

**Representations to Sandwell Local Plan
Preferred Options Consultation
On behalf of Wain Estates**

December 2023

Turley

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1. Introduction

- 1.1 These representations are submitted on behalf of Wain Estates in response to the Sandwell Local Plan (SLP) Preferred Options (Regulation 18) consultation, running between 6th November and 18th December 2023.
- 1.2 Wain Estates has an extensive track record of promoting land in close partnership with stakeholders and local planning authorities, with over 2,000 acres of land currently being promoted.
- 1.3 Wain Estates have been actively promoting land to the north of Wilderness Lane, Great Barr for a sustainable residential development with associated infrastructure. The site has previously been referred to as “land at Birmingham Road” in previous representations, it also falls under site ref: SA-003-SAN in the Black Country Plan (BCP). Wain Estates are the single landowner for the entire site.
- 1.4 Since the previous representations were submitted, an outline planning application has been prepared and submitted for up to 150 homes, including 40% affordable housing, a countryside park and associated infrastructure on the site (LPA ref: DC/23/68822). It is currently pending determination and demonstrates the intention of the developer to deliver the proposed development and that there are no technical constraints which should preclude its development.
- 1.5 These representations are structured as follows:
 - **Section 2:** Provides a summary of the site and the opportunity it presents.
 - **Section 3:** Sets out our representations to the Issues and Options consultation.
 - **Section 4:** Provides a conclusion to these representations.
- 1.6 A number of appendices are also enclosed with these representations, for completeness and ease of reference.

2. The Opportunity

Historic Site Promotion

- 2.1 Wain Estates (then named HIMOR) first made representations promoting the site to the BCP to the scope, issues, and options consultation (including a call for sites submission) in **September 2017**.
- 2.2 Since then, we have made a further call for sites submission for the BCP in **September 2020**, which included a new Vision Document prepared by FPCR. The submission listed the site as 27ha in size and capable of accommodating 300-355 new homes and new open space. The site was not considered by the Council to be suitable for release from the Green Belt at this time and was not included as an allocation in the draft version of the Black Country Plan.
- 2.3 Further representations were submitted to the BCP Regulation 18 consultations in **October 2021** and **September 2022**. The proposed development quantum has been substantially reduced since this time, work on the preparation of the Black Country Plan has also since ceased in Autumn 2022 and the Black Country authorities are now preparing individual development plans.
- 2.4 Most recently, representations were prepared to the Regulation 18 Issues and Options and further call for sites consultation in **March 2023**, which are enclosed at **Appendix 1**.
- 2.5 At present an application has been submitted for the development of up to 150 homes, including 40% affordable housing, a countryside park and associated infrastructure on the site (LPA ref: DC/23/68822). The application is supported by a full suite of assessments and reports, which can be found on the online application portal on Sandwell's website.

Site Context

- 2.6 The site comprises 27ha of low-grade agricultural land to the north and west of Great Barr. The site is made up of field compartments which are generally irregular in shape and comprise outgrown hedges with some hedgerow trees. There is no woodland on site.
- 2.7 Land north of the site comprises Aston University sports facilities and some areas of scrub and woodland accessed from the A34. There are also a range of buildings and built sports facilities, and the area has a very managed character.
- 2.8 Land east and south of the site comprises residential development, with mainly semidetached and short terraced properties, mostly with sizable gardens. Properties on Peak House Road back onto the site and properties on the southern side of Wilderness Lane, front onto the site.
- 2.9 The Q3 Academy, with a range of academic buildings and sports facilities/ external space lies immediately to the south.

- 2.10 In the immediate area is St. Margaret's C of E Primary School, a petrol filling station, two hotels, a restaurant, the Q3 Academy, and a community hall. There are two bus stops directly adjacent to the site, on Birmingham Road. These stops are served by high frequency bus services, including the 51 route (Walsall to Birmingham via Great Barr and Aston) which has a high frequency of every 10 minutes in the morning and daytime Monday to Friday, and Saturday and Sunday daytime, and a frequency of every 20 minutes on evenings and Saturday morning.
- 2.11 The Site generally descends from approximately 165m in the north east corner, to 130m in the west. A localised valley runs from the south west to north east within the site.
- 2.12 There are no Public Rights of Way (PROW) within the site, although an existing footpath runs past the southern boundary near the Q3 Academy school, and the Beacon Way Long Distance Footpath, runs along the western boundary, within a constrained and unattractive corridor.

Designations

- 2.13 The site does not include any designated heritage assets or any part of such assets. However, there are a number (including several listed buildings) within the site's wider surroundings. The site also includes several features identified in the local archaeological database, holding the potential to meet the definition of "non-designated" heritage assets, as detailed in the NPPG.
- 2.14 The site is not covered by any designation relating to its landscape character or quality, such as AONB.
- 2.15 The site lies fully within Flood zone 1 (lowest level of risk).
- 2.16 The site lies fully within the West Midlands Green Belt.
- 2.17 An area within the western part of the site falls within a Minerals Safeguarding Area (MSA).
- 2.18 The site does not fall within the designation of any site of international nature conservation importance or site within the national site network.
- 2.19 The site does appear to fall within the Peak House Farm Site of Important Nature Conservation (SINC), this represents an 'upgrade and extension' of the previous partial Site of Local Important Nature Conservation (SLINC) designation endorsed by Sandwell's Cabinet on 7 August 2019. This local designation was historically made based on the hedgerow network but through the previous Local Plan process, the scope was expanded to cover the grassland and increasing the designation from a SLINC to a SINC.
- 2.20 As the development plan remains to identify the site as only partially being covered by the SLINC designation, there is some uncertainty as to the status of the SINC designation, although the emerging Sandwell Local Plan does indicate the site will be wholly designated as a SINC. For the purposes of the separately submitted application, it is assumed the SINC designation is being implemented across the entire site.

2.21 None of the above designations are considered to preclude the development of the site, especially with the inclusion of mitigation measures where required.

Current Proposals

2.22 The separate application seeks outline planning permission for the development of a residential scheme at land north of Wilderness Lane, Great Barr.

2.23 The description of the proposed development is as follows:

“Outline planning application (with the exception of access) for the development of up to 150 new dwellings (including 40% affordable housing), a countryside park and associated works.”

2.24 The development comprises the following principal components:

- A total site area of 27ha
- A total net developable area of 3.91ha
- Proposed green infrastructure totalling 23.09ha
- Residential development of up to 150 homes, including 40% affordable (Use Class C3)
- Provision of amenity space in the form of an accessible countryside park
- A children’s play area in the form of a LEAP
- Vehicular, pedestrian and cycle access from Wilderness Lane; and
- Indicative further separate pedestrian/cycle access routes off Birmingham Road which also serve for emergency vehicle access.

2.25 The supporting Development Framework and Illustrative Masterplan can be seen at **Appendix 2 and 3**.

Key Benefits

2.26 The significant benefits of the application are summarised below:

- Meeting the significant and evidenced market housing needs
- Making a substantial contribution to Sandwell’s chronic under supply of affordable housing
- The provision of a new countryside park which will open the site up to the public and create an enhanced green infrastructure network. This will contribute towards achieving an 18.26 % net gain in biodiversity and create newly accessible greenspace for existing and new residents, a very substantial benefit

- Securing the long- term management of the site as a SINC, preventing its degradation, which has been identified since 2020, this should attract significant weight in favour of the proposal.
- Enhancing connectivity in the wider area through provision of new pedestrian and cycle ways, knitting the site into the wider area
- Significant economic benefits during and beyond the construction period which will boost the local economy
- Significant social benefits through the creation of a more balanced housing market, allowing for local people to upgrade or downsize their homes accordingly, and provide access to the housing ladder for first time buyers and those in need of affordable housing
- Significant environmental benefits such as the delivery of a sustainable drainage solution for the site that will manage and mitigate the risk of flooding and climate change, developing a proposal with existing access to sustainable transport modes to access local services and facilities

2.27 As set out previously, further information on the application, its planning merits and justification for development can be found online via the council's application portal using reference (LPA ref: DC/23/68822).

3. Response to the SLP Preferred Options Consultation

- 3.1 We have responded to each question relevant to land north of Wilderness Lane, Great Barr, below.

Vision and Spatial Strategy for Sandwell

- 3.2 Turning to the proposed vision for Sandwell, the second to last paragraph on page 35 of the consultation document, seeks to ensure that by 2041:

*“There is a **wide range of housing available to Sandwell residents, aiming to help meet housing needs, designed to support green living and suitable for adaptation to benefit all sections of the community. Affordable, social, and local authority-provided homes are available to those who need them. New developments are located within attractively landscaped areas, with access to district and low-cost energy and heating projects, sustainable drainage designed to improve the local environment as well as provide reliable protection against flooding and run-off and all necessary services and facilities within walking and cycling distance or a short bus ride away.**”*

- 3.3 Wain Estates support the broad intentions of this part of the vision, with regards to helping to meet the wide range of housing needs within Sandwell, supporting green living and being located in close proximity to local services and facilities via sustainable transport modes. However, within the associated Priorities, Strategic Objectives and Policies set out within Table 3 to support this vision, there is no recognition of the chronic shortage in housing provision to date and how a marked change in strategy will be required to try and address both the historic shortfalls and future demands. Instead, **Objective 6 – Housing to Meet all Needs** is relatively generic and indicates there is no proposed change in approach or strategy for new development, particularly the provision of housing.
- 3.4 Reference is then made to the relevant emerging policies which support the capability to meet this objective and help deliver the vision for Sandwell. Wain Estates are of the view that if these policies are progressed as proposed, they do not provide the capability to meet objective 6 and the provision of housing to meet all needs, including the borough’s chronic shortfall in both affordable and market housing, which is a fundamental part of the proposed vision for Sandwell.
- 3.5 The principle emerging policy which demonstrates this inability to meet the basic housing needs of Sandwell, as established via their own objectively assessed needs (OAN) is **Policy SDS1 – Development Strategy**. This emerging policy proposes to deliver at least 11,167 net new homes over the 2022 -2041 plan period. However, this 11,167 figure is minimal when compared to the identified housing need of 29,773 new homes throughout the same time period, identifying a **shortfall of 18,606 homes**.
- 3.6 As a percentage, the proposed supply in the draft plan represents just **38%** (rounded) of the borough’s total housing needs. This is unacceptable, in both the immediate context

and historic undersupply, but also when looking at the wider national level and Government objectives enshrined within the NPPF, particularly at **paragraph 60** which requires the supply of homes to be “significantly boosted” and importantly that a sufficient amount and variety of land can come forward where it is needed and to ensure the needs of groups with specific housing requirements are addressed. Due to this, difficult decisions need to be made with regards to the proposed spatial strategy, including consideration of Green Belt land release, without which is artificially restricting the development potential within Sandwell.

- 3.7 The starting point of a new Local Plan cannot be the continued chronic under-provision of housing, such that the exist delivery issues will be further exacerbated. As evidenced by the latest Housing Delivery Test Result (2021 measurement, the updated version due for January 2023) – being at just 52%, one of the lowest in the county and automatically evoking the “presumption in favour” and “titled planning balance” when it comes to determining applications. This coupled with the latest Five-Year Housing Land Supply Figures released in October 2023, which have only worsened since the previous year, dropping from 3,092 homes (1.6 years) to 2,850 homes (1.57 years) provides clear evidence that the current spatial strategy is not fit for purpose. This historic underperformance in meeting housing needs, also needs to be viewed within the context of the NPPF’s emphasis on needing to boost the supply of housing, and the clear upward direction of travel of national policy in this respect.
- 3.8 To help address this shortfall, emerging **Policy SH03** Housing Density, Type and Accessibility seeks to provide substantial uplifts to minimum density requirements to maximise on the most efficient use of land. This has resulted in a range from 40dph, to 45dph to 100dph in West Brom, this are much higher than the typical 25-30dph figures. The policy notes that further detailed design requirements will come forward in relation to these densities as part of future Sandwell Design Codes. However, with the growing pressures on development to provide more than just housing, such as the 10% BNG (with onsite provision as a preference), accessibility requirements such as the minimum of 15% provision of part M4(3) dwellings for developments of 10 or more dwellings (emerging **Policy SH05**), the need for sites of 2ha or larger to provide new unrestricted open space at a minimum ratio of 3.63 hectares of space per 1,000 population on site (emerging **Policy SH4W**) all place additional demand for space on site, which may mean that the high minimum density standards cannot be met, resulting in an even lower number of housing units being capable of being provided within Sandwell.
- 3.9 To further help to address the shortfall, Sandwell are proposing to utilise the Duty-to-Cooperate with neighbouring authorities within the same Housing Market Area, or with which Sandwell has a physical or functional relationship. The details of which are to be provided in the Draft Plan Statement of Consultation – which is to be elaborated upon further at the Publication Stage of the plan. This is despite the fact that Birmingham City Council has already said that it does not have enough space to meet its own housing need and might not have enough space to meet its own employment land needs.
- 3.10 Sandwell note that this approach may only address a small proportion of the identified housing shortfall and therefore if this position remains then further work will be undertaken as appropriate to identify how this shortfall can be addressed. This position is reflected in the supporting Sustainability Appraisal (SA) which concludes that,

*“On balance, Option E is identified as the best performing option, assuming that a large proportion of growth under this option would be on previously developed land and within the existing centres, with the benefits in terms of regeneration meaning this option slightly out-performs Option D, although **both would not deliver sufficient housing to satisfy the identified need.**”*

- 3.11 As part of a wider consortium, Wain Estates has instructed the “Falling Even Shorter: an updated review of unmet housing needs in the Greater Birmingham and Black Country Housing Market Area” report (copy enclosed at **Appendix 4**). This report finds that the wider HMA has a shortfall of between 34,742 and 40,676 homes up to 2031, 62,373 homes up to 2036, and 79,737 homes up to 2040 based on each Council’s most up-to-date supply evidence. This shortfall will only be exacerbated by Sandwell’s approach, with other HMA authorities likely to be able to make a very limited contribution to Sandwell’s shortfall.
- 3.12 It therefore is clear that the additional work identified in the SA will be required to meet the housing shortfall, the historic approach to the spatial strategy is being undertaken as part of the emerging local plan, a strategy which was in place for the currently adopted Local Plan, which has resulted in the chronic under delivery of both market and affordable housing.
- 3.13 Wain Estates are of the view that the scale of Sandwell’s own shortfall alone, beyond considering the unmet needs of the wider HMA, amount to exceptional circumstances for reviewing the Green Belt boundaries. This additional work should therefore begin now and a fresh approach to assessing the capacity for housing within the borough should be undertaken, which includes an assessment of Green Belt sites for potential release.
- 3.14 The site on land north of Wilderness Lane is a clear example of the availability of such sites, which are not technically constrained, are in an accessible location, provide the ability to offer enhanced access to the open countryside for recreation purposes and also provide housing in the least sensitive areas of the Green Belt (whilst retaining the majority of it), adjacent to existing built form – in this case situated along Wilderness Lane.
- 3.15 At present, it is concluded that the overall vision and spatial strategy proposed by the emerging SLP would not be effective in meeting the tests for soundness, as set out in **paragraph 35** of the NPPF. In particular, criterion (a) which requires plans to be:

*“Positively prepared – providing a strategy which, **as a minimum, seeks to meet the area’s objectively assessed needs**; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.”*

- 3.16 The council by their own admission have submitted a strategy which falls substantially short of providing a strategy which meets their OAN, which should be seen as a minimum requirement within the extract above. Even in meeting the substantially short figures there is a reliance on maximising out housing densities, in an era where development pressures to deliver supporting features beyond just housing – BNG, sustainability

measures etc often restrict this capability. The duty-to-cooperate is also proposed to be utilised to account for this unmet need, but there is no clear strategy or commitment from neighbouring authorities that this would be achievable in part or as a whole. This is therefore not a sustainable approach to development and will inevitably result in the very purpose of the SLP – being to promote growth in planned manner, falling away, likely resulting in mass speculative development, in order for housing needs to be met.

- 3.17 Wain Estates are of the view that exceptional circumstances for reviewing Sandwell's Green Belt boundaries. A further review of the Green Belt is therefore necessary in order to assess how the boundaries should be amended to maximise the potential for the most sustainable sites.
- 3.18 An example of this is the land north of Wilderness Lane site, for up to 150 homes, 40% affordable housing, a countryside park and associated infrastructure. This application is currently being determined by the LPA (LPA ref: DC/23/68822), demonstrating both developer intention and deliverability to bring the site forward and how cumulative amendments to the Green Belt can form an important and necessary contribution to meeting the current and future housing needs of Sandwell.

Limitations to Housing Provision for Sandwell

- 3.19 Turning more specifically to emerging **Policy SH01** Delivering Sustainable Housing Growth and the elements which make up the proposed housing supply of 11,167 new homes, Wain Estates also have significant concerns regarding the sources which make up this already insufficient number of homes.
- 3.20 Within Table 5 of the above emerging policy, the first source of the housing land supply is made up of sites currently under construction (1,060 homes), with planning permission or prior approval (998 homes) and sites with other commitments (61 homes)¹. Therefore, 2,119 homes included within the figures, are made up of the current supply.
- 3.21 The second source is made up of housing allocations, comprising occupied employment land (2,234 homes), other (3,094 homes), sites with planning permission (1,545 homes) and sites under construction (78 homes). Therefore, 1,623 homes included within the housing allocations are made up of current / existing supply (calculated by adding together sites with existing planning permission and sites under construction). Of the remaining allocations, despite the occupied employment land (2,234 homes) having a 15% discount figure applied, in recognition of the fact that there can be multiple delivery constraints, this in itself does not mean that there is capability of the full 2,234 homes to be delivered given that these sites are in active use for employment.
- 3.22 It has also been demonstrated through the previous Black Country Plan that such approaches are not effective for delivering housing. As part of the Black Country Core Strategy (BCCS) a total of 16,182 homes were allocated on occupied employment land. Based on the Urban Capacity Review Update (May 2021) only 679 (4.2%) of those homes have been delivered to date (with less than five years of the plan period remaining).

¹ 10 units are also included for Gypsy and Traveller pitches, but this element of the supply is not discussed as part of these representations

- 3.23 Furthermore, as recognised in our previous representations, not only is the delivery of housing on such sites questionable, but it also reduces the ability for the Council to provide a sufficient supply of employment sites, of which the Council recognise there are also not enough being provided for as part of the emerging SLP. Paragraph 8.11 of the emerging SLP notes that, 143ha of the employment land need arising in Sandwell cannot be met solely within the Borough, and that the unmet need is to be exported to neighbouring authorities, as part of ongoing duty-to-cooperate work, which is yet to be secured.
- 3.24 It is good practice to ensure that any elements of housing supply included in a council's figures, are suitable, available, and achievable of being viably developed. Wain Estates are of the view that there has not been enough evidence provided for the proposed allocations on occupied employment land, as a robust element of the housing supply.
- 3.25 Taking the above into account, only 3,094 homes (see Table 5 Housing Land Supply Sources within emerging Policy SH01) are allocated which are not made up of existing commitments or situated on occupied employment land, this is a very minor figure when compared to both the proposed delivery of 11,167 net new homes over the plan period and even more so when compared to the actual housing need of 29,773 new homes.
- 3.26 Looking into more detail at some of the proposed allocations, as recognised by the Council when looking at Appendix B of the SLP, they are also not without their constraints and limitations, further demonstrating that the indicative capacity could be further reduced, resulting in an even lower number of housing allocations. For example:
- **SH2 (SA 12)** Land adjacent to Asda, Wolverhampton Road, Oldbury is proposed for 62 homes, but it has access issues which need to be overcome in order to be deliverable, questioning the suitability of this allocation.
 - **SH26 (66)** Lower City Road, Oldbury is proposed for 73 homes but has constraints including land remediation and site assembly issues, there also only appears to be interest from some land owners looking to bring the site forward, so also potential ownership issues to overcome, questioning the suitability and availability of this land to support an allocation.
 - **SH25 (SA 65)** Bradleys Lane / High Street, Tipton proposed for 189 homes however, this site also has site assembly and land contamination issues to be overcome, it also requires the current owners to find a place to relocate their business before development can come forwards, again questioning the suitability and availability of this land to support an allocation.
 - **SM2 SA199** Lion Farm Oldbury, is proposed for a mix of uses, including the provision of 200 homes. However, it relies on relocation of 6 sports pitches to the south of borough, which is arguably not a minor feat. This brings into question the availability and achievability of the land to support an allocation.
 - **SM1 SA 91** Chances Glass Works, is proposed for a mix of uses including 276 homes, this is a heritage led regeneration project given its recognised constraints which are a Grade II listed building, Scheduled Ancient Monument and Galton Valley Conservation Area, the complexity of such a project brings into

question the timescales and the potential delivery of the proposed housing numbers, given the statutory protections given to these heritage constraints, again questioning the suitability and achievability of this site to support an allocation.

