to make a significantly more meaningful contribution to support delivery of unmet need from Birmingham. The "testing" of some 3000 dwellings does not appear to be a fair proportion of the overall unmet need, given the scale and relationship of the Black Country to Birmingham.

It will be fundamental to the success of the BCCS Review that this overspill from Birmingham is dealt with quickly, fairly, comprehensively and transparently. The approach is an issue for now, and must be tackled head on at the earliest possible stage.

That said, an approach which balances the contribution that can be made by releasing some surplus employment land for housing, with a significant requirement to release Green Belt land, is supported. This represents a clear shift away from the existing BCCS approach with its almost exclusive urban focus, but one that is necessary if development needs are to be met on viable and deliverable sites.

It is essential that the Review provides for an appropriate level of housing and meets the full housing needs of the sub region. Government policy is advocating a step change in the delivery of new housing and the BCCS Review needs that step change in order to address past under delivery. The National Planning Policy Framework states in respect of housing that "The Government's key housing objective is to increase significantly the delivery of new homes. Everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live. This means:

- increasing the supply of housing
- delivering a wide choice of high quality homes that people want and need
- widening opportunities for home ownership; and

- creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing”.

It goes on to state that “to enable this, the planning system should aim to deliver a sufficient quantity, quality and range of housing”.

There are significant negative impacts which would result from adopting low levels of housing growth and these must be recognised, not least the significant impact on housing affordability and increased house prices by a lack of supply.

A low level of housing growth would not meet housing needs, would not support the economic growth aspirations and could lead to unsustainable patterns of travel with people having to travel further distances between home and work.

New housing development supports and enhances new infrastructure and is a way of providing improvements to local social and community infrastructure which would otherwise be difficult to deliver through public sector means. Government policy seeks to ensure that those communities accommodating new development see directly the benefits in improved infrastructure in their communities.

In terms of the level of growth, it is important to fully consider a number of factors which influence the level of growth to be adopted and these are set out below. It is our submission that they all point to the need for some significant additional housing growth;

Population and Household Projections – A combination of natural population growth, net in migration into the HMA in line with historic trends, together with a general trend towards reduced household sizes and therefore an increase in the number of households suggests that a significant level of growth needs to be planned for. Levels of housing need to positively reflect and balance with aspirations for economic growth and grasp opportunities to meet housing needs for both open market housing and affordable housing. It is essential that the latest and most up to date projections are used to properly understand need.

Affordability – Indications of housing affordability suggest the need for higher levels of housing growth.

Economic Needs – There is a strong and essential need to support economic growth. The delivery of housing supports a vibrant economy. New housebuilding will provide for increased construction activity with both direct and indirect jobs and economic wealth creation. The availability of new quality housing supports business and wider economic activity, promoting the Black Country for inward investment. Housing and economic needs must be aligned to support job targets.

Infrastructure Requirements –The delivery of new housing will support the delivery of required infrastructure through Planning Obligations and CIL. These infrastructure projects are unlikely to be delivered through other public sector initiatives or viably provided through other land uses.

Availability of land – Whilst land is a finite resource and there will be pressure to protect Green Belt, it is essential that new development opportunities are identified that will be viable, deliverable and of suitability to the market. Whilst urban brownfield sites provide an opportunity for some growth, there needs to be some caution in over reliance upon urban regeneration if the under delivery of the past is to be avoided. Reliance is already made on SHLAA opportunities and windfall in order to reduce net need and this again needs some caution given the challenges to delivery of urban

brownfield sites within the Black Country. The Review should more positively plan for a greater reliance upon more market focused, deliverable opportunities which identifiable and supported by evidence of delivery and viability. Land is available including sustainable Green Belt land to meet fully all needs including needs un-met needs from elsewhere in the HMA.

Chapter / Page / Question / Paragraph: Question 4 - **Do you consider the employment land requirement identified for the Black Country up to 2036 in the EDNA is appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.**

Agree / Disagree: Disagree

Comments:

Until the Stage 2 report is completed it is not possible with certainty to comment on whether the requirement is appropriate. That said, and as expressed elsewhere in these representations, for the second stage EDNA to be effective it must be informed by far wider consultation with landowners, developers and employers than appears to have been the case with the first stage exercise. The Stage 1 report appears to have been informed by a narrow range of consultees, and unless this is addressed fully at Stage 2 it is unlikely that the employment land requirement will be properly assessed. It is essential that the Review properly grasps opportunities for economic growth and the Black Country benefits from the prosperity of such growth. The Framework requires LPA's to do all they can to support sustainable economic growth and support the needs of business.