3.27 The third part of the housing supply is made up of windfall units, a total of 1,868 are being proposed. However, the delivery of this level of homes is questioned when the restrictive nature of windfall provision within the SLP is assessed. Often and as recognised within the NPPF, the provision of windfall units can help contribute to meeting anticipated housing supply needs, where this aligns with compelling evidence, they can provide a reliable source of supply (**paragraph 71**). Emerging **Policy SH01** Delivering Sustainable Housing Growth, does indeed include for an element of windfall provision – some 1,868 homes over the plan period. However, the delivery of such windfall units will be highly restricted given the limitations placed within emerging **Policy SH02** – Windfall developments. The policy allows for windfall development on previously developed land without exception, but for greenfield sites, windfall development is only allowed subject to certain conditions. These conditions are:

- That the site is not protected as community open space or
- The site is council owned land surplus to requirements or
- The development of the site will bring an under-used piece of land back into beneficial use and will not harm the environmental, ecological, or historic value of the site and the wider area, in accordance with other relevant policies in the SLP

3.28 The justification text to the policy notes that windfall sites are likely to include surplus public land, small non-conforming employment uses and some residential intensification sites where appropriate. However, greenfield sites are only permitted where they conform with the bulleted list above. Such restrictions are overly onerous and severely limit the capability for windfall sites on greenfield land to come forwards. This is also not in conformity with the definition of windfall development contained within the NPPF (Appendix M – Glossary), which simply states that windfall sites are sites not specifically identified in the development plan. Again, placing unnecessary restrictions on the delivery of housing, for a number that is already significantly below the required capacity.

3.29 The fourth part of the housing supply is made up of additional floorspace in centres (219 homes). This element makes up a very small part of the overall proposed supply figures. It demonstrates the limitations that emerge from seeking to maximise land on brownfield sites, and the misconception that such spaces are often not being utilised to the best of their ability.

3.30 Overall, the elements which make up the already under-delivering housing land supply as part of the emerging SLP are seen to be questionable.

- Firstly, there is a large reliance on existing commitments, as sites with planning permission or already under construction to make up the housing numbers.

- Secondly, the level of allocations which are included on occupied employment sites is high and such sites are known to be slow at delivering and riddled with issues which slow down or prevent the development for more vulnerable residential uses, in addition to the fact they will result in a loss of employment floorspace, for which there is a recognised need within the borough.
- Thirdly, the proposed allocations themselves are not without issues to overcome – such as access, site assembly, land ownership and remediation – which are not insubstantial.
- Finally, the overly restrictive nature of the windfall housing policy means there is a severe limit as to where such sites can come forward and on what type of land, despite the NPPF not stipulating such limitations exist.

3.31 In light of the above, Wain Estates are of the view that exceptional circumstances exist in terms of both the scale of unmet need and the likely under delivery of the proposed supply. It is therefore essential that Sandwell reviews its Green Belt boundaries, to ensure it meets its housing needs in the least sensitive locations.

3.32 It is well evidenced that greenfield land will deliver much quicker than brownfield land, where issues of land assembly and remediation severely delay the delivery of housing. It should also be acknowledged that removing land from the Green Belt can also be offset through compensatory improvements to the environmental quality and the accessibility of remaining Green Belt land as well as providing improvements to Green Infrastructure (GI) provision. Overall, the Council must “turn on all taps of supply” if it is to meet its housing needs.

3.33 As emphasised throughout this representation, an example of this is the land north of Wilderness Lane site, for up to 150 homes, a countryside park and enhancements to existing biodiversity and Green Infrastructure within the area. This site is currently being determined by the LPA (LPA ref: DC/23/68822), demonstrating both developer intention and deliverability to bring the site forward and how cumulative amendments to the Green Belt can form an important and necessary contribution to meeting the current and future housing needs of Sandwell.

Limitations to Affordable Housing Provision for Sandwell

3.34 Turning to affordable housing, which is a key issue in terms of the housing supply within the borough, whereby a chronic shortfall has been identified and has historically only worsened. The 25% requirement figure contained within emerging **Policy SH04** represents a 5% increase on the existing requirement, which has not been delivering to the levels expected. This demonstrates that the Council must increase its overall supply, in order to increase the supply of affordable housing.

3.35 Indeed the proposals for land north of Wilderness Lane site include the provision 40% affordable housing, this can viably be done given the site’s greenfield nature. On brownfield sites where additional remediation costs are to be factored into viability considerations, meeting increased and even the basic affordable housing requirements is challenging, demonstrating why Green Belt release of greenfield sites would further

assist in meeting the chronic shortfall in both market and specifically affordable housing needs within Sandwell.

- 3.36 Reference within the policy also notes the aspiration of providing affordable housing through a range of schemes delivering up to 100% funding through grant and other financial sources. However, as reflected in the wording of the policy, this is just that – aspirational. It is likely to be particularly difficult given the already stretched nature of government funding and the lengthy process of applying for such funding.
- 3.37 Wain Estates suggest that further evidence of the delivery of such schemes coming forward or having funding secured needs to be included within the evidence base to support this policy, in order to make it more robust and increase the chances of such developments coming forward.
- 3.38 Appendix 1 of the previous representations submitted (see **Appendix 1** of this document) contains an Affordable Housing Statement which assesses this issue in further detail.

Exceptional Circumstances for Green Belt Release

- 3.39 The purpose of plan-making is to be positively prepared and set out a long term vision for the area, in a way that is aspirational but deliverable (**paragraph 16** of the NPPF). A plan that only provides for around a third of its housing requirement, using the standard method baseline, cannot possibly meet these purposes or deliver the minimum requirement for housing. This is simply not acceptable and does not represent an effective use of the plan-led system.
- 3.40 Wain Estates consider that the Council’s inability to meet their own housing need in the midst of a housing crisis, is an important factor that constitutes the exceptional circumstances that justify Green Belt release. As this is a housing focused representation, employment needs are not explored in detail, however it is clear from reviewing the proposed plan that it proposes not only significant unmet housing need but also a significant unmet employment need. This will only be exacerbated by the anticipated loss of current employment sites for housing, as identified within emerging **policy SH01** and the 2,234 homes proposed to come forward as allocations on occupied employment land. The adverse consequences of not meeting the basic housing or employment needs, demonstrate the exceptional circumstances which are required to justify Green Belt release.
- 3.41 The approach to Green Belt boundary reviews is set out in the NPPF at **paragraphs 141 and 142**. **Paragraph 141** states that the policy making authority need to “*examine fully all other reasonable options for meeting its identified need for development*” before concluding if exceptional circumstances exist to justify changes to Green Belt boundaries. It then goes on to state account needs to be taken for whether the strategy:

“(a) makes as much use as possible of suitable brownfield sites and underutilised land;

(b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in

minimum density standards in town and city centres and other locations well served by public transport; and

(c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

- 3.42 As discussed previously, all three of these elements have been included within the proposed spatial strategy, however, are not without their own constraints and when combined, still fall woefully short of meeting the minimum requirements of the identified OAN for Sandwell. This alone demonstrates that exceptional circumstances exist for Sandwell to review its Green Belt boundaries. The release of land within the Green Belt needs to be further explored, to allow for plan-led development in the future, particularly when also coupled with the inability to also meet required employment land needs. For this reason, Wain Estates suggest a further review of the Green Belt is undertaken, to identify the most sustainably located sites, in line with **paragraph 142** of the NPPF.
- 3.43 A clear example of such a site is land North of Wilderness Lane, which is currently pending determination for up to 150 new homes, a countryside park, 40% affordable housing provision and associated infrastructure. The accompanying Green Belt Assessment contained within the LVA supporting the application, concludes that the harm to the Green Belt arising from development on the site would be low. Development of the site would maintain the physical and visual separation of the different parts of the wider suburban area and would have a very limited effect on encroachment on the countryside. Spatial and visual openness would be minimally affected. The significant new Wilderness countryside park will provide new public access to local people, and the habitat value of the site will be enhanced. The compensatory improvements to the land remaining in the Green Belt would be significant. Whilst we recognise that the LVA has been produced for the purposes of a planning application, it demonstrates that the contribution of the site to the purposes of the Green Belt is limited, and it is suitable for release and allocation for residential development.

Proposed Amendments to the Green Belt Policy

- 3.44 Emerging **Policy SDS6** provides guidance for the approach to Sandwell’s Green Belt, which will be applied to any development proposed in the Green Belt once the plan is adopted.
- 3.45 Criterion 2 of the policy notes that: *“Sandwell green belt’s nature conservation, landscape, heritage and agricultural value will be protected and enhanced.”* Wain Estates draw issue with this wording, as it implies that the Green Belt is a designation of both environmental and heritage value, this is not the case, it is a spatial designation for which there can also be both environmental and heritage features and designations within it. This type of wording adds confusion to the purposes of the Green Belt and the value placed upon its protection. This is recognised in the supporting text to the policy at paragraph 3.84 which states that:

“While green belt is not itself a reflection of landscape quality or value, large parts of the local green belt are also identified as being of significant historic, environmental and landscape importance.”

3.46 Wain Estates suggest that the policy wording is amended to make clearer the difference between the spatial designation and the purposes of the Green Belt and the distinction between this and environmental and heritage designations, whilst recognising their potential concurrent nature.

3.47 Criterion 3 of the policy states that:

“Opportunities will be taken to improve the value and recreational role of the green belt in Sandwell Valley:

a. through improving safe accessibility for all users;

b. by providing facilities for active and passive recreation (if this preserves the openness of the Green Belt and does not conflict with the purposes of including land within it”

3.48 It must be recognised that in order to improve the value and recreational role of the Green Belt in Sandwell, development will likely need to occur. Land within private ownership is not accessible to the public for these purposes, enhancing access will only come as a compensatory improvement as part of future development proposals through planning applications.

3.49 Providing such improvements would form part of a two-way process of negotiation as part of future planning applications, with the provision of housing potentially acting as an enabler, to allow the council to meet the enhanced recreational role of the Green Belt. This also supports Sandwell’s wider vision, which seeks to increase accessible open spaces, such spaces need to come from somewhere, the Green Belt is a key facilitator for this, however it will not come forward of its own accord.

4. Summary

- 4.1 Since 2017 Wain Estates' has actively promoted land to the north of Wilderness Lane, Great Barr (formerly referred to as "land at Birmingham Road") ('the site') as a sustainable and deliverable opportunity for new homes and associated infrastructure. The entire site is in the ownership of Wain Estates. This has culminated in the preparation and submission of a planning application for up to 150 new homes, 40% affordable housing, a countryside park and associated infrastructure, which is currently being determined by the council (LPA ref: DC/23/68822). This demonstrates the site is suitable, available, and achievable for development, given a proposal has been developed which is technically robust and has the developer backing to progress forward to construction. The specific details are set out in section 2 of this representation.
- 4.2 Section 3 of this statement provides Wain Estates' assessment of the most recent emerging SLP in relation to the tests of soundness set out in **paragraph 35** of the NPPF.
- 4.3 Wain Estates raise substantial concerns about the proposed spatial strategy and wider vision. It is not currently fit for purpose, falling short of meeting the OAN by 18,606 homes and falling foul of **paragraph 35(a)** of the NPPF, which states the strategy must as a minimum meet the OAN, in order to be positively prepared. As a percentage, the proposed supply in the draft plan represents just **38%** (rounded) of the borough's total housing needs, this is not an acceptable approach. Especially when coupled with the fact that the identified employment land needs are also not being met, which will only reduce further with the proposed allocations for 2,234 homes on occupied employment land.
- 4.4 In order to be considered justified in line with criterion **(b) of NPPF paragraph 35**, the spatial strategy must consider reasonable alternatives, based on proportionate evidence. It has been demonstrated that exceptional circumstances exist and the release of Green Belt is necessary to meet housing need and enable development in the most sustainable and least sensitive locations. Instead, the Council has taken a blanket approach to retaining all existing Green Belt boundaries, which is artificially restricting their housing land supply, despite sites such as land north of Wilderness Lane, being suitable, available, and achievable for development – evidenced by the recent application submission as discussed previously. Without this further assessment, the SLP cannot be considered justified in the context of **paragraph 35**.
- 4.5 The spatial strategy proposes to utilise the Duty-to-Cooperate in order to address the 18,606 home shortfall, with neighbouring authorities within the same Housing Market Area, or with which Sandwell has a physical or functional relationship. The details of this are to be provided in the Draft Plan Statement of Consultation – which is to be elaborated on further at the Publication Stage of the plan. This is despite the fact that Birmingham City Council has already said that it does not have enough space to meet its own housing need and might not have enough space to meet its own employment land needs. This is not an effective approach at this time, without the evidence or statement of common ground to secure it, the spatial strategy does not align with criterion (c) of **paragraph 35** of the NPPF.

- 4.6 The spatial strategy, windfall and Green Belt polices have been assessed in the context of the NPPF and are seen to be overly onerous and not consistent, they do not contribute to meeting the minimum OAN requirement or the government objective of “significantly boosting” the supply of housing, falling foul of criterion (d) of **paragraph 35** of the NPPF.
- 4.7 Therefore, in its current form, Wain Estates have concluded that the plan is unsound and requires extensive further work and evidence to be undertaken to get it to a place where it can reasonably be submitted for the next Regulation 19 stage of consultation and subsequent submission to the SoS for examination.
- 4.8 Wain Estates would welcome the opportunity to discuss further with officers the site’s potential to assist the Sandwell Local Plan proposed supply.

Appendix 1: Representations to Sandwell Local
Plan Issues and Options, and Call for
Sites Submission (March 2023)

Representations to Sandwell Local Plan Issues and Options consultation, and Call for Sites Submission

On behalf of Wain Estates

March 2023

Turley

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10 Mar 2023

1. Introduction

- 1.1 These representations are submitted on behalf of Wain Estates in response to the Sandwell Local Plan (SLP) Issues and Options (February 2023) (regulation 18) consultation and the call for sites.
- 1.2 Wain Estates is actively promoting land at Birmingham Road, Great Barr (previously site ref: SA-003-SAN in the Black Country Plan (BCP)) as a sustainable and deliverable opportunity for new homes and associated infrastructure. The entire site is in the ownership of Wain Estates.
- 1.3 Wain Estates has an extensive track record of promoting land in close partnership with stakeholders and local planning authorities, with over 2,500 acres of land currently being promoted.
- 1.4 These representations are structured as follows:
 - **Section 2:** Provides a summary of the site and the opportunity it presents.
 - **Section 3:** Sets out our representations to the Issues and Options consultation.
 - **Section 4:** Provides a conclusion to these representations.
- 1.5 A number of appendices are enclosed with these representations, as summarised at paragraph 2.10.

2. The opportunity

Site context

- 2.1 The site is an area of low grade agricultural land, to the north and west of Great Barr and is located within the Greater Birmingham Green Belt. The site is made up of field compartments which are generally irregular in shape and comprise outgrown hedges with some hedgerow trees. There is no woodland on site, though some blocks of trees lie immediately to the north within the grounds of the Aston University sports facilities.
- 2.2 Land north of the site comprises Aston University sports facilities and some areas of scrub and woodland accessed from the A34. There are also a range of buildings and built sports facilities, and the area has a very managed character.
- 2.3 Land east and south of the site comprises residential development, with mainly semi-detached and short terraced properties, mostly with sizable gardens. Properties on Peak House Road back onto the site and properties on the southern side of Wilderness Lane, front onto the site.
- 2.4 The Q3 Academy, with a range of academic buildings and sports facilities/ external space lies immediately to the south.

Historic site promotion

- 2.5 Wain Estates (then named HIMOR) first made representations promoting the site to the BCP to the scope, issues and options consultation (including a call for sites submission) in **September 2017**.
- 2.6 Since then we have made a further call for sites submission in **September 2020**, which included a new Vision Document prepared by FPCR. That document was updated following further technical input for these representations and is enclosed at **Appendix 6** of these representations.
- 2.7 Furthermore, we submitted representations to the BCP Regulation 18 consultations in **October 2021** and **September 2022**.

Current proposals

- 2.8 The Vision Document (**Appendix 6**) presents two separate options for development at the site, which are summarised below:
 - **Option 1** – circa 250 dwellings focused to south of the site (representing 27% of the total area of the site), a new 5.2ha country park with potential for the Beacon Way long distance path to be re-routed, and the north east extent to remain agricultural land. Access will be taken from Wilderness Lane only.
 - **Option 2** – this comprises Option 1 with additional development parcels to the north of Peak House Road. It proposes circa 345 dwellings and a larger 9.8ha country park. It also includes land for a potential SPRINT park and ride facility

which we have previously had positive discussions with the West Midlands Combined Authority (WMCA) regarding. Access is taken from both Wilderness Land and Birmingham Road, to enable provision of a park and ride facility and potential through route for buses.

- 2.9 Both options include the potential provision of a healthcare facility, subject to its need being demonstrated.
- 2.10 Either option will require a limited amount of land to be removed from the Green Belt, as demonstrated in the FPCR Green Belt Review to deliver much needed new homes, whilst opening up what is currently inaccessible land to the public through the provision of a new substantial country park for new and existing residents. The park will be developed along ecological principles with retained and enhanced habitats, and provide sustainable outdoor recreation opportunities.
- 2.11 These proposals can be delivered whilst protecting and enhancing the environment, biodiversity and pedestrian accessibility, as demonstrated by the Vision Document. Given the surrounding environment our proposals for the site are capable of linking into the wider green infrastructure network for the area and delivering a net gain in biodiversity as well as real public benefits.

Site specific evidence base

- 2.12 Throughout these representations we will make reference to a series of site specific evidence base documents which have been prepared by Wain Estates' consultants to support the promotion of the site and inform the preparation of the illustrative masterplan and vision document. Wain Estates' site specific evidence base is summarised below:

Report	Consultant	Appendix No.
Affordable Housing Statement (July 2020)	Tetlow King	1
Site specific Green Belt Review (September 2021)	FPCR	2
Heritage Technical Note (September 2021)	Lanpro	3
Transport Technical Note (September 2021)	PJA	4
Biodiversity Technical Note (October 2021)	Ecology Solutions	5
Vision Document (October 2021)	FPCR	6
Technical Review of Housing Need and Supply in the Black County (October 2021)	Turley	7

Benefits of our proposals

2.13 The significant benefits of Wain Estates' proposals are summarised below:

- Meet significant evidenced housing needs (including a greater shortfall of housing supply, which we discuss further at Section 3 of these representations).
- Make a substantial contribution to Sandwell's chronic under supply of affordable housing.
- Achieving sustainable development in accordance with Paragraphs 8 and 11 of the National Planning Policy Framework (July 2021) (NPPF). The proposals will deliver housing in a highly sustainable location, adjacent to the A34 SPRINT route (which is under construction).
- The proposals are capable of including the provision of a health centre, subject to the need being evidenced.
- The proposals will enhance connectivity in the wider area through the provision of new pedestrian and cycle ways, knitting the site into the wider area.
- They will retain and enhance existing tree and hedgerow provision throughout the site.
- A new green infrastructure network will be delivered, including a country park to the north and attractive green spaces and connections throughout the site. This will contribute to achieving a net gain in biodiversity and create newly accessible green space for existing and new residents and will contribute to any necessary Green Belt compensatory measures, whilst creating a new defensible Green Belt boundary.
- It will provide significant economic benefits, over and above the construction and occupation of the site, which will boost the local economy.
- The proposals can potentially provide a park and ride facility to assist in the delivery of SPRINT and moving people from cars to public transport.
- Delivery of sustainable drainage solutions for the site that will manage and mitigate the risk of flooding and climate change.

3. Response to SLP issues and options consultation

3.1 We respond to each question relevant to Wain Estates' site at Birmingham Road, Great Barr in turn, below.

Q1. Vision and objectives

What do you think are main issues the new SLP should address?

- 3.2 The main issue which the SLP should prioritise addressing is the Borough's chronic under-delivery of both market and affordable homes, as demonstrated by the following:
- The Borough's Housing Delivery Test score for 2021 was **52%**, one of the worst scores across the country.
 - The most recent five year housing land supply position for the Borough (as per the Strategic Housing Land Availability Assessment 2020/21) is **1.6 years** based on the Council's own evidence, well below the required five years.
 - Tetlow King's Affordable Housing Statement (July 2020) (**Appendix 1**) demonstrates that between 2004/05 and 2018/19, despite gross completions of 3,309 affordable homes, there has been a **net reduction in -454 affordable homes** for the same period across the Borough.
- 3.3 As per our responses further below, the SLP must do more than the level of supply proposed by the BCP (the proposed supply in the draft plan represented just **34%** of the Borough's total needs) to address these significant issues, including making difficult decisions regarding releasing Green Belt land to meet these needs.
- 3.4 In seeking to ensure that the SLP addresses the Borough's market and affordable housing needs, the plan must also prioritise ensuring development is proposed in the most sustainable and accessible locations in order to contribute to healthier lifestyles (as per ambition 2 of the issues consultation and NPPF paragraph 105).

Please indicate which option you think should be used for preparing vision?

- Option B: Create a new vision specifically for the Local Plan and the plan period it will cover along the lines of the suggested wording above

- 3.5 Wain Estates support the creation of a specific vision for the SLP (Option B) as the plan should be responding to a long-term, up to date vision which reflects the entire plan period up to 2041. This is also a requirement of NPPF paragraph 22 which states that policies should be set within a vision that looks further ahead (at least 30 years). Any vision should be clear that the plan will address the Borough's chronic affordable housing delivery (as per our response to previous questions).

Do you have any thoughts on the evidence base needed to support the Local Plan Review?

3.6 Wain Estates are supportive in principle of re-using appropriate, up-to-date evidence. The Council should however undertake fresh evidence in terms of assessing sites given the passage of time and in response to the site specific evidence that may have been submitted by landowners and promoters (indeed other Black Country authorities did this as part of the BCP).

3.7 For instance, Wain Estates' own evidence did not support the Council's assessment of their site at Birmingham Road, Great Barr (previously site ref: SA-003-SAN) undertaken as part of the BCP, as summarised below:

- The Green Belt Review assessed the entirety of Wain Estates' land ownership, scoring it 'High' harm. When a reduced area is assessed based on the actual proposed development area (based on either options 1 or 2), development at the site scores a much reduced '**Low-Medium**' harm.
- As demonstrated by the Ecology Solutions Biodiversity Technical Note (**Appendix 5**) and its associated documents, it is clear the biodiversity value of the site has been overplayed and is not justified. Firstly the process for making the Site of Important Nature Conservation (SINC) designation is not transparent and has not been subject to appropriate public consultation or independent scrutiny. Also the status of the designation is not clear as it has not been formalised in any Policies Map. The designations validity is therefore questionable, as is how much weight, if any, can be given to it. Secondly, the assessment of the site undertaken by the Wildlife Trust is seriously flawed, it significantly overplays the site's ecological value. Its findings on the site's ecological value are not evidenced, it over values the grassland habitat, its assessment of naturalness is inaccurate, and it over scores species rarity. We contend that the site's value is lower than that stated in the Assessment and accordingly would not meet the criteria for it being made a SINC. Notwithstanding this, our proposals are capable of preserving the key features of the proposed SINC and existing SLINC, including through the retention and bolstering of existing hedgerows within the site, as well as achieving a net gain in biodiversity. The site should therefore score '**Green**' for ecology.
- Any non-designated archaeological remains at the site will be undeveloped and maintained as part of any development proposals for the site. The historic field pattern will be incorporated into both proposed development options. This would preserve the features which are proposed as justification for designating the site as an Area of High Historic Landscape Value. There is no evidence that there are remains greater than local importance. The site should therefore score '**Green**' for heritage.
- PJA's Transport Technical Note demonstrates that the site is in a much more accessible location than the Site Assessment indicates, for instance the site is located adjacent to the Q3 Academy which is much closer than the Site Assessment acknowledges. There is also the opportunity to provide a health centre.

- At the moment the site is completely inaccessible to the public. Our proposals would deliver significant area of public open space, such as through the provision of a new country park in a location which is not currently accessible to the public. This is a significant benefit.

3.8 The Council should therefore carefully consider which parts of the evidence base may need a refresh, particularly given the Borough’s chronic housing pressures.

Should the local plan:

- plan for a minimum necessary to help meet needs of our population?

3.9 NPPF paragraph 11 is clear that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses and paragraph 35 states that for a plan to be positively prepared it must, as a minimum, seek to meet the area’s objectively assessed needs.

3.10 To do this the Council will need to make difficult decisions in terms of reviewing and amending Green Belt boundaries to meet their needs, as per our response to previous questions.

Do you think the SLP should be valid until 2041 or should it run for longer?

3.11 NPPF paragraph 22 requires strategic policies in local plans to look ahead to a minimum of 15 years post adoption. The Local Development Scheme (November 2022) demonstrates that this plan period can be achieved on the basis the plan is adopted in 2026. However, should the plan be delayed in the coming years, then the end date for the plan period would need to be extended accordingly to maintain a 15 year plan period post adoption.

What are your thoughts on the draft objectives?

3.12 Wain Estates welcome the wide ranging objectives which are proposed to underpin the SLP. In order to plan and deliver on these objectives the Borough must ensure sufficient sites are proposed for allocation to realise real benefits for the Borough’s residents. In doing so would contribute to multiple objectives, such as improving affordable housing delivery, delivering an appropriate mix of homes, delivering more green spaces and provision of other associated infrastructure.

Q3. Climate change

How should we address the climate change in the Local Plan Review– what should be our priority or priorities?

3.13 Climate change requires a multifaceted approach, and therefore priorities cannot be viewed in isolation. In response SMBC will require a strategy that comprises a combination of options to tackle climate change. It is critical that the SLP focuses upon reducing the need for using private cars for short journeys, whilst also promoting alternative means of sustainable travel (this is also emphasised by NPPF paragraph 124). In doing so, the council will need to identify sites to deliver growth in the most sustainable locations. Wain Estates’ site at Birmingham Road, Great Barr is an example of a site that should be identified for growth given its position along a SPRINT line (with bus stops for the SPRINT line immediately adjacent to the site) and the proposed

provision of significant open space which will benefit both existing and new residents by opening up land which is not currently accessible to the public.

Should the new plan leave the issue of carbon reduction in new buildings to other relevant legislation rather than making its own provision?

- 3.14 The plan should make sure it does not repeat the requirements of Building Regulations and should instead aim to complement them in order for the plan to be found sound (NPPF paragraph 35).

Q7. Future development in Sandwell

What do you think are the main challenges we face in planning for housing and employment in Sandwell between now and 2041?

- 3.15 The main challenge would be identifying sites that, **as a minimum**, seek to meet the borough's objectively assessed needs as required by paragraph 35 of the NPPF. As we have set out in response to the previous questions, Sandwell's current market and affordable housing delivery is failing as per all metrics for measuring it. SMBC will need to proactively plan and make difficult decisions in order to address this challenge and stem the Borough's chronic under delivery. It cannot rely solely on Brownfield land, as per our response further below.
- 3.16 This includes releasing Green Belt land to meet housing needs, such as Wain Estates' site on Birmingham Road, Great Barr, which is in a highly accessible location.

Where do you think this new housing should be built?

- 3.17 In order to address Sandwell's chronic market and affordable housing under supply it will be necessary to 'turn on all the taps of supply', so all four options will be required to contribute, including greenfield sites in the Green Belt.
- 3.18 The Council will **not** be able to solely rely on brownfield land. This strategy has not worked to date, as demonstrated by the Council's five year housing land supply position, Housing Delivery Test score, and net loss of affordable housing provision since 2004. Furthermore, as shown by the Black Country Viability Delivery Study (September 2021) 65% of urban typologies tested are marginally viable (27%) or unviable (38%). Such sites will make no contribution to the Council's affordable housing needs and are unlikely to deliver significant wider infrastructure benefits for the local community.
- 3.19 Notwithstanding that SMBC's proposed supply in the BCP only totalled 34% of the Borough's total needs, the findings of Turley's Technical Review of Housing Need and Supply in the Black County (October 2021) (**Appendix 7**) raised significant concerns regarding the robustness of that supply, as summarised below:
- There are a number of sources of the supply which are proposed on existing vacant or occupied employment land (6% of the total proposed supply). Taking such an approach significantly risks the ability to provide a sufficient supply of employment sites. housing supplies should also only include land with a realistic prospect that it is available and could be viably developed.
 - The above is not a new approach. The Black Country Core Strategy (BCCS) also allocated a total of 16,182 homes on occupied employment land. Based on the

Urban Capacity Review Update (May 2021) only 679 (4.2%) of those homes have been delivered to date (with less than five years of the plan period remaining).

- Sufficient evidence will be necessary if any extant BCCS allocations are to be 'rolled forward' into any SLP. No evidence was provided as part of the BCP.

3.20 It is clear that parts A-B of NPPF paragraph 141 have been satisfied and the Council has exhausted its brownfield supply. The Council should therefore review its own Green Belt to meet its own needs whilst exploring whether neighbouring authorities can take any of its unmet needs.

3.21 The Council will therefore need to maximise all opportunities, including greenfield sites in the Green Belt, such as Wain Estates' site on Birmingham Road, Great Barr.

What sort of new development (homes, workplaces, shops, leisure facilities etc) do you think would help make Sandwell a better place to live by 2041?

3.22 Ensuring new development is in the right places will help make Sandwell a better place to live, including providing opportunities for residents to do to day-to-day activities and get to work without the need to use a car (as per NPPF paragraph 105). This also reflects the Council's wider climate change aspirations. The plan also needs to make sure the right type of development is delivered, including the provision of affordable housing.

3.23 SMBC therefore needs to identify sites that can deliver real benefits for the Borough such as Wain Estates' site at Great Barr, which can offer a policy compliant provision of affordable housing, significant new open space and potentially the delivery of a park and ride facility for the adjacent SPRINT route. These will benefit existing and new residents.

Which of the following issues are most important to you?

3.24 Planning is a balancing act in which all the listed issues are important and need to be viewed together rather than in isolation. The SLP aims through its proposed vision to address climate change and deliver high quality development which meets the needs of its communities. In order to do so, it will be critical that new development is in sustainable locations, adjacent to high frequency public transport links and sufficiently viable to deliver the necessary affordable housing and wider infrastructure.

9. Sustainable Locations

Should most new development:

- **be concentrated in locations with the best levels of sustainable access to jobs, transport, services and facilities?**
- **be spread out between different towns and centres, to help support new growth and investment in those locations currently without a good supply of jobs, transport, services and facilities?**

3.25 As per NPPF paragraph 105 new development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. As reflected on in our answers to Q7 above, the

Council will need to switch on all the taps of supply if it is to **as a minimum**, provide for objectively assessed needs for housing.

Are there any locations in Sandwell you think we should look at in particular to find land for new development?

3.26 Please see **Section 2** of these representations which outlines the opportunity for development and benefits which could be brought forward as part of Wain Estates' Birmingham Road, Great Barr site. It can deliver real benefits for the community including the provision of policy compliant affordable housing, a new country park, and potentially a health centre and park and ride facility.

10. Masterplanning

What sort of development do you think would benefit from having a masterplan?

3.27 All residential schemes would benefit from having a masterplan as there is a need to coordinate development in a comprehensive approach. This allows for the development and phasing of a scheme to be understood on a scheme-wide basis. It is considered that the most simple way for the masterplan of a site to be secured is through the planning application process.

11. Good design

Do you think we should:

- **provide a local design policy / design guidance specifically for Sandwell; or**
- **use the national code and guidance instead?**

3.28 It would be beneficial to provide local design policy and guidance provided that it complements and does not conflict or repeat national design codes. Design requirements which may adversely affect the viability of schemes should be appropriately tested through the Local Plan viability testing process.

Development for health

How should we plan for our ageing population?

3.29 As part of SMBC's evidence collection for the SLP, Sandwell's aging population needs should be assessed and identified and a policy should be included in a draft SLP to ensure any identified need is met.

20. Green and blue infrastructure

Should the SLP take a more positive approach to ensuring green and blue infrastructure and their benefits are maximised in new development?

3.30 In order to achieve the stated objectives and vision of the SLP, both blue and green infrastructure should always be required in new development if the SLP is to truly address climate change. This can be a significant issue for brownfield sites, the Council should therefore consider all opportunities to maximise development.

21. Open space

How should new developments support the provision of high quality open space?

- 3.31 As demonstrated by the proposals for Wain Estates' site at Birmingham Road, Great Barr (**Section 2**) high quality open space is supported by locating development in the right locations. The location of sites in sustainable and accessible locations, on viable sites, aids viability which enables the delivery of significant high quality open space.

39. Transport Infrastructure

Are you aware of any locations where you think new or improved transport infrastructure may be required?

- 3.32 As part of the proposals outlined in **Section 2**, Wain Estates' site in Great Barr could potentially accommodate a park and ride facility for the SPRINT bus service. Wain Estates' would be able to provide land for the park and ride if a need is demonstrated.

46. Biodiversity Net Gain

Do you think the SLP should contain a policy on retaining offsite biodiversity net gain in Sandwell?

- 3.33 In order for a proposed policy on retaining offsite biodiversity net gain in Sandwell to be feasible, the council will need to identify locations that can be used for any off-site contributions. Without identifying locations within Sandwell, there is the risk that off-site contributions are not used and then returned to the developer which undermines the fundamental purpose of biodiversity net gain.

4. Summary

- 4.1 Since 2017 Wain Estates' has actively promoted land at Birmingham Road, Great Barr ('the site') as a sustainable and deliverable opportunity for new homes and associated infrastructure. The entire site is in the ownership of Wain Estates.
- 4.2 As demonstrated throughout **Section 3** of these representations, the SLP should be prepared with a balanced approach towards addressing the Borough's objectively assessed needs. In order to do so, sites should be selected in the right locations that provide sustainable and accessible development which deliver housing that addresses local needs. SMBC now has the opportunity to deliver the needs required up to 2041 which were woefully under written in the Black County Plan.
- 4.3 Therefore as the SLP progresses, SMBC must identify sites to be allocated for new housing to ensure their supply is robust and the shortfall is minimal. Wain Estates' site at Birmingham Road, Great Barr is a sustainable opportunity for contributing to this remaining shortfall:
- The proposals are capable of including the provision of a health centre.
 - The proposals will enhance connectivity in the wider area through the provision of new pedestrian and cycle ways, knitting the site into the wider area.
 - They will retain and enhance existing tree and hedgerow provision throughout the site.
 - A new green infrastructure network will be delivered, including a significant country park to the north and attractive green spaces and connections throughout the site. This will contribute to achieving a net gain in biodiversity.
 - These proposals will also create newly accessible green space for existing and new residents (the site is currently wholly inaccessible to the public) and will contribute to any necessary Green Belt compensatory measures, whilst creating a new defensible Green Belt boundary.
 - It will provide significant economic benefits, over and above the construction and occupation of the site, which will boost the local economy.
 - The proposals can potentially provide a park and ride facility to assist in the delivery of SPRINT and moving people from cars to public transport.
 - The proposals will make a significant contribution to Sandwell's chronic affordable housing shortfall.
 - Delivery of sustainable drainage solutions for the site that will manage and mitigate the risk of flooding and climate change.
 - Our proposals for the site will have no adverse impacts on the local or wider highway network.

- 4.4 As we set out at **Section 2**, land at Birmingham Road, Great Barr is a sustainable and accessible site which can contribute to Sandwell's chronic market and affordable housing needs, and can provide real benefits for the community. Any future evidence base for the Local Plan should assess the area of the site proposed for development, as a significant proportion of the site is proposed to be a country park and open space.
- 4.5 We would welcome the opportunity to discuss further with officers the site's potential to assist the Sandwell Local Plan proposed supply.

Appendix 1: Affordable Housing Statement (July 2020)

Affordable Housing Statement

Land off Birmingham Road, Great Barr

Affordable Housing Statement

Land off Birmingham Road, Great Barr

HIMOR

July 2020

OUR REF: M20/0306-01.RPT

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Executive Summary

- i. Sandwell is undoubtedly an area of acute affordable housing needs. Evidence presented by Tetlow King Planning demonstrates that affordable housing delivery has been wiped out by deductions to the affordable housing stock, thereby resulting in unprecedented circumstances warranting the identification and allocation of sufficiently large enough sites to provide a high level of affordable housing.
- ii. The Development Plan for Sandwell comprises the Black Country Core Strategy (2011), the Site Allocations and Delivery Development Plan Document (DPD) (2012),
- iii. Other material considerations include the National Planning Policy Framework (NPPF) (2019), the Planning Practice Guidance, the emerging Black Country Core Strategy Plan Review (2019) and a range of corporate documents produced by the Council.
- iv. Core Strategy Policy HOU3: Delivering Affordable Housing, identifies a target of a minimum of 11,000 new affordable homes between 2006 and 2026 across the Housing Market Area (HMA). It seeks 25% affordable housing on sites of 15 or more units. Of this HMA target, 3,933 are within Sandwell, which equates to an average of 196 affordable homes per annum.
- v. There are a wide range of Sandwell Council documents that clearly highlight the need for more affordable housing within the authority area to address the existing housing issues within Sandwell. In addition to which the delivery of affordable homes has been a long-standing corporate priority of the Council.
- vi. The most recent assessment of affordable housing needs across the HMA is contained within the Black Country and South Staffordshire Strategic Housing Market Assessment (2017). This identifies an annual need for 244 net affordable homes in Sandwell and applies the Liverpool approach to backlog between 2011 and 2031.
- vii. In Sandwell across the 15 year period between 2004/05 and 2018/19, despite gross completions of 3,309 affordable homes, the volume of stock lost through Right to Buy has resulting in a net reduction of -454 affordable homes across this period.
- viii. The impact of the Right to Buy sales is devastating the ability of the Council to house its residents in need and for the residents on the housing register to have their housing need met. This is a problem observed across the Black Country authorities.

- ix. In relation to identified needs within the SHMA, comparing affordable housing delivery since 2011 (the base period of the 2017 SHMA) it can be seen that there has been a net gain of just 4 affordable homes once Right to Buy has been accounted for. This is an enormous shortfall of -1,948 affordable homes when compared to a net need for 1,952 over the same period. The Council have fallen 99% short of meeting identified net affordable housing needs.
- x. In the experience of Tetlow King Planning such under provision is virtually unparalleled in England. There can be no doubt this council is failing to achieve sufficient additions to the stock of affordable housing.
- xi. Market signals indicate that:
 - a. The average value of a house in Sandwell is £150,603, up £32,120 since 2013.
 - b. The median house price to income ratio within Sandwell has increased more than threefold since 1997 from £42,000 to £150,000 and now stands at its highest level since records began
 - c. Average monthly rents stand at £561, rising from £510 in 2015/16, equivalent to an additional £51 per month in only three years.
 - d. Lower quartile house prices in relation to lower quartile incomes in Sandwell have risen dramatically since the turn of the millennium, more than doubling from a ratio of 2.72 in 2000 to 6.05 in 2019.
 - e. At 1 April 2019 there were a total of 2,935 households on the Sandwell Housing Register. Comparative analysis of the numbers of households on the Register compared to the net additions to affordable housing stock and illustrates that net additions to stock have persistently fallen significantly short of coming anywhere near addressing identified needs on the Housing Register.
 - f. The recent data available is MHCLG's 'initial assessments of statutory homelessness duties owed' which showed that for the period up to September 2019, there were 141 households owed a duty. These are real people, in real need, now.
 - g. The private rented sector, even at entry level, has higher rents than those in the social rented or affordable rented sector. In the past six years alone there has been an 18% increase in monthly private rental costs.