Chapter / Page / Question / Paragraph: Question 5 - **Do you agree with the proposed approach to the Black Country Green Belt Review? Yes/No; If not, what additional work do you think is necessary?**

Agree / Disagree: Disagree

Comments:

It is clear that a comprehensive review of the Green Belt is required. The existing BCCS is characterised by an approach which protects the Green Belt and focuses development on Regeneration Corridors. As acknowledged at paragraph 3.40 of the Issues and Options Report the "exceptional circumstances" threshold for allowing development in the Green Belt has been met with the development needs identified through the Review. Persimmon support the conclusion that exceptional circumstances are in place now to justify review of the Green Belt. The Review of the Green Belt is in fact well overdue, having not taken place since the 1970.'s and particularly given the failings in the delivery of housing and employment growth by the regeneration focus of the strategy of the former BCCS. It is appropriate that this should take place as part of the Core Strategy Review, alongside the Strategic Growth Study, and in conjunction with other neighbouring authorities. However in doing so, it is important that the review is comprehensive and to the fine detail required to properly consider the potential Green Belt merits of individual sites of all scales and sizes. It is essential that being undertaken as part of the Core Strategy, it doesn't merely focus on large scale releases or strategic areas, as a range of Green Belt sites will be require of all sizes if delivery is to be supported throughout the plan period and threat to deliver are avoided.

That said, it is not possible to comment on whether the proposed approach to the Green Belt Review is appropriate or not until the methodology has been identified. As expressed elsewhere in these representations, this exercise is so fundamental to the emerging BCCS that it is essential the scoping of the Green Belt Review should be informed by a consultation process, to ensure it is ultimately completed in the most effective manner.

Chapter / Page / Question / Paragraph: Question 6 - **Do you agree that the key issues set out in Part 3 are the key issues that need to be taken into account through the Core Strategy Review? Yes/No; If not, what other key issues should be taken into account?**

Agree / Disagree: Disagree

Comments:

Broadly, the key issues set out in Part 3 of the Issues and Options Report are the key ones to take into account through the Review, subject to the comments made elsewhere in these representations about dealing fairly, comprehensively and transparently with accommodating the overspill need for homes from Birmingham, and ensuring the Green Belt Review is completed in a comprehensive and most effective manner.

However, as expressed elsewhere in these representations, a further key issue is the need to recognise the shortcomings of the existing BCCS, the extent to which over the relevant periods it has failed to deliver the overall targets in terms of new homes, employment land, offices and retail, and through the Review to ensure the policy framework becomes one which will ensure the development needs of the Black Country are met and opportunities for growth are deliverable and viable and of sufficient interest to the market.

Chapter / Page / Question / Paragraph: Question 7 - **Do you think that the Core Strategy vision and sustainability principles remain appropriate? Yes/No; If not, what alternatives would you suggest?**

Agree / Disagree: Disagree

Comments:

The sustainability principles should be extended to include amongst their number the specific recognition that the Black Country authorities must assist as fully as possible with meeting the overspill development requirements of their neighbours (principally Birmingham).

Reference is made to a brownfield first approach and this needs to be taken with some caution and is not consistent with the requirement of national policy. The Framework advises on an approach which “encourages” the effective use of land by reusing land that has been previously developed, but does not set out a sequential approach. Such priority for brownfield sites has played a significant part in the failing in delivery of the previous BCCS. There needs to be some care in merely carrying forward the previous vision and principles of redevelopment as set out in the previous Plan.

Chapter / Page / Question / Paragraph: Question 8 - **Do you think that the Core Strategy spatial objectives remain appropriate? Yes/No; If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?**

Agree / Disagree: Disagree

Comments:

It is clear that the legacy spatial objectives do not remain relevant and need to be thoroughly re-thought in order to present objectives which are relevant to the challenges today in the context especially of significant needs for housing and the failings of the previous regeneration approach. The spatial objectives are ineffectively framed around a strategy focused almost entirely on directing development towards the Regeneration Corridors. It is very clear that the BCCS Review will need to take a material change in direction and allow for the prospect of significant growth in the Green Belt in a range of locations and of different scales, as part of a balanced approach to accommodating growth. This must be recognised through the spatial objectives. It must acknowledge the requirement to accommodate development in the most sustainable manner and in the most appropriate locations including within the Green Belt.

Chapter / Page / Question / Paragraph: Question 9 - **Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network? Yes/No; If not, what changes do you think should be made to Policies CSP1 and CSP2 in response to new challenges and opportunities?**

Agree / Disagree: Disagree

Comments:

In broad terms the parts of Policy CSP1 dealing with objectives to focus growth within the Strategic Centres are appropriate. However, greater emphasis must be placed on the recognition that this forms one part of a balanced approach to accommodating growth. For the reasons set out elsewhere in these representations it is considered that the Regeneration Corridor approach is no longer appropriate, and should be discontinued.