- h. In the 2018/19 monitoring period, Registered Provider rents for the authority area were £392¹ pcm. This is some £108 pcm more affordable than the average lower quartile private rental costs.
- xii. These all indicate a worsening trend in affordability in Sandwell as a result of which a step change in affordable housing delivery is required to address identified needs and begin to address the significant shortfall in delivery compared to objectively assessed affordable housing needs.
- xiii. In light of the Council's past performance, the level of identified need and the worsening affordable housing indicators there is no doubt that sites such as this are absolutely necessary to address the affordable housing needs of Sandwell.

¹ Based upon multiplying MHCLG weekly rental data taken from Live Table 704 by 4.4 to represent monthly rental costs

Introduction

Section 1

- 1.1 **Tetlow King Planning** are instructed by **HIMOR** to prepare an Affordable Housing Statement in support of their proposals for land off Birmingham Road, Great Barr, Sandwell.
- 1.2 This Statement includes an assessment of relevant Development Plan policies, other material considerations and other guidance relevant to the site and the proposed development. It also defines the affordable housing needs that would be met by the proposed development, analysis of the past delivery rate of affordable housing in Sandwell and an assessment of affordability indicators.
- 1.3 Freedom of Information requests on housing matters were made on 19 March 2020 and 23 March 2020 to the four Black Country local authorities². This data (reproduced at **Appendix 1**) provides useful context when considering the Black Country area as a whole and is referred to in this report as appropriate.
- 1.4 This report comprises the following three sections:
 - Section 2 defines the planning policy framework in the form of the Development Plan and other material considerations;
 - Section 3 addresses the need for affordable housing in Sandwell and includes an assessment of the Council's past delivery record compared to identified needs; and
 - Section 4 provides an assessment of affordability indicators within Sandwell.

² Dudley, Sandwell, Walsall and Wolverhampton councils

The Development Plan and Other Material Considerations

Section 2

- 2.1 The Development Plan for Sandwell comprises the Black Country Core Strategy (2011), the Site Allocations and Delivery DPD (2012).
- 2.2 Other material considerations include the National Planning Policy Framework (2019), the Planning Practice Guidance, the emerging Black Country Core Strategy Plan Review (2019) and a range of corporate documents produced by the Council.

The Development Plan

The Black Country Core Strategy (2011)

- 2.3 The adopted Black Country Core Strategy covers the four authority areas of Dudley, Sandwell, Walsall and Wolverhampton and covers the period from 2006 to 2026.
- 2.4 The Core Strategy vision, at paragraph 2.2, under the heading of sustainable communities, is to *“create a network of cohesive, healthy and prosperous communities across the Black Country, with equal access to a mix of affordable and aspirational housing.”*
- 2.5 At paragraph 2.3 the Strategy identifies that the achievement of the vision requires a number of sustainability challenges to be addressed, including *“ensuring that all members of the community have the best possible access to facilities, housing and opportunities.”*
- 2.6 **Policy HOU2: Housing Density, Type and Accessibility**, requires a range of housing types, tenures and densities to meet identified sub regional and local needs and to meet the needs of both existing and future residents.
- 2.7 At **Policy HOU3: Delivering Affordable Housing**, identifies a target of a minimum of 11,000 new affordable homes between 2006 and 2026. It seeks 25% affordable housing on sites of 15 or more units where financially viable. The policy details that the type and tenure of affordable units sought will be based on best available information regarding housing need, site surroundings and viability considerations.

- 2.8 The reasoned justification to the Policy at paragraph 3.14 sets out that *“whilst the current economic situation has impacted on house prices in recent times rising house prices and low average incomes have made market housing increasingly unaffordable for many Black Country households.”*
- 2.9 It goes on to explain that *“the C3 Strategic Housing Market Assessment (SHMA) 2008 identified a significant need for affordable housing in the Black Country up to 2011 amounting to 3,125 units per year”* and that in order *“to meet this level of need over the Plan period 80% of new housing would have to be affordable”*.
- 2.10 Critically paragraph 3.15 details that whilst the RSS Phase 2 Revision suggested a minimum affordable housing target of 29% of gross completions, but goes on to set out that *“this is not achievable in the Black Country as even when residential values were at their peak, it has only been possible to secure, on average, half the target affordable housing”*.
- 2.11 At paragraph 3.19 the Core Strategy sets out that the tenure of affordable housing required over the Plan period will vary according to local housing need and market conditions.
- 2.12 Appendix 4 to the Core Strategy, the housing trajectory, does not provide any information on past delivery nor anticipated future rates of affordable housing delivery.

Sandwell Site Allocations and Delivery Development Plan Document (2012)

- 2.13 Section four covers housing policies at paragraph 4.3 when drawing reference from the Sandwell Housing Needs and Demands Study Refresh (2010) details that some *“94% of newly formed households do not have enough of a deposit to buy a house and 40% of these cannot afford to rent properties in the private sector”*. The DPD acknowledges that *“this is having an increased impact on the need for affordable homes in the Borough”*.
- 2.14 Policy SADH3: Affordable Housing, explains that the Council will expect the size, type and tenure of future affordable housing to be in accordance with the information provided by the latest Housing Needs and Demands Study and any other information that the Council may collect with regard to housing need.
- 2.15 The monitoring indicator for the policy identified a target of 25% of all housing completions on eligible sites being provided as affordable housing which is carried through to Appendix 1 which sets out the core output and local output indicators.

Other Material Considerations

Emerging Black Country Core Strategy Review

- 2.16 The timetable for the emerging Plan anticipates consultation on a Draft Plan in autumn 2020. To date, the Plan has been subject to an Issues and Options consultation between July and September 2017.
- 2.17 The Issues and Options consultation proposes a revised Plan end date of 2036, although it is expected the plan period will be extended beyond this once submitted for examination. Indeed the recent Urban Capacity Study (December 2019) proposed a plan period of 2019 to 2038. Paragraph 2.9 reveals that when the housing trajectory is measured against the existing Core Strategy targets, this *“has resulted in the Black Country currently being 3,000 homes behind the Core Strategy target”* at the time of the publication of the Issues and Options consultation paper.
- 2.18 The consultation, at Key Issue 2: Meeting the Housing Needs of A Growing Population, acknowledges at paragraph 3.9 that one of the most important objectives of any local plan is to ensure that it identifies sufficient land for housing to meet the needs of people who are likely to live in the area over the period of the plan, and that this includes the children of residents already in the area who will grow up and want to form new households, together with people who will move into the area because of work, study or other reasons.
- 2.19 It goes on to recognise that as people are living longer, the existing housing stock is not being ‘freed up’ at the same rate that new households are forming.
- 2.20 Paragraph 3.10 identifies that the Black Country forms part of the wider Greater Birmingham and Black Country Housing Market Area and that the examination of the Birmingham Development Plan (adopted in January 2017) confirmed that there is a shortfall of 37,900 homes arising from Birmingham’s needs to 2031 that cannot be accommodated within the city even allowing for the proposals in the Plan to use land currently in the Green Belt.
- 2.21 Furthermore, paragraph 3.11 sets out that the Greater Birmingham and Black Country Strategic Housing Needs Study (2015) concluded that the supply of brownfield land across the HMA is insufficient to accommodate this shortfall and that the majority of this shortfall will have to be met on greenfield sites, including Green Belt land outside of Birmingham administrative areas.

- 2.22 In summarising the key issues at paragraph 3.61, the emerging Black Country Plan states that *“there is a gap between need and anticipated supply of around 22,000 homes and there is a need to look beyond the existing growth network to meet it”*. The subsequent 2019 Urban Capacity Study identifies a higher figure still, of some 26,920 homes which cannot be accommodated within the urban area; paragraph 4.10 of the Study considers the implications for development plan strategy, identifying ‘exceptional circumstances’ to justify Green Belt release.
- 2.23 Section six, at Table 3, provides a review of existing Core Strategy Policies and their compliance with the NPPF. This identifies that Policy HOU3: Delivering Affordable Housing may need a major degree of change in order to reflect changes in national policy and new evidence regarding affordable housing needs.
- 2.24 Further detail is provided at paragraph 6.35 where it set out that Policy HOU3 aimed to provide at least 550 new affordable homes per annum based upon the need set out in the 2008 SHMA. It reports that the target was significantly exceeded during 2009 to 2015 with 1,045 affordable homes provided per annum on average, the majority grant funded³.
- 2.25 Paragraph 6.36 reveals that the 2017 SHMA has updated housing need information and suggests that the affordable housing target should be higher at 832 per annum and considers this deliverable, but that this is dependent upon levels of grant funding in future.
- 2.26 It explains at paragraph 6.37 that whilst we await the secondary legislation for Starter Homes, based upon a discount of at least 20% below market value the SHMA found that within the Black Country, Starter Homes would not be priced below entry-level market housing and would not therefore be genuinely affordable. It reports that the SHMA estimates a need for 188 Starter Homes per annum.

Revised National Planning Policy Framework (February 2019)

- 2.27 The revised NPPF was published in February 2019 and is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.28 The revised NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to *“support strong, vibrant and healthy*

³ This fails to take account of any losses to stock through demolitions or Right to Buy

communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations” (paragraph 8).

- 2.29 Chapter 5 of the revised NPPF focuses on delivering a sufficient supply of homes, in which paragraph 59 confirms the Government’s objective of “*significantly boosting the supply of homes*”.
- 2.30 The revised NPPF is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include “*those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*” (paragraph 61).
- 2.31 The revised NPPF places a great responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. Paragraph 64 establishes that “*at least 10% of new homes on major residential developments be available for affordable home ownership*”.
- 2.32 Affordable housing is defined within the revised NPPF glossary as affordable housing for rent (in accordance with the Government’s rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), starter homes, discounted market sales housing (at least 20% below local market value) and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.33 The PPG was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the revised NPPF and provides further guidance on that document’s application.
- 2.34 Figure 2.1 sets out the paragraphs of the PPG of relevance to affordable housing.

Figure 2.1: PPG Paragraphs of Particular Relevance

Section	Paragraph	Commentary
Housing Need Assessment	006 (Reference ID: 2a-006-20180913)	The section sets out that assessments of housing need should include considerations of and be adjusted to affordability. This paragraph sets out that “ <i>an affordability adjustment is applied as household growth on its own is insufficient as an indicator of housing demand</i> ”. This is because:

Section	Paragraph	Commentary
		<ul style="list-style-type: none"> household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.
	021 (Reference ID: 2a-021-20180913)	Sets out that “ <i>all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework</i> ”
	022 (Reference ID: 2a-022-20180913)	States that “ <i>strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments)</i> ”.
	023 (Reference ID: 2a-023-20180913)	<p>The paragraph sets out that in order to calculate gross need for affordable housing, “<i>strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i></p> <ul style="list-style-type: none"> <i>the number of homeless households;</i> <i>the number of those in priority need who are currently housed in temporary accommodation;</i> <i>the number of households in over-crowded housing;</i> <i>the number of concealed households;</i> <i>the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> <i>the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.”</i>
	027 (Reference ID: 2a-027-20180913)	The paragraph states that “ <i>an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes</i> ”.
Planning Obligations	031 (Reference ID: 23b-031-20161116)	<p>Sets out that “<i>there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014 and should be taken into account.</i></p> <p><i>These circumstances are that:</i></p> <ul style="list-style-type: none"> <i>contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area)</i> <i>in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No</i>

Section	Paragraph	Commentary
		<p><i>affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty</i></p> <ul style="list-style-type: none"> <i>affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home”</i>
Housing and economic land availability assessment	019 (Reference ID: 3-019-20140306)	<p>In terms of assessing the suitability of a site in terms of allocating it for development, the paragraph recognises the importance of consideration of the needs of the community, stating:</p> <p><i>“Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build or commission their own homes, housing for older people, or for economic development uses.</i></p> <p><i>Assessing the suitability of sites or broad locations for development should be guided by:</i></p> <ul style="list-style-type: none"> <i>the development plan, emerging plan policy and national policy;</i> <i>market and industry requirements in that housing market or functional economic market area.”</i>

Source: Planning Practice Guidance (2019)

Corporate Documents

Housing Strategy Statement (2012-2022)

- 2.35 Section 1 of the Strategy at page three sets out that *“there is an increasing shortage of housing in the borough, especially affordable housing”* and that the *“central challenge of addressing the mismatch between the supply and demand for homes in some of our communities and ensuring that there is the right mix of type for now and in the future remains”*.
- 2.36 It goes on to explain that whilst the number of homeless and households in temporary accommodation had been decreasing, the number of households presenting to the service in recent months has increased significantly and the downward trend had reversed.

- 2.37 Section 2.1 covers the strategic approach to housing and commits to deliver actions that enable households in the social rented sector who are unsuitably housed to re-locate to more appropriate housing, in particular those who are living in over-crowded homes and those under occupying their current property.
- 2.38 In discussing the aim to improve the quality of housing available at page five, the Strategy Statement reveals that disrepair is by far the biggest cause of decent home failure with this most prevalent within the private rented sector (PRS) with a significant number of these experiencing fuel poverty.
- 2.39 Furthermore, it identifies there are above average levels of over occupation at 5% within the Borough compared to just 3% nationally.
- 2.40 Under the heading of ‘encouraging the building of new homes’ at stage six, the Strategy Statement explains that the results of the Housing Needs Study found that lower incomes combined with the restructuring of the mortgage lending market has made housing affordability a major issue in Sandwell. It notes that this applies in particular to newly forming households but also impacts on the ability of low-income homeowners to access funding to improve and maintain their home.
- 2.41 It goes on to report that the Council has an ambitious programme to build nearly 3,000 new homes by 2015 with at least 1,000 of these affordable to rent, part buy or sell⁴.
- 2.42 Under the heading of ‘protecting and promoting health, safety and wellbeing’ at page seven the Strategy Statement states that whilst homelessness prevention had been successful in recent years, more recently the number of households presenting to the service had grown considerably with notable increases in presentations from young people, private sector tenants and people in mortgage arrears.

Homelessness and Rough Sleeper Strategy (2018-2021)

- 2.43 The foreword, by Cabinet Member for Housing Cllr Kerry Carmichael, acknowledges that *“homelessness can affect our physical and mental health and wellbeing, educational achievement, ability to gain and sustain employment, and puts pressure on personal and family relationships. These effects, especially on children, can be life long and can cause repeated homelessness of a generational nature”*.

⁴ A total of 197 net additions were actually achieved between 2012/13 and 2014/15

- 2.44 In the introduction at paragraph 2.5 the Strategy explains that the challenges imposed by welfare reform together with the probability of rising housing costs will continue to place a significant number of Sandwell households into ‘housing stress’.
- 2.45 Paragraph 3.1 sets out that over the past three years over 12,000 households had approached the Housing Choice Service and whilst a third of these were helped to stay in their existing home two-thirds, the majority, were not.
- 2.46 Section six under the heading of ‘overview of homelessness in Sandwell’ states that the most recent monitoring period had seen a 12% increase with the most common reasons for approach to the homelessness service being parents/relatives unable/unwilling to accommodate (27%) and loss of assured shorthold tenancy (20%).
- 2.47 However, when judged solely upon those who the Council had a legal duty to rehouse, the loss of a private sector tenancy was the number one reason.

Sandwell Council Vision 2030

- 2.48 The Corporate Plan sets out 10 ambitions to achieve by 2030. Ambition seven sets out that Sandwell needs new areas of quality housing in places where people want to live and bring up their families.

Sandwell: Great People, Great Place, Great Prospects – Sustainable Community Strategy (2008)

- 2.49 Under the ‘Great Place’ heading the sustainable community strategy (SCS) envisages a range of new housing opportunities for people to rent or buy with the quality – private or social – being high.
- 2.50 At page 11, the SCS identifies that the availability of housing is constrained and acknowledges the need to build more, noting that there is a legacy of poor quality housing in the public sector.
- 2.51 Section six of the SCS sets out how the evidence will be used and under the heading of ‘great place’ identifies that “*there is a need to provide more affordable housing (especially for young people entering the housing market)*”.
- 2.52 Under the heading of ‘high quality and sustainable housing’ at page 30 the SCS aims to increase choice through ensuring a mix of affordable and aspirational housing accessible to all of the community.

Conclusions on the Development Plan and Other Material Considerations

- 2.53 There are a wide range of Sandwell Council documents that clearly highlight the need for more affordable housing within the authority area to address the existing housing issues within Sandwell. In addition to which the delivery of affordable homes has been a long-standing corporate priority of the Council.

Affordable Housing Needs and Past Delivery Record

Section 3

The Development Plan Position

- 3.1 The adopted Black Country Core Strategy does not define a numerical target for the provision of affordable homes on a disaggregated basis by local authority, instead it provides a global target of 11,000 affordable homes across the four authority areas.
- 3.2 The 2015/16 Annual Monitoring Report (AMR) for Sandwell at page 25 identifies that the affordable housing target for Sandwell, based upon 3,933 of the overall target of 11,000 across the HMA being required for Sandwell, equates to an average of 196 affordable homes per annum
- 3.3 It is also important to consider the objectively assessed need for affordable housing within the most up to date Strategic Housing Market Assessment. Whilst this has not been formally tested at Examination, it represents the most up to date position.

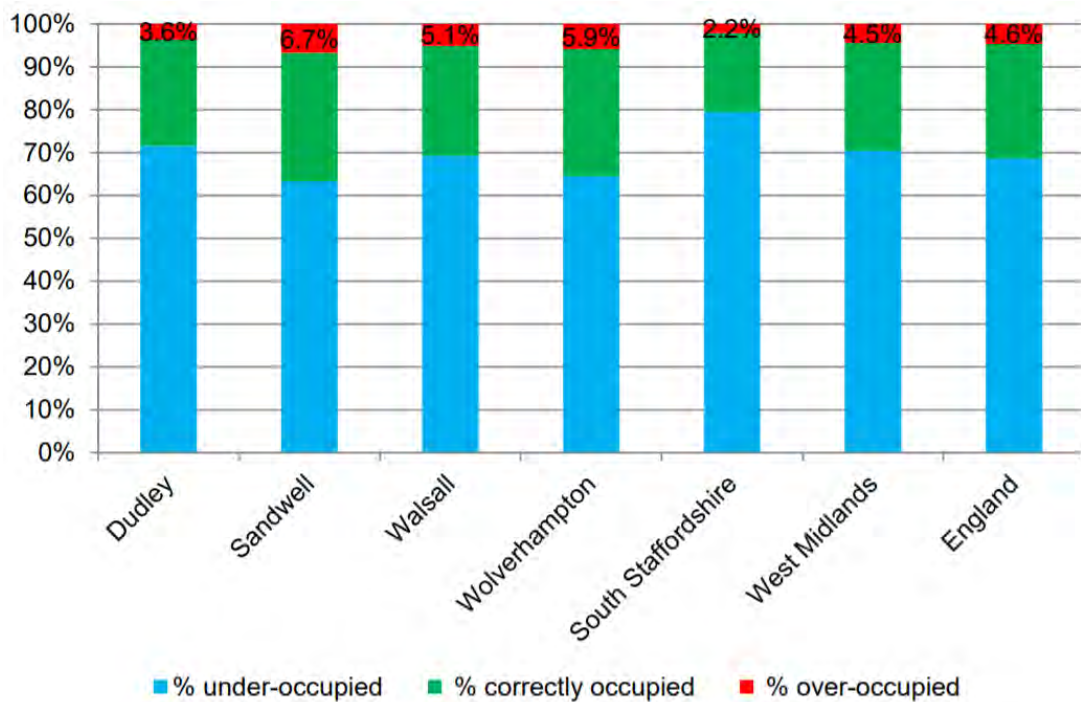
Affordable Housing Needs Evidence Base

- 3.4 The most recent assessment of affordable housing needs across the HMA is contained within the Black Country and South Staffordshire Strategic Housing Market Assessment (2017) which is split into two parts. Part 1 covers objectively assessed need and Part 2 covers affordable housing needs.

Strategic Housing Market Assessment Part 1 (2017)

- 3.5 At section five of Part 1 of the Strategic Housing Market Assessment it analyses market signals with paragraph 5.21 revealing that Sandwell has the highest proportion of overcrowded dwellings across the HMA and the lowest proportion of under occupied dwellings as illustrated by figure 3.1.

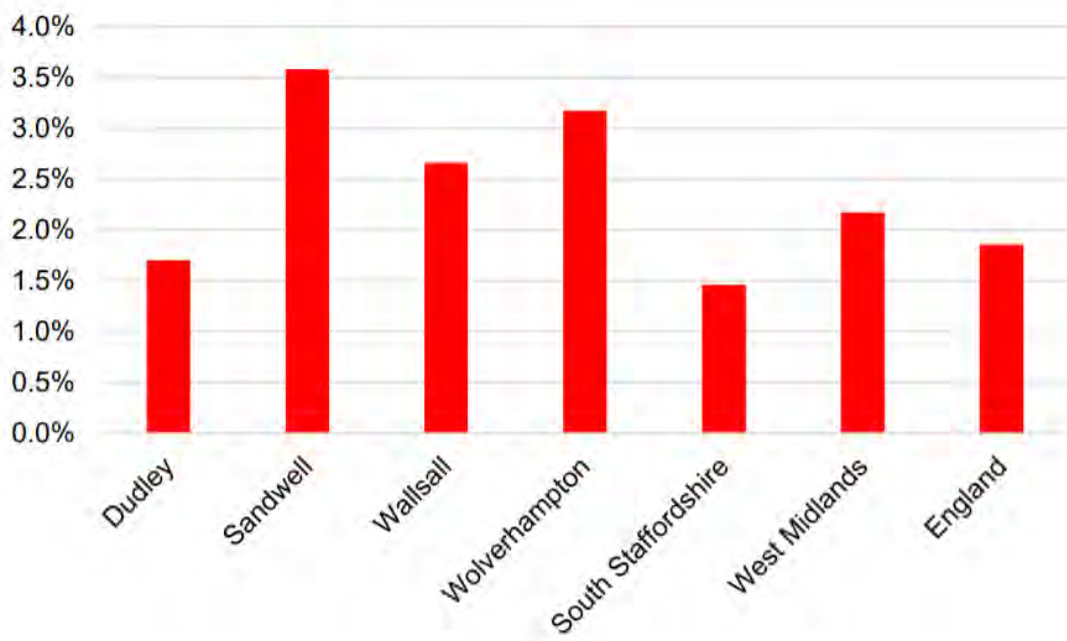
Figure 3.1: Overcrowding and under-occupation



Source: SHMA Part 1 (2017)

- 3.6 It goes on at paragraph 5.22 to set out that a further indicator is the number of concealed families, which it defines as one living in a multi-family household and which is not the primary family in that household. This includes couples with or without dependent children and lone parents of dependent children but excludes single people.
- 3.7 The Part 1 SHMA acknowledges that an abnormally large number of concealed households can be a sign of market pressure and as figure 3.2 below illustrates, Sandwell has the highest proportion of concealed households across the HMA, at almost twice the national average, which indicate market pressure.

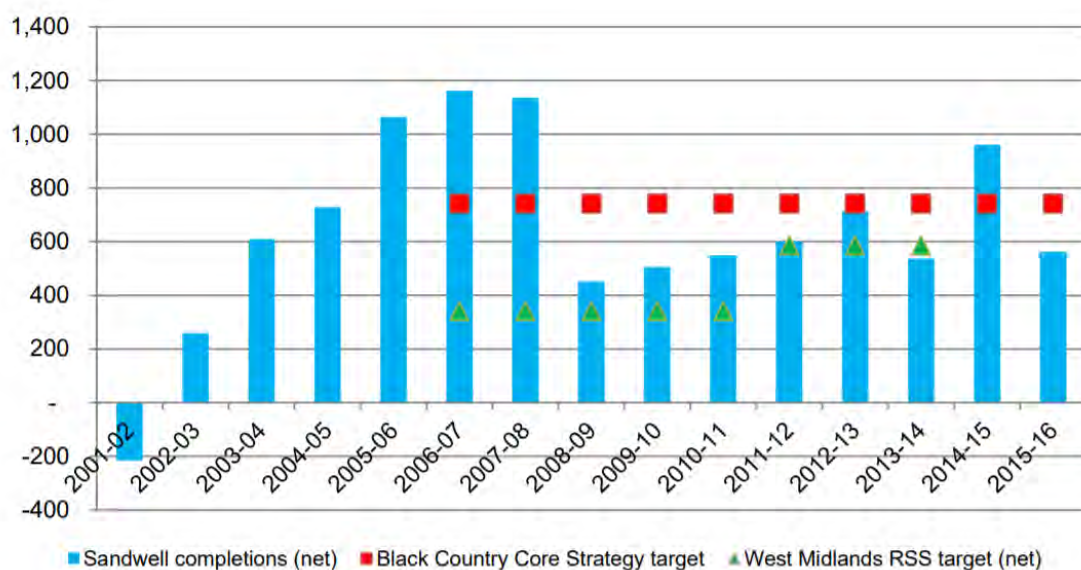
Figure 3.2: Concealed Households



Source: SHMA Part 1 (2017)

3.8 The Part 1 SHMA also provides analysis of housing completions performance against the Core Strategy target for 742 dwellings per annum in Sandwell between 2006 and 2016 and found that the target had been achieved only four times across the 10 year period as shown at figure 3.3. Overall, the Council fell short of achieving the target of 7,421.

Figure 3.3: Sandwell Housing Completions 2001-2016

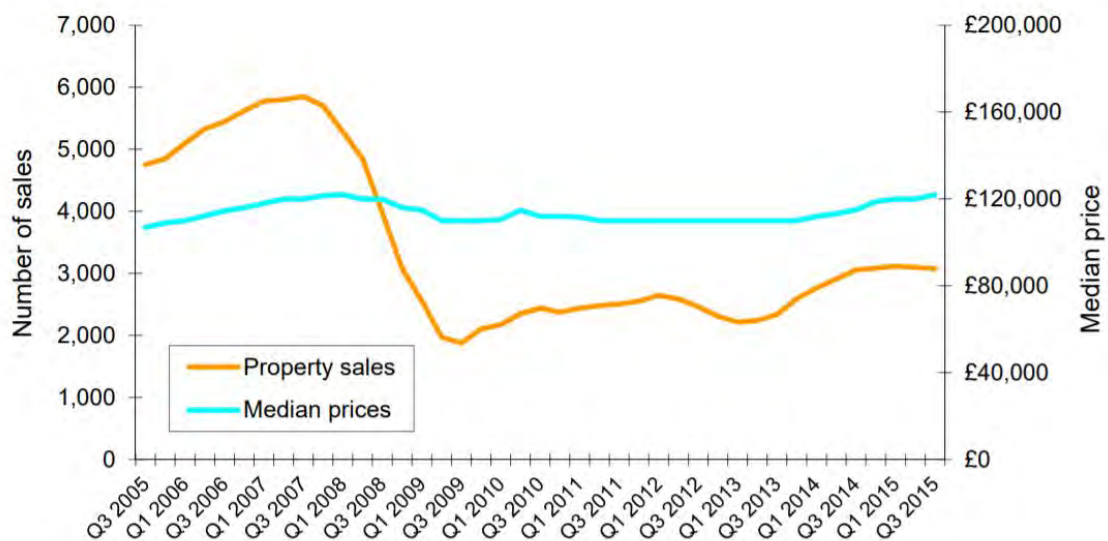


Source: SHMA Part 1 (2017)

Strategic Housing Market Assessment Part 2 (2017)

- 3.9 The Part 2 SHMA identifies at paragraph 3.3 that Sandwell had seen an average property price increase of 7.1% between 2010 and 2015.
- 3.10 Whilst Sandwell has seen a significant reduction in property sales following the 2007/08 financial crisis, median prices have remained consistent, as shown at figure 3.4.

Figure 3.4: Changes in Prices and Sales Levels in Sandwell over 10 years



Source: SHMA Part 2 (2017)

- 3.11 The Part 2 SHMA undertakes analysis of private market rents and social rents. Figure 3.5 below amalgamates the data to provide comparative analysis of the price variations between market and affordable rents within Sandwell.

Figure 3.5: Comparative Analysis of Private, Affordable and Social Rents in Sandwell

Bedrooms	Entry Level Private Market Rents (pcm)	Social Rents (pcm)	Affordable Rents (pcm)
One bedroom	£380	£307	£352
Two bedrooms	£500	£343	£431
Three bedrooms	£575	£391	£544
Four bedrooms	£700	£437	£569

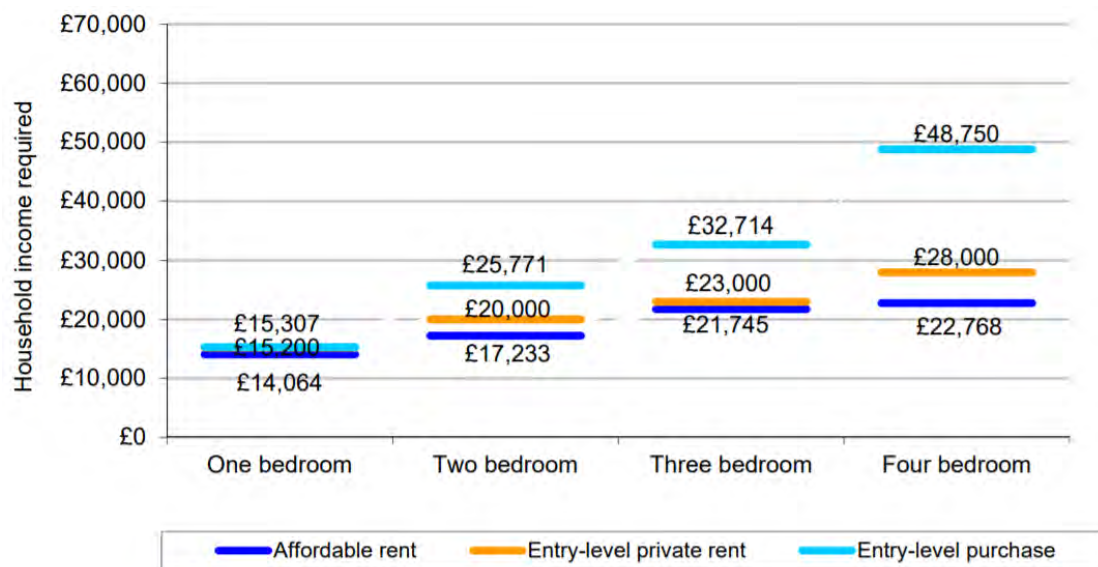
Source: SHMA Part 2 (2017)

- 3.12 The data shows that within Sandwell both social rents and affordable rents are more affordable than entry level private rents. The disparity between private market rental costs and those in the social/affordable sector increases the greater the number of

bedrooms, but even for a one bedroom home social rents are £73 pcm cheaper than market rents whilst for affordable rents the figure stand at £28 pcm cheaper.

- 3.13 In undertaking analysis of housing market ‘gaps’ the SHMA compares indicative income requirements per household for different types of housing. Measurement of the size of the gaps between these ‘rungs of the ladder’ helps assess the feasibility of households moving between the tenures. The smaller the gaps, the easier it is for a household to ascend the ladder. Figure 3.6 provides such as assessment for Sandwell. Figure 3.6 provides such as assessment for Sandwell.

Figure 3.6: Household income required in Sandwell to access housing, by number of bedrooms



Source: SHMA Part 2 (2017)

- 3.14 The data shows that the likelihood of a household climbing the housing ladder decreases as the number of bedrooms increased, for both rented and purchase properties.
- 3.15 It shows that in Sandwell entry level rents for a one bed property are 8% higher than affordable rent, for two beds its 16%, for three beds 6% and for four bed the difference is 23%.
- 3.16 In the case of entry level purchase, this is 1% higher than entry level rent for a one bed property, but then increase sharply to 29% for a two bed, 42% for a three bed and 74% for a three bed.

Figure 3.7: Comparative Analysis of private, intermediate and affordable rents in Sandwell

Bedrooms	Intermediate Rent	Entry-level Private Rent	Affordable Rent
One bedroom	£340	£380	£352
Two bedrooms	£440	£500	£431
Three bedrooms	£520	£575	£544
Four bedrooms	£620	£700	£569

Source: SHMA Part 2 (2017)

- 3.17 For intermediate affordable products, the SHMA details at paragraph 3.24 that this is more affordable than both entry level private rented and affordable rent across all bedroom sizes as illustrated by figure 3.7.
- 3.18 In assessing general affordability at paragraph 3.36 the Part 2 SHMA reveals that in Sandwell full-time workers with earnings at the lower quartile or median level would require substantial additional income or a capital sum to deduct from the purchase price to be able to afford a lower quartile property.
- 3.19 The SHMA undertakes analysis of potential demand for discount home ownership and reports potential annual demand for 62 such homes in Sandwell, consisting of 12 x 1-bed, 22 x 2-bed, 24 x 3-bed and 4 x 4-bed. A similar exercise is undertaken for shared ownership homes based on a 40% equity share which identified a potential need for 227 such homes per annum in Sandwell, made up of 50 x 1-bed, 78 x 2-bed, 70 x 3-bed and 29 x 4-bed.
- 3.20 At appendix 5 the Part 2 SHMA provides local authority specific affordable housing need figures. For Sandwell, based upon households being able to afford 30% of gross household income on rent, an annual need for 244 net affordable homes is identified, applying the Liverpool approach to backlog between 2011 and 2031.
- 3.21 Sensitivity testing undertaken within the SHMA indicates that if households were able to afford just 25% of gross household income on rent then the annual need would increase to 407 per annum, again applying the Liverpool approach to backlog.

Past Affordable Housing Delivery in Sandwell

3.22 Figure 3.8 illustrates the delivery of affordable housing in Sandwell in the period since 2004/05 and illustrates that there has actually been a net loss to affordable housing stock of some -454 dwellings as a result of Right to Buy sales.

Figure 3.8: Sandwell Housing and Affordable Housing Completions 2004/05 to 2018/19

Monitoring Period	Total Housing Completions (Net)	Gross additions to Affordable Housing Stock	Right to Buy Sales	Net Additions to Affordable Housing Stock	Net Affordable housing additions as a percentage of overall housing completions
2004/05	727	156	723	-567	0%
2005/06	1,064	104	467	-363	0%
2006/07	1,162	222	304	-82	0%
2007/08	1,136	195	213	-18	0%
2008/09	450	187	91	96	21%
2009/10	505	292	47	245	49%
2010/11	549	286	55	231	42%
2011/12	599	394	76	308	51%
2012/13	712	323	184	139	20%
2013/14	536	330	270	60	11%
2014/15	961	258	256	2	0.2%
2015/16	558	329	228	101	18%
2016/17	901	29	264	-235	0%
2017/18	676	72	296	-224	0%
2018/19	794	143	290	-147	0%
TOTALS	11,330	3,320	3,764	-454	0%

Source: Sandwell AMRs 2004/05-2015/16, Sandwell SHLAA and 5YHLS Update, CLG Live Table 1011c; CLG Live Table 685; CLG Live Table 691, FoI Response dated 13 July 2020

3.23 It is relevant to note that only 30% of Right to Buy receipts can be retained for use for affordable housing provision. At best, this will mean that the sale of two homes will be necessary to provide one new one which represents a considerable threat to the supply of affordable homes in Sandwell.

3.24 At a national level almost two million households have exercised their Right to Buy since it was introduced in 1980. In July 2015 the Conservative Government published

'Fixing the Foundations: Creating a More Prosperous Nation' which confirms that the Government is committed to extending the Right to Buy to housing association tenants, noting that *"since the Right to Buy for council tenants was reinvigorated in the last Parliament, the number of sales has increased by nearly 320%"*.

- 3.25 The Government undertook a Voluntary Right to Buy pilot scheme with a limited number of RPs in a limited area in 2016/17. In the Government's 2018 Autumn Statement, the Chancellor Philip Hammond, outlined that there would be a large-scale regional pilot scheme of Right to Buy for housing association tenants in the West Midlands. In May 2018 the Government published guidance on the voluntary Right to Buy Midlands pilot although details of when the pilot scheme will be launched remain unavailable. In September 2019, the Housing Secretary Mr Robert Jenrick, introduced new plans for housing association tenants to have the right to purchase a share in the equity of their property.
- 3.26 The extension of Right to Buy to Housing Association tenants is likely to further increase the loss of existing affordable housing stock, putting increasing pressure on the need to deliver more affordable homes in Sandwell in the future.
- 3.27 It should be noted that Sandwell is currently observing the highest rate of Right to Buy losses of any of the Black Country councils. Since 2009/10 (the last year for which comparable data was available for the councils) Sandwell has lost, on average, 197 affordable dwellings each year through the Right to Buy. This compares with an equivalent figure of 150 dwellings each year in Dudley, and 168 dwellings each year in Wolverhampton⁵.

Comparative Analysis of Delivery Against the SHMA

- 3.28 When comparing affordable housing delivery since 2011 (the base period of the 2017 SHMA) it can be seen that there has been an enormous shortfall of -1,948 affordable homes compared to a net need for 1,952 over the same period – with a net addition of just 4 additional dwellings to the housing stock. The Council have fallen 99% short of meeting identified net affordable housing needs.

⁵ Further explained at Figure 3.10; data at Appendix 1

Figure 3.9: Net Additions to Affordable Housing Stock Compared with Objectively Assessed Affordable Housing Need (2011/12 to 2018/19)

Monitoring Period	Net additions to Affordable Housing Stock	Net Affordable Housing Identified in 2017 SHMA	Shortfall in Affordable Housing Delivery Compared with Identified Needs
2011/12	308	244	64
2012/13	139	244	-105
2013/14	60	244	-184
2014/15	2	244	-242
2015/16	101	244	-143
2016/17	-235	244	-479
2017/18	-224	244	-468
2018/19	-147	244	-391
TOTALS	4	1,952	-1,948

Source: Sandwell AMRs 2004/05-2015/16, Sandwell SHLAA and 5YHLS Update, CLG Live Table 1011c; CLG Live Table 685; CLG Live Table 691; SHMA (2017); FoI Response dated 13 July 2020

- 3.29 An overall reduction in affordable housing stock over an eight-year period from 2011/12 is devastating to the households in need of affordable housing. In Tetlow King Planning’s experience this is virtually unparalleled compared to other authorities in England. It is hardly surprising that the affordable housing indicators considered in section 4 point to a bleak and worsening position.

Conclusions on Affordable Housing need and Past Delivery Record

- 3.30 There is an acute need for affordable homes in Sandwell with the most recent SHMA (2017) identifying a net need for 244 affordable homes per annum between 2011 and 2031.
- 3.31 The Council having overseen a net reduction in stock of some -454 affordable homes in the 15 year period since 2004/05 and when performance since the base period of the SHMA in 2011 is compared with delivery, there has been a shortfall of -1,948 affordable homes compared to objectively assessed needs. This represents a shortfall in delivery of an astonishing 99%.
- 3.32 In light of the Councils past performance and the level of identified need there is no doubt that sites such as this are absolutely necessary to address the affordable housing needs of Sandwell.

Past Affordable Housing Delivery across the Black Country area

- 3.33 As discussed at paragraph 3.1 above, the adopted Black Country Core Strategy seeks the delivery of a total of 11,000 affordable dwellings across the four Black Country councils. Over a twenty year plan period, this equates to 550 affordable dwellings per annum across the four councils.
- 3.34 Data on affordable housing completions (either supplied directly by the Councils or drawn from MHCLG data) shows that across the Black Country authorities, an average of 658 gross affordable dwellings have been completed each year since 2006/7, the start of the Plan period.
- 3.35 It is not possible to provide an accurate ‘like for like’ figure for the Black Country councils to account for Right to Buy losses, since Walsall Council does not hold such data, having transferred its housing stock to WHG. However, based upon the data supplied by the other Councils, it is clear there have been significant losses from the Right to Buy, with 5,154 recorded Right to Buy sales since 2009/10. In 2018/19, 739 affordable dwellings were lost from the overall stock across Dudley, Sandwell and Wolverhampton councils. This suggests that the issue of Right to Buy is problematic across the whole Black Country area.