The implications of this include the requirement for a change of direction for Policy CSP2. This should deal generally with accommodating growth in an even handed and balanced manner outside the Strategic Centres, without reference to the Regeneration Corridors. It will also need to allow for the planned growth required in the Green Belt.

Chapter / Page / Question / Paragraph: Questions 10, 11a, 11b - **In continuing to promote growth within the Growth Network, is there a need to amend the boundaries of any of the Regeneration Corridors in the existing Core Strategy? Yes/No; If so, which boundaries and why?**

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?

Are there any current employment areas that might be considered suitable for redevelopment to housing? Yes/No; Please submit specific sites through the 'call for sites' form.

Agree / Disagree: Disagree

Comments:

The Regeneration Corridors are a dated and artificial construct, and this approach should be discontinued. They are insensitive to market and occupier needs. The approach should be simplified by removing the corridors and accommodating development through carefully identified and allocated sites, with a balanced approach to urban regeneration, redeveloping existing employment land where appropriate, and expanding into the Green Belt. This should be coupled with a straightforward criteria based approach to the development of land that is not allocated. This would be an approach focused very much on the provision of land for development, rather than protecting land or unnecessarily channelling growth. It would seek to optimise urban capacity, broadly defined, whilst also recognising that some development needs can only be met in the Green Belt.

There is no need for a sequential approach to first prioritise the role of the Growth Network and Regeneration Corridors which has failed to deliver in the past.

Green Belt sites will be best provided for on a wide range of smaller sites and some care needs to be taken upon reliance upon large scale urban extensions given the lead in time and challenges to their delivery. In order to address past failings in delivery and boost supply particularly in the short term, a wide range of small to medium size sites need to be identified in the Green Belt as a priority.

Separate submissions are being made on behalf of Persimmon to the "call for sites".

Chapter / Page / Question / Paragraph: Questions 12a, 12b, 13a - **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.**

Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details (please submit specific sites through the 'call for sites' form).

Do you support Spatial Option H2? Yes/No; 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.

Agree / Disagree: Disagree

Comments:

Promoting delivery and market certainty is more likely under Spatial Options H1 and this should be a strong influence in choosing this approach. Persimmon support the view expressed that there is considerable potential for “rounding off” and relatively modest incursions into the Green Belt for small to medium sized housing sites, and the “opportunities” identified in this regard in the table under paragraph 4.29 of the Issues and Options Report should all be recognised. Whilst there is some concern that such small sites may not contribute to infrastructure in significant ways, this is a matter which can be carefully planned for by the LPA’s and cumulative contributions can be combined to support infrastructure provision without compromising CIL regulations.

Whilst there may be some opportunity for a very limited number of Sustainable Urban Extensions it must be a strong influence that the contribution such sites make to housing supply is only likely to be realised in the longer term. They are equally not always certain to make larger infrastructure contributions as they too invariable face viability challenges.

Separate submissions are being made on behalf of Persimmon to the “call for sites”.

Chapter / Page / Question / Paragraph: Question 15a - **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/No; What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?**

Agree / Disagree: Disagree

Comments:

The only circumstances in which any housing growth should be exported elsewhere in the HMA is if there is compelling evidence it cannot be accommodated within the Black Country, and there is a robust and certain framework in place to ensure that the homes will be required. An ongoing and open ended general process of discussion around this issue is unacceptable, as would be any policy in the BCCS Review which relegated it as a problem for another day. It is a problem for now. The export of housing from Birmingham is unprecedented in its scale, and the issue cannot simply continue to be passed down the line. At some point agreement needs to be reached in terms of how need across the HMA is going to be met, and the BCCS Review provides an ideal platform in this regard.

Persimmon do not support any contention at this stage that there is any sound reason why all housing need cannot be accommodated within the Black Country and there is no justification for exporting need to adjoining neighbouring Authorities.

Chapter / Page / Question / Paragraph: Questions 16 - 20

Agree / Disagree: Agree / Disagree

Comments:

A combination of Spatial Options E1 and E2 is appropriate, i.e. expansion into, and new development on, the Green Belt. Large, regular, and unconstrained sites with immediate access to the Strategic Road Network are required to contribute towards meeting the need for employment land, particularly in relation to logistics led requirements. There remains a role for the recycling of

brownfield sites to contribute towards meeting employment land needs, but this will not meet the requirements of the highly location sensitive large space occupiers that the Black Country should be seeking to attract.

It might be that sites within Sustainable Urban Extensions (Spatial Option E3) can also make some contribution in this regard, but this cannot be relied upon, particularly in the short term, and it is unlikely that SUEs will provide an effective mechanism to accommodate large scale requirements. Exporting growth to neighbouring areas (Spatial Option E4) should only be entertained as a last resort and if there is compelling evidence it cannot be accommodated within the Black Country.