Figure 3.10: Right to Buy sales in Black Country councils (2009/10 to 2018/19)

Monitoring Period	Right to Buy Sales			
	Dudley	Sandwell	Wolverhampton	Total
2009/10	40	47	23	110
2010/11	69	55	51	175
2011/12	61	76	60	197
2012/13	191	184	119	494
2013/14	199	270	211	680
2014/15	168	256	196	620
2015/16	206	228	222	656
2016/17	193	264	249	706
2017/18	193	296	288	777
2018/19	184	290	265	739
TOTALS	1,504	1,966	1,684	5,154
AVERAGE	150	197	168	515

Data not available for Walsall Council. Source: FoI Responses, see Appendix 1

Affordability Indicators

Section 4

Market Signals

- 4.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability in the context of Plan making.

Average Affordability ratio

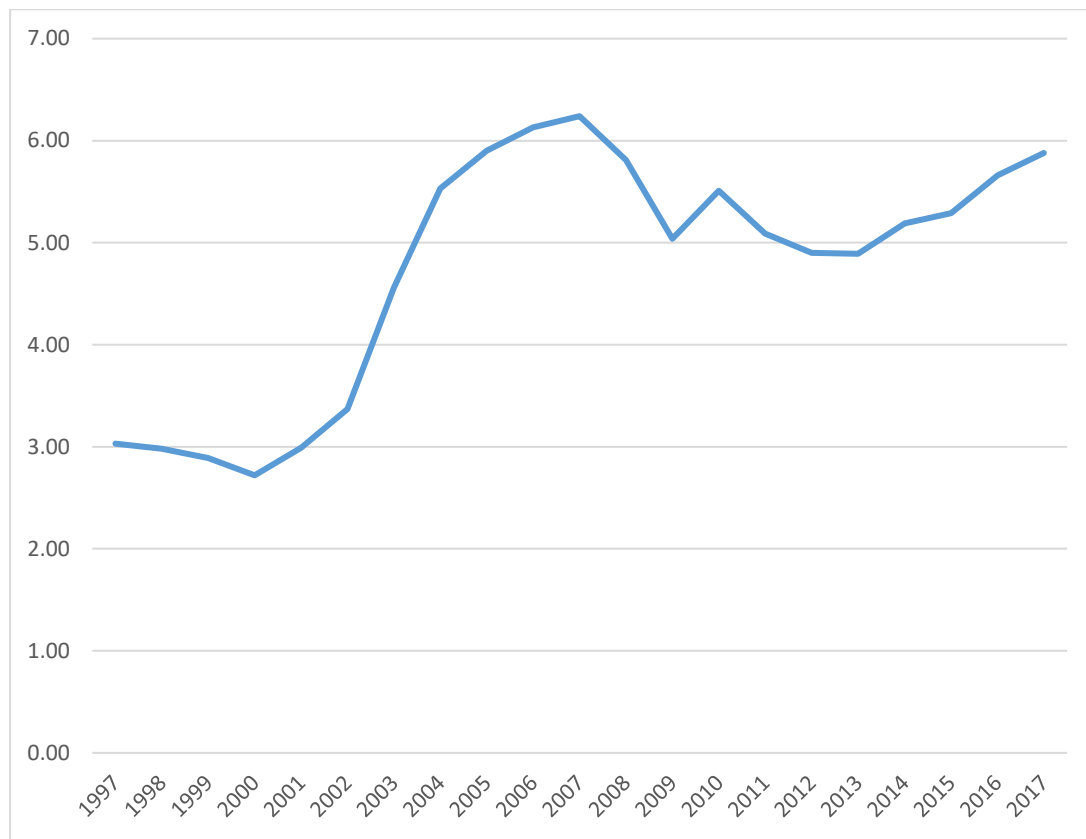
- 4.2 Published in November 2019, the NHF's Home Truths Report 2018/19 for the West Midlands found that the average value of a house in Sandwell is £150,603. Following a review of previous Home Truths Reports the data shows that average property prices in Sandwell are now approximately £32,120 higher than they were in 2013.

- 4.3 As more people in the region are priced out of buying a home, inevitably the number of private renters increases, however this group experiences short term tenancies that offer little stability. The NHF reports have also found that the cost of renting privately in Sandwell is also becoming less affordable with average monthly rents standing at £561 in the 2018/19 report, rising from £510 in the 2015/16 report, equivalent to an additional £51 per month (10% increase) in only three years.

Lower Quartile Affordability Ratio

- 4.4 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the situation is bleak. As figure 4.1 illustrates, lower quartile house prices in relation to lower quartile incomes in Sandwell have risen dramatically since the turn of the millennium, more than doubling from a ratio of 2.72 in 2000 to 6.05 in 2019.

Figure 4.1: Ratio of Lower Quartile House Prices to Lower Quartile Incomes in Sandwell



Source: ONS – Ratio of lower quartile house prices to lower quartile gross annual workplace-based earnings, Table 6c

- 4.5 To put this graph into context, those on lower quartile incomes seeking a lower quartile property would need to find over six times their annual income to purchase a home at the lowest priced end of the market. This graph illustrates a rapidly rising upward curve, with ratios matching the peak prior to the 2008 financial crisis, thereby demonstrating the worsening affordability issues in Sandwell.

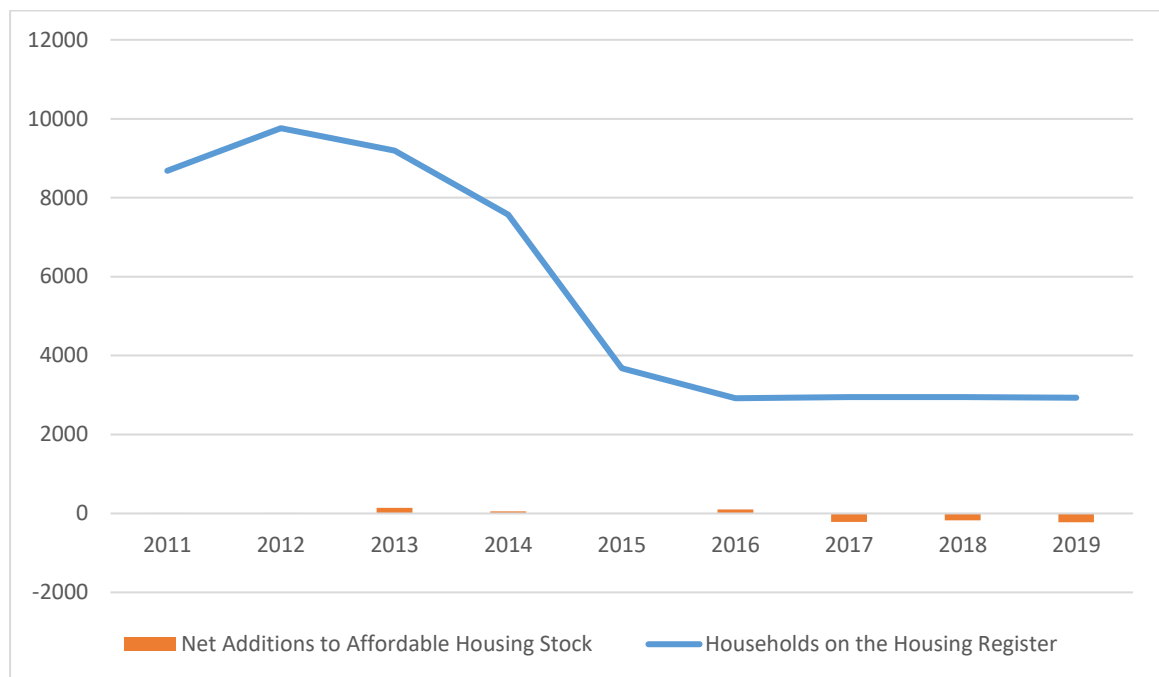
Sandwell Council Housing Register

- 4.6 On 1 April 2019 there were a total of 2,935 households on the Sandwell Housing Register according to MHCLG data. Figure 4.2 provides comparative analysis of the number of households on the Register compared to the net additions to affordable housing stock and illustrates that net additions to stock have persistently fallen significantly short of coming anywhere near addressing identified needs on the Housing Register.
- 4.7 As a result of changes introduced by the Localism Act 2011, Local Housing Authorities have been able to set their own Housing Register criteria from June 2012. For many

authorities this has meant excluding applicants already on the list who no longer meet their new narrower criteria but who were still in need of affordable housing. It should be noted that the significant drop in the housing register observed from 2013 to 2016 coincides with the introduction of a new local allocations policy in Sandwell which took effect in April 2013. This introduced a restrictive residency requirement, with applicants or their close relatives needing to live in the Borough for at least five years to qualify (with certain exceptions). Notably, the Council eased this to two years in July 2020.

- 4.8 Such an approach does not reduce the need for affordable housing but instead makes it even harder for those unable to access open market housing to find a suitable place to live, with even more at risk of homelessness.

Figure 4.2: Households on the Housing Register compared with Net Affordable Housing Additions to stock



- 4.9 A recent appeal decision⁶ in April 2020 has highlighted the importance of recognising the people on the housing register. Inspector DM Young asserted that in the context of a lengthy housing register of 2,421 households *“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses”* (emphasis added). He went on to state that *“Although affordable housing need is not unique to this district,*

⁶ Appeal decision reference - APP/Q3115/W/19/3230827

that argument is of little comfort to those on the waiting list” before concluding that “Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.

- 4.10 In the planning balance the Inspector stated that, *“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”.*
- 4.11 In determining the South Oxfordshire appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery.
- 4.12 Undoubtedly, all of the 2,935 households on the Sandwell Housing Register are in the words of Inspector Young, *“a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses”.* Moreover, given the application of restrictive criteria in Sandwell, those 2,935 households are likely to be an underestimate of the true number of households in need of affordable housing.

Homelessness and temporary accommodation

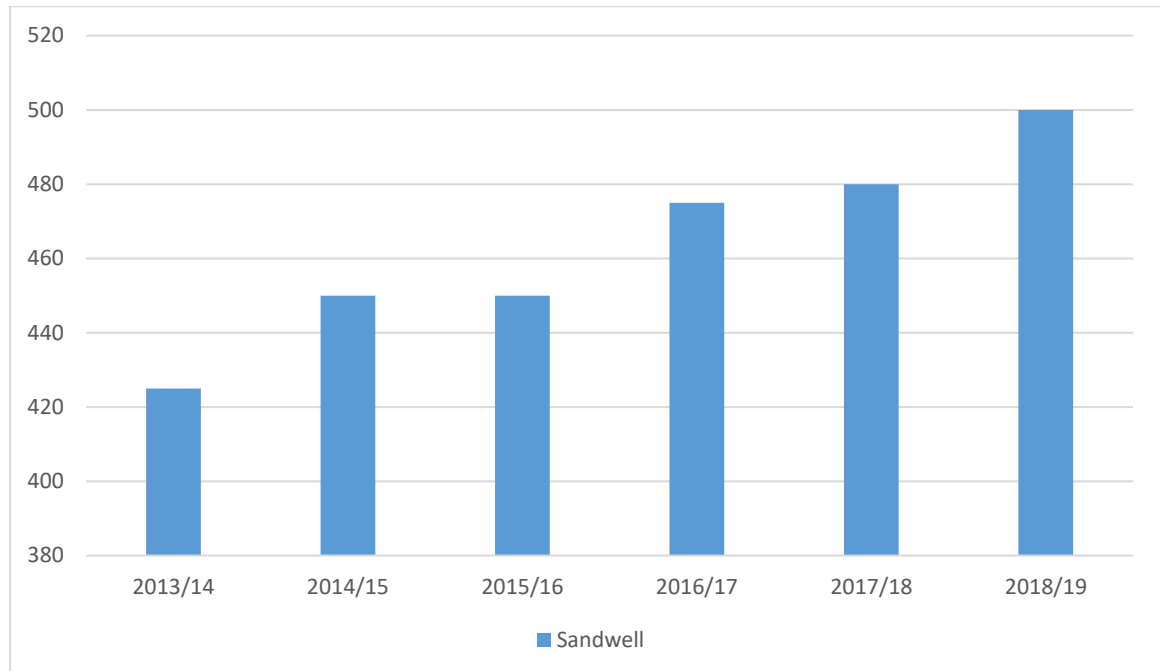
- 4.13 The most recent data available is MHCLG’s ‘initial assessments of statutory homelessness duties owed’ which showed that for the period up to September 2019, there were 141 households owed a duty. These are real people, in real need, now.
- 4.14 Information provided by the Council in its Freedom of Information response shows that on 1 April 2018, the Council was housing 38 households in temporary accommodation within the Sandwell authority area, and 2 households outside the authority area. This has increased, such that on 1 April 2019, the Council was housing 53 households in temporary accommodation within the Sandwell authority area, and 6 households outside the authority area.

Private Rental market

- 4.15 As demonstrated by the Part 2 SHMA (2017) the private rented sector, even at entry level, has higher rents than those in the social rented or affordable rented sector.

- 4.16 Figure 4.3 shows the upward trend in the rate of increase of lower quartile monthly rents in Sandwell. In the past six years alone there has been an 18% increase in monthly private rental costs.

Figure 4.3: Lower Quartile Monthly Private Rental Costs 2013/14 to 2018/19



Source: Valuation Office Private Rental Market Statistics 2013/14 to 2018/19

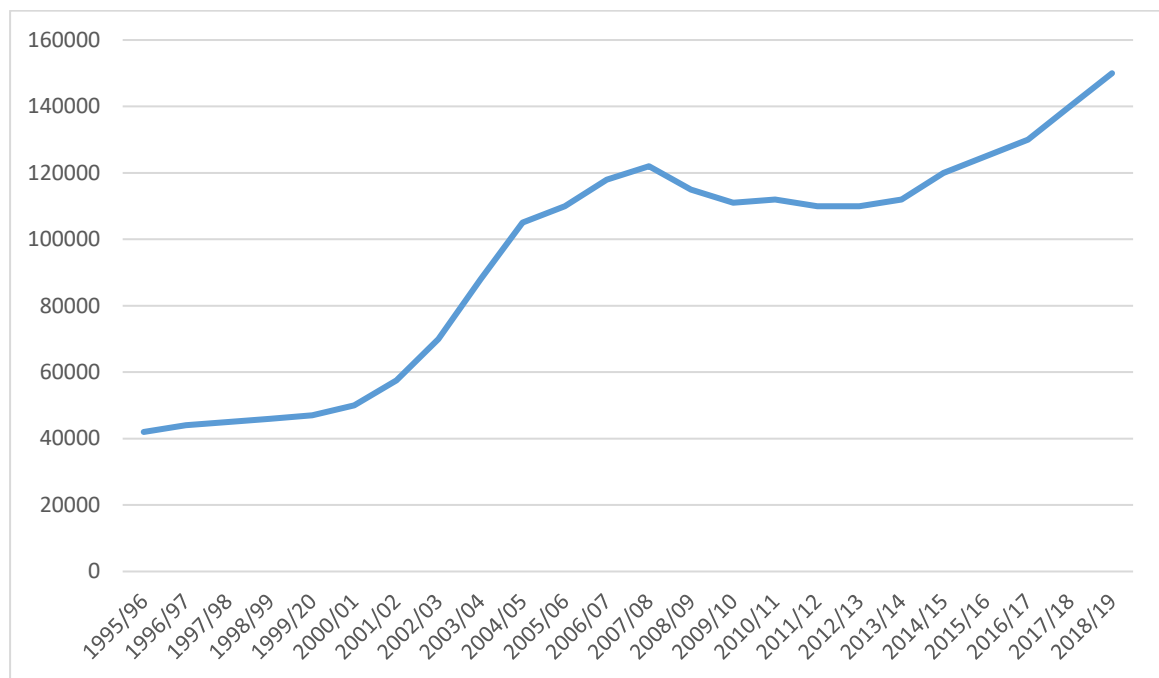
- 4.17 It is important to compare this with Registered Provider rents for Sandwell. In the 2018/19 monitoring period, Registered Provider rents for the authority area were £392⁷ pcm. This is some £108 pcm more affordable than the average lower quartile private rental costs.

House Prices in Sandwell

- 4.18 The NHF Home Truths report for the West Midlands 2018/19 identifies that there was an average house price of £150,603 in Sandwell.
- 4.19 ONS data shown at figure 4.4 illustrates that the median house price to income ratio within Sandwell has increased significantly since 1997 and now stands at its highest level since records began.

⁷ Based upon multiplying MHCLG weekly rental data taken from Live Table 704 by 4.4 to represent monthly rental costs

Figure 4.4: Median House Prices in Sandwell



Source: Median House Prices for Administrative Geographies HPSSA dataset 9

- 4.20 The NHF analysis also found that an income of £34,424 per annum would be required in order to obtain an 80% mortgage in Sandwell, yet by comparison the average annual earnings in the authority area were £29,427.

Conclusions on Affordability Indicators

- 4.21 As the analysis above demonstrates, affordability is undoubtedly a serious and pressing issue for residents at the lower end of the housing ladder in Sandwell. In addition, house prices and rents are increasing whilst the stock of affordable homes is being substantially depleted by the chronic losses arising from the Right to Buy sales, which has more than wiped out the additions to affordable housing.
- 4.22 Market signals indicate a worsening trend in affordability in Sandwell as a result of which a step change in affordable housing delivery is required to address identified needs and begin to address the significant shortfall in delivery compared to objectively assessed affordable housing needs.
- 4.23 It is plain to see the delivery of more affordable housing is urgently needed in Sandwell.

Appendix 1

Freedom of Information Correspondence
(Sent 19 March 2020 and 23 March 2020; received 22 April 2020; 14 May 2020; and 13 July 2020)



Jamie Roberts

From: Information Governance <Information.Governance@dudley.gov.uk>
Sent: 22 April 2020 13:06
To: Jamie Roberts
Subject: Housing Register DMBCIR:22930

Dear Mr Roberts,

Freedom Of Information Act 2000 - Information Request 22930

Your request for information received on 23/03/2020 has now been considered and the information requested is enclosed.

Your Request and **Our Response**

Housing Register

1. The total number of households on the Council's Housing Register at 1st April 2019.
[3799](#)
2. The average waiting times at 1 April 2017 and 1 April 2018 for the following types of affordable property:
 - a. A shared accommodation affordable dwelling; [N/A](#)
 - b. 1-bed affordable dwelling; [Average 19 months](#)
 - c. 2-bed affordable dwelling; [Average 15 months](#)
 - d. 3-bed affordable dwelling; [Average 13 months](#)
 - e. 4-bed affordable dwelling; and [Average 18 months](#)
 - f. A 4+ bed affordable dwelling. [Average 17 months](#)
3. The average waiting times at 1 April 2018 and 1 April 2019 for the following types of affordable property:
 - a. A shared accommodation affordable dwelling; [N/A](#)
 - b. 1-bed affordable dwelling; [Average 12 months](#)
 - c. 2-bed affordable dwelling; [Average 15 months](#)
 - d. 3-bed affordable dwelling; [Average 16 months](#)
 - e. 4-bed affordable dwelling; and [Average 18 months](#)
 - f. A 4+ bed affordable dwelling. [Average 25 months](#)
4. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed.

1st May 2014

[In accordance with the Cabinet decision of February 2014, the Director in conjunction with the Cabinet Member for Housing and Community Safety, implemented a two year Residency Qualification for joining the housing waiting list.](#)

[Residence Qualification and exemptions as per below:](#)

[Dudley's waiting list is open to people who have been living and or working in the borough for at least two years, or who qualify under one of the exemptions to this rule, which are :](#)

a) Armed Forces – with a connection to the borough

b) Anyone we have accepted or would accept as homeless as a result of domestic abuse

c) Temporary accommodation

- Anyone who previously lived in the borough for at least two years directly before temporarily living elsewhere e.g. lodging at partner's family home due to lack of space at the in borough address
- Anyone who previously lived in the borough for at least two years directly before living in temporary accommodation such as a refuge or hostel or supported housing scheme or prison or university halls or an out of borough care placement
- Anyone who is in our own temporary accommodation or temporary accommodation included in our Move On Protocol and who cannot be found a suitable and affordable option other than social housing e.g. young people who are working or training on a low income

d) Out of Borough Residential Care - Anyone who has been placed out of the Borough in a residential home that is funded by Dudley MBC/CCG/NHS, for example, people with learning disabilities, physical disabilities, Acquired Brain Injury who originate from the Dudley Borough or Looked After Child

e) Students who have lived for the majority of their lives in the Borough but have been living elsewhere in order to complete an educational course/obtain qualifications and wish to return

f) People who are homeless and can demonstrate that they have lived in the Borough for the majority of their lives and have not lived continuously for 2 years in any other Borough

g) Young people who have lived in the Borough for the majority of their lives but have been forced to move out of the Borough owing to family/relationship breakdown (moving with their parent) who have now reached the age of 18 and can apply for housing in their own right and would benefit from moving back into the Borough to be supported by family/wider support networks

h) Social housing tenants from out of borough who have worked in the borough for less than two years or are about to start work within the borough, and who would otherwise suffer hardship.

Housing Completions

5. The number of NET housing completions in the Dudley MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19.

Housing completions can be found on the following on the Government's Live tables on housing supply: net additional dwellings

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>

6. The number of NET affordable housing completions in the Dudley MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19.

We do not hold NET data regarding this. The monitoring target for the Black Country Core Strategy is gross Affordable housing completions. The Gross data is publicly available

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

Right to Buy

7. The number of social rented dwellings lost in the Dudley MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19 through:

- a. Right to Buy;
- b. Preserved Right to Buy; and
- c. Voluntary Right to Buy

Calendar

Year RTB	No. of RTB
2001	636
2002	953
2003	789
2004	527
2005	314
2006	232
2007	220
2008	67
2009	36
2010	40
2011	69
2012	61
2013	191
2014	199
2015	168
2016	206
2017	193
2018	193
2019	184

Please note the information is only held for total Right to Buy properties per year

8. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Dudley MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19.

RTBR SOS

2012/13	17
2013/14	0
2014/15	20
2015/16	26
2016/17	20
2017/18	62
2018/19	18

Please note there is no information before 2012/13 as that’s when the new Housing Self-Financing arrangements and the new Right to Buy higher discounts came in, so this is when the ability and expectation to build Right to Buy Replacement dwellings started, we also record starts on site rather than completions.

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within the Dudley MBC authority area at 1st April 2018.

The number is 5

10. The number of households on the Housing Register housed in temporary accommodation outside the Dudley MBC authority area at 1st April 2018.

The number is 0

11. The amount of money spent by Dudley MBC on housing people in temporary accommodation for the period 1 April 2018 to 31 March 2019.

The figure for 2018/19 is £86144.63

12. The number of households on the Housing Register housed in temporary accommodation within the Dudley MBC authority area at 1st April 2019.

The number is 7

13. The number of households on the Housing Register housed in temporary accommodation outside the Dudley MBC authority area at 1st April 2019.

The number is 0

14. The amount of money spent by Dudley MBC on housing people in temporary accommodation for the period since 1 April 2019.

The figure for 2019/20 is £98512.42 Plus £485.23 from April 2020 - date

If you have any queries or concerns then please contact me.

If you are unhappy with the service you have received in relation to your request and wish to make a comment or complaint, or request a review of the decision, you should write to the Freedom of Information Officer at Dudley MBC, The Council House, Dudley, West Midlands, DY1 1HF, telephone 0300 555 2345, e-mail information.governance@dudley.gov.uk.

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by Dudley MBC.

The Information Commissioner may be contacted at:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 01625 545 700
www.ico.org.uk

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Yours sincerely,

Mandy Fennell

Senior Information Governance Officer

Corporate Information Governance Team

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The Council House

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Dudley

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Please consider the environment - do you need to print this e-mail?

Jamie Roberts

From: Sandwell MBC <do_not_reply@sandwell.gov.uk>
Sent: 13 July 2020 07:53
To: Jamie Roberts
Subject: Information Request Response

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Jamie Roberts,

Information Request - FS-Case-185237396

Thank you for your Freedom of Information request. In response to your request I can confirm the following:
Dear Mr Roberts Freedom of Information Request – FS 185237396 Thank you for your Freedom of Information request received on 20th March 2020. You requested information relating to affordable housing matters. You requested the following: Housing Register 1. The total number of households on the Council's Housing Register at 1st April 2019. 2. The total number of households on the Council's Housing Register at 1st April 2019 specifying Great Barr and Yew Tree Ward as their preferred choice of location. 3. The average waiting times at 1 April 2017 and 1 April 2018 for the following types of affordable property: a. A shared accommodation affordable dwelling; b. 1-bed affordable dwelling; c. 2-bed affordable dwelling; d. 3-bed affordable dwelling; e. 4-bed affordable dwelling; and f. A 4+ bed affordable dwelling. 4. The average waiting times at 1 April 2018 and 1 April 2019 for the following types of affordable property: a. A shared accommodation affordable dwelling; b. 1-bed affordable dwelling; c. 2-bed affordable dwelling; d. 3-bed affordable dwelling; e. 4-bed affordable dwelling; and f. A 4+ bed affordable dwelling. 5. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed. Social Housing Stock 6. The total number of social housing dwelling stock at 1st April 2019 in Great Barr and Yew Tree Ward 7. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred. Social Housing Lettings 8. The number of social housing lettings in the period between 1 April 2017 and 1 April 2018 in Great Barr and Yew Tree Ward The number of social housing lettings in the period between 1 April 2018 and 1 April 2019 in Great Barr and Yew Tree Ward Housing Completions 9. The number of NET housing completions in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19. 10. The number of NET affordable housing completions in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19. 11. The number of NET housing completions in Great Barr and Yew Tree Ward broken down on a per annum basis for the period between 2000/01 and 2018/19. 12. The number of NET affordable housing completions in Great Barr and Yew Tree Ward broken down on a per annum basis for the period between 2000/01 and 2018/19. Right to Buy 13. The number of social rented dwellings lost in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19 through: a. Right to Buy; b. Preserved Right to Buy; and c. Voluntary Right to Buy 14. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19. 15. The number of social rented dwellings lost in the Great Barr and Yew Tree Ward area broken down on a per annum basis for the period between 2000/01 and 2018/19 through: a. Right to Buy; b. Preserved Right to Buy; and c. Voluntary Right to Buy Sandwell MBC does not record such information by Ward area. 16. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Great Barr and Yew Tree Ward area broken down on a per annum basis for the period between 2000/01 and 2018/19. Temporary Accommodation 17. The number of households on the Housing Register housed in temporary accommodation within the Sandwell MBC authority area at 1st April 2018. 18. The number of households on the Housing Register housed in temporary accommodation outside the Sandwell MBC authority area at 1st April 2018. 19. The amount of money spent by Sandwell MBC on housing people in temporary accommodation for the period 1 April 2018 to 31 March 2019. 20. The number of households on the Housing Register housed in temporary accommodation within the Sandwell MBC authority area at 1st April 2019. 21. The number of households on the Housing Register housed in temporary accommodation outside the Sandwell MBC authority area at 1st April 2019. 22. The amount of money spent by Sandwell MBC on housing people in temporary accommodation for the period since 1 April 2019. I can advise the following:- Housing Register 1. The

total number of households on the Council's Housing Register at 1st April 2019 was 5409. 2. The total number of households on the Council's Housing Register at 1st April 2019 specifying Great Barr and Yew Tree Ward as their preferred choice of location. This information is not recorded due to Sandwell MBC operating a Choice Based Lettings Scheme where applicants are invited to bid on properties of their choice. 3. The average waiting times at 1 April 2017 to April 2018 for the following types of affordable property:- A shared accommodation affordable dwelling; Sandwell MBC does not let or manage shared accommodation. The averages are based on all band average. For some property types the average wait time can be significantly influenced by the proportion of people registered at a band and the lower the band, the longer the wait range. The averages below should not be relied on due to the dependency or wait time range on banding decision. g. 1-bed affordable dwelling; 21.25 days h. 2-bed affordable dwelling; 44.48 days i. 3-bed affordable dwelling; 68.88 days j. 4-bed affordable dwelling; 125.42 days k. A 4+ bed affordable dwelling; 127.50 days 4. The average waiting times at 1 April 2018 to April 2019 for the following types of affordable property: g. A shared accommodation affordable dwelling; Sandwell MBC does not let or manage shared accommodation. h. 1-bed affordable dwelling; 17.44 days i. 2-bed affordable dwelling; 41.78 days j. 3-bed affordable dwelling; 72.30 days k. 4-bed affordable dwelling; 82.90 days l. A 4+ bed affordable dwelling; 150 days 5. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed. Following the introduction of the Localism Act, from 17 April 2013 the Council imposed a number of restrictions for people applying to join the housing register. In summary these restrictions involved the introduction of a five-year residency test to households or their close relatives who had no specific housing need as set out in the policy. This test is not applied to those who qualify under any one of the Statutory Reasonable Preference groups nor other groups set out in statutory guidance, e.g. members or ex-members of the armed forces. Further details are outlined in the Housing Allocations Policy that is available on the Council's website at www.sandwell.gov.uk. In particular I would draw your attention to Section B. Following a recent review of the policy the Council has opted to revise the five year residency test to a two year test again applied to those in general needs. This policy took effect on 1 July 2020. Social Housing Stock 6. The total number of social housing dwelling stock at 1st April 2019 in Great Barr and Yew Tree Ward was 676. 7. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred. The Riverside Housing Group PFI started in March 2006. Cotterills Farm TMO started in June 1998 Boscobel TMO started in July 2010 Social Housing Lettings 8. The number of social housing lettings in the period between 1 April 2017 and 1 April 2018 in Great Barr and Yew Tree Ward was 63. The number of social housing lettings in the period between 1 April 2018 and 1 April 2019 in Great Barr and Yew Tree Ward was 50 Housing Completions 9. The number of NET housing completions in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19. 10. The number of NET affordable housing completions in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19. 11. The number of NET housing completions in Great Barr and Yew Tree Ward broken down on a per annum basis for the period between 2000/01 and 2018/19. 12. The number of NET affordable housing completions in Great Barr and Yew Tree Ward broken down on a per annum basis for the period between 2000/01 and 2018/19. Please find spreadsheet attached, FOI April 2020 Housing Great Barr and Yew Tree. Right to Buy 13. The number of social rented dwellings lost in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19 through: a. Right to Buy; b. Preserved Right to Buy; and c. Voluntary Right to Buy Please find excel spreadsheet attached, Right to buy sales per year since 01, to answer a,b and c as requested. 14. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Sandwell MBC authority area broken down on a per annum basis for the period between 2000/01 and 2018/19. Sandwell MBC have been recoding this data from 2017 only, as follows:- 2017/2018 – 72 2018/2019 - 126 15. The number of social rented dwellings lost in the Great Barr and Yew Tree Ward area broken down on a per annum basis for the period between 2000/01 and 2018/19 through d. Right to Buy; e. Preserved Right to Buy; and f. Voluntary Right to Buy Sandwell MBC does not record this information. 16. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Great Barr and Yew Tree Ward area broken down on a per annum basis for the period between 2000/01 and 2018/19. Sandwell MBC does not record this information. Temporary Accommodation 17. The number of households on the Housing Register housed in temporary accommodation within the Sandwell MBC authority area at 1st April 2018. 38 18. The number of households on the Housing Register housed in temporary accommodation outside the Sandwell MBC authority area at 1st April 2018. 2 19. The amount of money spent by Sandwell MBC on housing people in temporary accommodation for the period 1 April 2018 to 31 March 2019 was £1.175m 20. The number of households on the Housing Register housed in temporary accommodation within the Sandwell MBC authority area at 1st April 2019. 53 21. The number of households on the Housing Register housed in temporary accommodation outside the Sandwell MBC authority area at 1st April 2019. 6

22. The amount of money spent by Sandwell MBC on housing people in temporary accommodation for the period since 1 April 2019 is £1.364m The service accepts that we should have provided the data available by the deadline and either stated that the remaining data was not available in the format requested or that the time and cost of collating the information would have exceeded the limit as this was the case at the time of the original deadline. This error was largely caused by conflicting demands around responding to the COVID outbreak and the current limited capacity and capability for this level of data analysis and reporting. The software issue has now been addressed and the Business Manager is putting in place contingencies to increase the capability and capacity in the service for data collation, reporting and analytics. I trust this answers your request satisfactorily, however, if you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your request, and should be addressed to:- Information Management Unit Sandwell Council House Freeth Street Oldbury West Midlands B69 3DE Email – info_management@sandwell.gov.uk If you are not content with the outcome of an internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Please remember to quote the reference number above in any future communications.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your request, and should be addressed to:

Information Management Unit
Sandwell Council House
Freeth Street
Oldbury
West Midlands
B69 3DE

Email - info_management@sandwell.gov.uk

If you are not content with the outcome of an internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Please remember to quote the reference number above in any future communications.

Yours sincerely

Sandwell MBC

For your information residents can now use their MySandwell account to log many Sandwell Council requests online, including reporting missed collections; fly tipping and pot holes. Residents can also check their council tax balance on MyAccounts and find "MyNearest" on their personalised homepage. For information please go to www.sandwell.gov.uk/mysandwell.

Sandwell FoI Response Attachment 1

Year	Borough Net Completions	Borough Affordable Housing Gross Completions	Net Completions in Great Barr and Yew Tree ward
2000/2001	1	120	16
2001/2002	-216	66	55
2002/2003	259	43	230
2003/2004	609	110	80
2004/2005	727	156	14
2005/2006	1064	104	2
2006/2007	1162	222	13
2007/2008	1136	195	17
2008/2009	450	187	2
2009/2010	505	292	2
2010/2011	549	286	1
2011/2012	599	394	16
2012/2013	712	323	26
2013/2014	536	330	7
2014/2015	961	258	0
2015/2016	558	329	0
2016/2017	901	29	0
2017/2018	676	72	0
2018/2019	794	143	0

Sandwell FoI Response Attachment 1

Affordable Housing Gross Completions in Great Barr and Yew Tree Ward
0
31
0
0
0
0
0
0
0
0
0
0
10
25
0
0
0
0
0
0

Sandwell FoI Response

Attachment 2

RIGHT TO BUY SALES PER FINANCIAL YEAR

SUMMARY of sales	
year	HOU RECORDS
2001/2002	601
2002/03	849
2003/04	1026
2004/05	723
2005/06	467
2006/07	304
2007/08	213
2008/09	91
2009/10	47
2010/11	55
2011/12	76
2012/13	184
2013/14	270
2014/15	256
2015/16	228
2016/17	264
2017/18	296
2018/19	290

Jamie Roberts

From: InformationRights@walsall.gov.uk
Sent: 23 April 2020 14:36
To: Jamie Roberts
Subject: RFI-1325-20 - Affordable Housing - Partial Response

Dear Mr Roberts,

Apologies for the delay.

Freedom of Information Request RFI-1325-20 - Partial Response

Further to your request for information about Affordable Housing, I can tell you the following:

Walsall Council is a stock transfer authority. The Housing Register is held by the stock transfer organisation which is Walsall Housing Group (WHG). Please request the information for questions 1,2,3,7,8 directly from WHG. Their contact website is; <https://www.whg.uk.com/contact-us/#> Therefore the information you have requested is not recorded or held information and is therefore exempt from disclosure under section 1 of the Freedom of Information Act.

4. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed. - NO

Housing Completions

5. The number of NET housing completions in the Walsall Council authority area broken down on a per annum basis for the period between 2000/01 and 2018/19.

The information is exempt from disclosure under the provisions of section 21. Section 21 sets out that the local authority need not provide information under the Freedom of Information Act where the information requested is 'reasonably accessible' by other means.

Affordable housing completions is publicly available - https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply?utm_source=7cb53d97-a3cf-46cc-8828-6e3495272dc0&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

6. The number of NET affordable housing completions in the Walsall Council authority area broken down on a per annum basis for the period between 2000/01 and 2018/19. See 5 above

The information for questions 9 - 14 regarding temporary accommodation is currently being collated and we will endeavour to provide the information as soon as possible. I would like to offer my apologies for any inconvenience the delay to this part of your request may cause you.

Most of the information that we provide in response to Freedom of Information Act 2000 requests will be subject to copyright protection. In most cases the copyright will be owned by Walsall Council. The copyright in respect of other information may be owned by another person or organisation, as indicated.

You are free to use any information supplied to you in response to this request for your own non-commercial research or private study purposes. The information may also be used for any other purpose allowed by a limitation or exception in copyright law, such as news reporting. However, any other type of re-use, for example by publishing the information in analogue or digital form, including on the internet, will require the permission of the copyright owner.

I hope that the information provided is useful to you. However, if you are dissatisfied, you should set out in writing your grounds for complaint and send to: Corporate Assurance Manager, Resources & Transformation, Civic Centre, Darwall Street, Walsall, WS1 1TP.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner's Office (ICO) for a decision. Please remember that, generally, the ICO cannot make a decision unless you have first exhausted the complaints procedure provided by the council. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. <https://ico.org.uk/global/contact-us/>

Yours sincerely,
Anne Perks

Assurance Team, Resources and Transformation
Walsall Metropolitan Borough Council,
Civic Centre,
Darwall Street,
Walsall, WS1 1DG
Email: informationrights@walsall.gov.uk
Service area: [walsall.gov.uk/ Information Governance and Assurance](http://walsall.gov.uk/Information-Governance-and-Assurance)
Website: www.walsall.gov.uk



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E-mail Security: *Communication by internet email is not secure as messages can be intercepted and read by someone else. Therefore we strongly advise you not to email any information, which if disclosed to unrelated third parties would be likely to cause harm or distress. If you have an enquiry of this nature please provide a postal address to allow us to communicate with you in a more secure way. If you want us to respond by email you must realise that there can be no guarantee of privacy.*

Jamie Roberts

From: InformationRights@walsall.gov.uk
Sent: 14 May 2020 10:16
To: Jamie Roberts
Subject: RFI-1325-20 Affordable Housing - full response

Dear Mr Roberts,

Freedom of Information Request RFI-1325-20

Please accept my sincerest apologies for the delay you have experienced in receiving a full response to your Freedom of Information Request. As you know, the council is required to respond to all requests for information under the Freedom of Information Act within 20 working days, unless a 'qualified exception' applies.

I am however happy to provide the full information you requested. I hope this information is still of use to you. Please note that the information given in this response is as at the date of your request. If you do have any queries or additional questions regarding the information that has been provided please do not hesitate to contact me direct on the details at the bottom of this email.

Further to your request for information about Affordable Housing, I can tell you the following:

Walsall Council is a stock transfer authority. The Housing Register is held by the stock transfer organisation which is Walsall Housing Group (WHG). We do not control the housing register.

Temporary Accommodation

9.The number of households on the Housing Register housed in temporary accommodation within the Walsall Council authority area at 1st April 2018.

Although we do not control the housing register in Walsall we can have up to 83 households in our own TA at any time and the majority of these would be placed on the housing register if appropriate to do so.

10.The number of households on the Housing Register housed in temporary accommodation outside the Walsall Council authority area at 1st April 2018.

It is our aim to provide TA within borough where appropriate to do so. We do not hold this data however the numbers would be very low. Therefore the information you have requested is not recorded or held information and is therefore exempt from disclosure under section 1 of the Freedom of Information Act.

11.The amount of money spent by Walsall Council on housing people in temporary accommodation for the period 1 April 2018 to 31 March 2019.

The service has gone through a large restructure during this time but the staffing spend to run TA would have been similar to 2019/20 - approximately £186k

12.The number of households on the Housing Register housed in temporary accommodation within the Walsall Council authority area at 1st April 2019.

Although we do not control the housing register in Walsall we can have up to 83 households in our own TA at any time and the majority of these would be placed on the housing register if appropriate to do so.

13.The number of households on the Housing Register housed in temporary accommodation outside the Walsall Council authority area at 1st April 2019.