This again speaks to the point made elsewhere in these representations that for the second stage EDNA to be effective it must be informed by far wider consultation with landowners, developers and employers than appears to have been the case with the first stage exercise. The Stage 1 report appears to have been informed by a narrow range of consultees, and unless this is addressed fully at Stage 2 it is unlikely that the employment land requirement will be properly assessed.

Chapter / Page / Question / Paragraph: Question 35 - **Do you support the proposed approach to housing land supply? Yes/No; If no, please explain why.**

Agree / Disagree: Disagree

Comments:

The general approach to review HOU1 is of course appropriate, but comments have already been set out above in respect of concerns about adopting a brownfield first approach. Any housing trajectory needs to reflect and support early delivery with a significant shift away from and reduction in the amount of housing to be built on brownfield sites. Any level of need identified, must be met with realistic assumptions about supply. Undue reliance upon windfall merely circumvents the proper planning of an area and reduces certainty. Discounts should be applied for non delivery of commitments and allocations. Some over provision in supply is essential and can ensure a choice and range of sites and greater market interest. Allowances for large scale demolitions as in the past should be removed. Assumptions which increase the expected density of development should also be avoided. There is no meaningful market interest or appetite for increasing the density of housing in the Black Country and delivery would be better supported by reflecting market needs which are focused on sensible and modest density ranges often associated with suburban family housing.

Chapter / Page / Question / Paragraph: Questions 36, 38 and 40 - **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?**

Do you think that the current accessibility and density standards are appropriate for green belt release locations? Yes/No; If no, what standards should be applied in these locations and why?

Do you agree that the 2017 SHMA findings should be used to set general house type targets for the Plan period?

Agree / Disagree: Agree / Disagree

Comments:

The type of approach set out in Policy HOU2 and Table 8 is appropriate in general terms, although greater clarity should be provided to confirm that the standards are general ones, that their practical application is highly location specific, and will be considered on a site by site basis to reflect local circumstances. There should be no requirement to increase the density standards, and again it should be clarified that these (and indeed the accessibility standards) should be regarded as indicative only.

For Green Belt releases, site specific standards should be avoided and density should reflect local circumstances. There should be no separate standards for particular housing types; this would add an unnecessary level of complexity and risk hindering the delivery of such units where they might have been provided as part of schemes otherwise broadly acceptable for their provision.

The SHMA should be used as a general guide to the types of houses to be delivered, but must be applied generally, rather than rigidly, or again this will hinder delivery.

Chapter / Page / Question / Paragraph: Questions 44a and 45 - **Do you think that the affordable housing requirement for eligible sites in Question 43 should be kept at 25% of the total number of homes on the site? Yes /No; Any further comments?**

Should an increased affordable housing requirement be set for green belt release sites, to reflect the likely financial viability of these sites? Yes/No; If yes, what should this be.

Agree / Disagree: Agree / Disagree

Comments:

The affordable housing requirement is appropriate, but on the clear understanding that the provisions of Policy HOU3 in terms of viability testing remain in place. There should be no increased requirement for Green Belt release sites. It is simplistic to assume these sites will have greater financial viability in circumstances where they are likely to have additional costs associated with utilities and infrastructure provision. A target of 25% subject to viability is appropriate.

Chapter / Page / Question / Paragraph: Questions 95a and 95b - **Do you think Garden City principles should be applied in the Black Country? Yes/No; If yes, how should they be applied?**

Should the application of Garden City principles be different for brownfield and greenfield sites? Yes/No; If yes, please explain why.

Agree / Disagree: Disagree

Comments:

Given the particular challenges faced by the Black Country authorities in terms of development viability and attracting investment it is difficult to understand why “Garden City principles” should be pursued. It is of course important to ensure that the best practicable standards of design and environmental infrastructure are achieved, but this can be done within a conventional framework of fairly standard criteria based development management policies, rather than applying an additional, unnecessary and distracting “Garden City” approach.

Chapter / Page / Question / Paragraph: Questions 103a and 103b - **Do you think that Policy ENV7 should be changed to allow increased energy efficiency standards to be accepted in lieu of renewable energy provision for non-domestic buildings? Yes/No; If not, please explain**

Do you think that the 10% requirement should be changed? Yes/No; If yes, please specify what percentage would be more appropriate and to what type of site it should apply.

Agree / Disagree: Agree/Disagree

Comments:

A “fabric first” approach should be supported and encouraged by policy and the 10% requirement for renewables applied and viewed more flexibly. This approach should be applied to housing as well as non domestic buildings