It is our aim to provide TA within borough where appropriate to do so. We do not hold this data however the numbers would be very low. Therefore the information you have requested is not recorded or held information and is therefore exempt from disclosure under section 1 of the Freedom of Information Act.

14.The amount of money spent by Walsall Council on housing people in temporary accommodation for the period since 1 April 2019.

The staffing spend to run our TA for 2019/20 is £186,471

Most of the information that we provide in response to Freedom of Information Act 2000 requests will be subject to copyright protection. In most cases the copyright will be owned by Walsall Council. The copyright in respect of other information may be owned by another person or organisation, as indicated.

You are free to use any information supplied to you in response to this request for your own non-commercial research or private study purposes. The information may also be used for any other purpose allowed by a limitation or exception in copyright law, such as news reporting. However, any other type of re-use, for example by publishing the information in analogue or digital form, including on the internet, will require the permission of the copyright owner.

I hope that the information provided is useful to you. However, if you are dissatisfied, you should set out in writing your grounds for complaint and send to: Lead Assurance Officer, Business Change, Civic Centre, Darwall Street, Walsall, WS1 1TP.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner's Office (ICO) for a decision. Please remember that, generally, the ICO cannot make a decision unless you have first exhausted the complaints procedure provided by the council. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Again I would like to offer my apologies for any inconvenience the delay to your request may have caused you.

Yours sincerely,
Anne Perks

Assurance Team, Resources and Transformation
Walsall Metropolitan Borough Council,
Civic Centre,
Darwall Street,
Walsall, WS1 1DG
Email: informationrights@walsall.gov.uk
Service area: [walsall.gov.uk/ Information Governance and Assurance](http://walsall.gov.uk/Information-Governance-and-Assurance)
Website: www.walsall.gov.uk



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Response to Request for Information

Affordable housing

I can confirm that the information requested is held by City of Wolverhampton Council. I list below the information that is being released to you.

In that request you asked for the following:

Can you please provide the following data in line with the provisions of the Freedom of Information Act.

Housing Register

1. The total number of households on the Council's Housing Register at 1st April 2019. [10243](#)
2. The average waiting times at 1 April 2017 and 1 April 2018 for the following types of affordable property:
 - a. A shared accommodation affordable dwelling;
 - b. 1-bed affordable dwelling;
 - c. 2-bed affordable dwelling;
 - d. 3-bed affordable dwelling;
 - e. 4-bed affordable dwelling; and
 - f. A 4+ bed affordable dwelling.

[Due to the complex nature of the City of Wolverhampton Council's Housing Allocations Policy and the use of a choice based lettings system we are unable to provide meaningful information on waiting times as there are too many variable that an impact on how long an applicant may wait for a new home.](#)
3. The average waiting times at 1 April 2018 and 1 April 2019 for the following types of affordable property:
 - a. A shared accommodation affordable dwelling;
 - b. 1-bed affordable dwelling;
 - c. 2-bed affordable dwelling;
 - d. 3-bed affordable dwelling;
 - e. 4-bed affordable dwelling; and
 - f. A 4+ bed affordable dwelling.

Due to the complex nature of the City of Wolverhampton Council's Housing Allocations Policy and the use of a choice based lettings system we are unable to provide meaningful information on waiting times as there are too many variable that an impact on how long an applicant may wait for a new home.

4. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed.

Your request for information has now been considered and the City of Wolverhampton Council is not obliged to supply the information you requested for the reasons set out below.

Section 17 of the Freedom of Information Act 2000 requires City of Wolverhampton Council, when refusing to provide such information (because the information is exempt) to provide you, the applicant with a notice which:

- (a) states the fact,
- (b) specifies the exemption in question and
- (c) states (if that would not otherwise be apparent) why the exemption applies:

In relation to your particular request, the following exemption applies:

Section 12 - Exemption where cost of compliance exceeds appropriate limit

We can confirm that the Council holds information falling within the description specified in your request. However, Section 12 of the Freedom of Information Act 2000 allows a public authority to refuse a request if the cost of providing the information to the applicant would exceed the 'appropriate limit' as defined by the Freedom of Information.

The Regulations provide that the appropriate limit to be applied to requests received by local authorities is £450 (equivalent to 18 hours of work). In estimating the cost of complying with a request for information, an authority can only take into account any reasonable costs incurred in:

- (a) *Determining whether it holds the information,*
- (b) *Locating the information, or a document which may contain the information,*
- (c) *Retrieving the information, or a document which may contain the information,*

and

- (d) *Extracting the information from a document containing it.*

For the purposes of the estimate the costs of performing these activities should be estimated at a rate of £25 per hour.

The information appertaining to your request is not easily accessible and as such this information is not held as a distinct set able to be retrieved or reported on. To get the information would require a full scale look into all individual

records. This would be a manual exercise and as such we believe that the aggregated time it would take to collate the information would be in excess of 18 hours (equivalent to a notional cost of £450).

Excess cost removes the City of Wolverhampton Council's obligation under the Freedom of Information, however under Section 16 – (the duty to provide advice and assistance, the Council may be able to provide answers to the request, should you wish to submit a refined request.

Housing Completions

5. The number of NET housing completions in the City of Wolverhampton authority area broken down on a per annum basis for the period between 2000/01 and 2018/19.

2000/1	413
2001/2	106
2002/3	-28
2003/4	307
2004/5	509
2005/6	591
2006/7	300
2007/8	362
2008/9	429
2009/10	249
2010/11	59
2011/12	730
2012/13	466
2013/14	431
2014/15	677
2015/16	563
2016/17	577
2017/18	796
2018/19	709

6. The number of NET affordable housing completions in the City of Wolverhampton authority area broken down on a per annum basis for the period between 2000/01 and 2018/19.

2000/1	108
2001/2	99
2002/3	147
2003/4	91
2004/5	50
2005/6	162
2006/7	76
2007/8	139
2008/9	138
2009/10	164

2010/11	129
2011/12	95
2012/13	189
2013/14	102
2014/15	170
2015/16	48
2016/17	90
2017/18	157
2018/19	85

Right to Buy

7. The number of social rented dwellings lost in the City of Wolverhampton authority area broken down on a per annum basis for the period between 2000/01 and 2018/19 through:

a. Right to Buy; Right to Buy applications 13th July 2009. No information prior to this.

Financial Year	Number of Completions
13/07/2009	23
01/04/2010 to 31/03/2011	51
01/04/2011 to 31/03/2012	60
01/04/2012 to 31/03/2013	119
01/04/2013 to 31/03/2014	211
01/04/2014 to 31/03/2015	196
01/04/2015 to 31/03/2016	222
01/04/2016 to 31/03/2017	249
01/04/2017 to 31/03/2018	288
01/04/2018 to 31/03/2019	265
01/04/2019 to 31/03/2020	228

b. Preserved Right to Buy; and

c. Voluntary Right to Buy

8. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the City of Wolverhampton authority area broken down on a per annum basis for the period between 2000/01 and 2018/19.

The information is already publicly available on the Government website as each year every LA has to provide statistical data on its housing stock including additional housing units which have been acquired through using RTB 1-4-1 receipts. The link below shows each financial year and the returns for each LA so the data can be found here:

<https://www.gov.uk/government/collections/local-authority-housing-data>

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within the City of Wolverhampton authority area at 1st April 2018.

B & B (12)
LA Temp (58)
Total (70)

10. The number of households on the Housing Register housed in temporary accommodation outside the City of Wolverhampton authority area at 1st April 2018.
Nil
11. The amount of money spent by City of Wolverhampton on housing people in temporary accommodation for the period 1 April 2018 to 31 March 2019.
B & B Expenditure £283386.67
LA Temp Expenditure The Whitehouse £26500.00, Water £4655.63, Electricity £94'036.51, Schemes £26,579
12. The number of households on the Housing Register housed in temporary accommodation within the City of Wolverhampton authority area at 1st April 2019.
B & B (23)
LA Temp (53)
Total (76)
13. The number of households on the Housing Register housed in temporary accommodation outside the City of Wolverhampton authority area at 1st April 2019.
Nil
14. The amount of money spent by City of Wolverhampton on housing people in temporary accommodation for the period since 1 April 2019.
B & B Expenditure £718326.63
LA Temp Expenditure - The Whitehouse £26500.00, Water £2036.63, Electricity £94'036.51, Schemes £27,667.68.

Please quote the reference number 1568825 in any future communications.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to:

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Appendix 2: Site specific Green Belt Review (September 2021)



HIMOR

Birmingham Road Great Barr

Green Belt Review

6th October 2021

FPCR Environment and Design Ltd

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1.0 INTRODUCTION

- 1.1 This report provides a review of the land at Birmingham Road, Great Barr, in terms of the role of the land within the Green Belt and the potential harm from the removal of the land from the Green Belt, for two different development scenarios. The review is based on the methodology and approach contained in the “*Black Country Green Belt Study - LUC - September 2019*” produced for the Black Country authorities. This report provides conclusions on the role and potential harm, set out in the same way as the LUC report.
- 1.2 Stage 1 of the LUC Green Belt Study primarily addressed the variation on contribution of land to achieving Green Belt purposes. A series of land parcels were identified, given a reference number and a rating for each Green Belt purpose. The land at Great Barr lies within parcel B81 Wilderness Lane. This is outlined on page 277 of Appendix 2 to the study.
- 1.3 Stage 2 of the study was to identify “*potential harm*” from releasing land from the Green Belt. Within this stage of the study “sub parcels” were assessed. The land at Great Barr was identified as site 115. This covered the entire HIMOR land interest. Work carried out by the consultant team proposes Green Belt release for part of this land holding. This report carries out an assessment, using the same methodology and criteria as the LUC Green Belt assessment, to assess the smaller promoted land parcels.
- 1.4 The LUC methodology for the Stage 1 work is contained in Appendix 1. The LUC methodology for the Stage 2 work is contained in Appendix 2.

2.0 FPCR GREEN BELT REVIEW

Black Country Green Belt Study - LUC - September 2019

- 2.1 Following the LUC Methodology, the LUC study rates areas within the Green Belt as to how they contribute to the 5 nationally defined purposes of the Green Belt.
- 2.2 The study is divided into different stages. Stage 1 looks at the contribution different land parcels make to the purposes of the Green Belt. The site forms part of a parcel referenced B81 Wilderness Lane.
- 2.3 The FPCR assessment of parcel B81 broadly agrees with the LUC assessment in most respects, however, differs in respect of Purpose 2.
- 2.4 Under Purpose 2: Preventing the merging of neighbouring towns; the LUC report notes for parcel B81 that “*Land forms a narrow gap between towns, essential to maintaining a sense of separation between them.*”
- 2.5 The Stage 1 methodology states that “*Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.*”
- 2.6 FPCR consider that this is a more appropriate definition for this land parcel. The FPCR Stage 1 assessment for parcel B81 is contained at Appendix 3.

- 2.7 Stage 2 of the assessment looked at the potential harm of removal of each Green Belt sub-parcel from the Green Belt. The site forms part of Parcel B81a and this is described in Appendix 3 of the report from page 733.
- 2.8 The LUC study assesses a “*high*” harm rating for release of this parcel from the Green Belt.
- 2.9 HIMOR are promoting a smaller land parcel than that assessed in the LUC study. Two options are considered. Option 1 (parcel 115A) compromises land immediately west of Wilderness Lane and Option 2 (115B) includes additional land north to Birmingham Road. Both options have been assessed. On the basis of the FPCR review of the area and criteria, it is concluded that the harm rating for removal from the Green Belt of both these parcels would be “*Low/Moderate*”. The FPCR assessments for each parcel are included at Appendix 4.
- 2.10 Release of these parcels would maintain the separation of Walsall and Birmingham, and with significant open space and planting in the retained Green Belt area to the west, could reinforce the separation. Release of the sub parcels would not increase isolation of Green Belt land to the southeast (B83A and B84A), as suggested by LUC for the larger original parcel.
- 2.11 Release of either land parcel would result in minimal harm to the Green Belt.

Appendix 1 LUC Stage 1 Methodology

4 Stage 1 Methodology

Introduction

- 4.1 The following chapter sets out the methodology for the Stage 1 Green Belt Assessment. The primary aim of the Stage 1 assessment was to establish the variation in the contribution of land to achieving the Green Belt purposes as defined by the NPPF. Based on the assessment criteria outlined below, a strategic review of the contribution of all Green Belt land within the Council areas to each of the five Green Belt purposes was undertaken. This drew out spatial variations in the contribution of Green Belt land to each Green Belt purpose.

Strategic Assessment Process

- 4.2 Prior to any detailed assessment work, an initial visit was made to the area, to gain an overview of the spatial relationships between the settlements and the countryside in the Black Country.
- 4.3 The first main step then involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined in **Chapter 3** above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density not to affect to its designation as Green Belt.
- 4.4 The second step assessed the fragility of gaps between the settlements identified in **Chapter 3** as 'towns' under Green Belt Purpose 2.
- 4.5 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of development – i.e. in the first instance the Wolverhampton-Walsall conurbation – through to the smaller inset⁵² villages. If any significant areas of washed-over⁵³ urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside (as described in **Paragraph 4.3** above), the analysis:
- assessed the strength of relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features;
 - identified changes in the strength of relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features;
 - considered how these spatial relationships affect contribution to each of the Green Belt purposes, and mapped lines to mark these changes.
- 4.6 The analysis progressed outwards from each settlement until it was determined that land:
- ceases to play a significant role in preventing sprawl of a large built-up area;
 - either makes a consistent contribution to settlement separation, or makes no contribution to this purpose;
 - is strongly distinct from urban settlement and has a strong relationship with the wider countryside; and
 - makes no contribution to the setting or special character of a historic town.

⁵² 'Inset' development is development that is surrounded by Green Belt land but is not itself located within the Green Belt designation.

⁵³ Development 'washed-over' by the Green Belt is development that is located within the Green Belt designation.

Criteria for Assessment of Green Belt Contribution

- 4.7 To draw out clear variations in contribution to each Green Belt purpose the three point scale set out in **Table 4.1** was used.

Table 4.1: Green Belt Contribution Ratings

Strong Contribution	Green Belt performs well against the purpose.
Moderate Contribution	Green Belt performs moderately well against the purpose.
Weak/No Contribution	Green Belt makes a weak or no contribution to the purpose.

Purpose 1 Assessment Criteria

- 4.8 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). **Figure 3.1** indicates which settlements lie within large built-up areas. All of the development forms noted in the RTP1 note (see **para 3.17**) have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF⁵⁴).
- 4.9 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development, or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution.
- 4.10 Land which is more clearly associated with a settlement that is not a large built-up area can be considered to make no direct contribution to Purpose 1.
- 4.11 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
- Does the land lie in, adjacent to, or in close proximity to the large built-up area?
 - To what extent is the land open or does it contain existing urban development?
 - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
 - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl?
 - What is the degree of containment by existing built development or other features (e.g. by landform)?

⁵⁴ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

4.12 **Table 4.2** summarises the criteria that were used for the assessment of Purpose 1.

Table 4.2: Purpose 1 assessment criteria

Purpose 1: Check the unrestricted sprawl of large built-up areas	
Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.	
Location: land closer to the large, built-up area generally makes a stronger contribution.	
Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.	
Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.	
Strong Contribution	Land adjacent or close to the large built-up area that contains no or very limited urban development and has strong openness. It retains a relatively strong relationship with the wider countryside.
Moderate Contribution	Land adjacent or close to the large built-up area that contains some urban development and/or is to an extent contained by urban development, but retains openness and some relationship with the wider countryside.
Weak/No Contribution	Land adjacent or close to the large built-up area that is already fully urbanised; or land that is too contained by development to have any relationship with the wider countryside; or land that is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built-up area.

Purpose 2 assessment criteria

- 4.13 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considered both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This approach accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Settlements identified as towns are listed in **Table 3.1** and indicated on **Figure 3.2**.
- 4.14 Land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity was the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement was made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced.
- 4.15 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements also reduce the amount of countryside between towns, particularly as perceived from connecting roads.

- 4.16 In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, include:
- Does the land lie directly between two settlements being considered under Purpose 2?
 - How far apart are the towns being considered?
 - Is there strong intervisibility between the towns?
 - How do the gaps between smaller settlements affect the perceived gaps between towns?
 - Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
 - Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
 - What is the overall fragility/ robustness of the gap taking the above into account?

4.17 **Table 4.3** summarises the criteria that were used for the assessment of Purpose 2 in the study.

Table 4.3: Purpose 2 assessment criteria

Purpose 2: Prevent neighbouring towns from merging	
<p>Development/land-use: less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p>Location: land juxtaposed between towns makes a stronger contribution.</p> <p>Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p>Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p>Connecting features: where physical features strengthen the relationship between towns, e.g. where they are directly linked by a major road or have a strong visual connection, or where smaller urban settlements lie in between, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.</p>	
Strong Contribution	Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them.
Moderate Contribution	<p>Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or</p> <p>land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.</p>
Weak/No Contribution	<p>Land which is not located within a gap between towns; or</p> <p>land which plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or</p> <p>land which plays no significant role due to the extent of development; or</p> <p>land forming a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).</p>

Purpose 3 assessment criteria

- 4.18 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses.
 - ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).
- 4.19 Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through i) the scale of development, or ii) the degree of containment of the open land by development. Also the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 4.20 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view. However, the same land in Green Belt terms may well make as equal a contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
- 4.21 In summary, key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urbanising development?
 - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
 - Does land relate more strongly to the settlement(s), or to the wider countryside?
- 4.22 **Table 4.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

Table 4.4: Purpose 3 assessment criteria

Purpose 3: Assist in safeguarding the countryside from encroachment	
<p>Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution.</p> <p>Separating features: land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.</p> <p>Connecting features: an absence of physical features to link settlement and countryside means that land makes a stronger contribution.</p>	
Strong Contribution	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms ⁵⁵) and which does not have a stronger relationship with the urban area than with the wider countryside.
Moderate Contribution	<p>Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and/or other features); or</p> <p>Land which retains some degree of openness and has some relationship with the wider countryside but which is compromised by urbanising development or uses within it.</p>
Weak/No Contribution	<p>Land that contains urbanising development of a scale, density or form that significantly compromises openness; or</p> <p>Land which is too influenced and contained by urban development to retain any significant relationship with the wider countryside.</p>

Purpose 4 assessment criteria

- 4.23 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 4.24 In summary, key questions asked in assessing Purpose 4 include:
- What is the relationship of the land with the historic town?
 - Does the land form part of the setting and/or special character of an historic town?
 - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 4.25 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic towns.
- 4.26 **Table 4.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

⁵⁵ This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

Table 4.5: Purpose 4 assessment criteria

Purpose 4: Preserve the setting and special character of historic towns	
Development/land-use: less developed land makes a stronger contribution.	
Location: an area that contains key characteristics, or important in views to or from them, makes a stronger contribution.	
Separating features: land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution.	
Connecting features: where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.	
Strong Contribution	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's setting or special character.
Moderate Contribution	The land and its openness makes some contribution to the characteristics identified as contributing to a historic town's setting or special character.
Weak/No Contribution	Land forms little or no part of the setting of an historic town and does not contribute to its special character.

Purpose 5 assessment criteria

- 4.27 As set out in **Chapter 3** above, it was not considered possible to reasonably differentiate between the contribution of different parts of the Green Belt to Purpose 5. Given the historic and continued strategy to recycle brownfield land in urban areas within the Black Country, as set out in the Core Strategy and targeted through identified regeneration areas, the significant area of brownfield land within the Black Country, and the location of the Black Country authorities within the same Housing Market Area, it is concluded that all Green Belt land within the Black Country makes a strong contribution to urban regeneration by encouraging the recycling of derelict and other urban land.

Stage 1 Strategic Assessment Outputs

Analysis of variations in contribution to Green Belt purposes

- 4.28 The Stage 1 outputs are discussed in **Chapter 5**. Maps illustrating the assessed variations in contribution for each purpose across the Black Country are also set out in **Chapter 5**. Each map is accompanied by supporting text describing the pattern of variation and the reasoning behind its definition.
- 4.29 By combining the lines marking variations in contribution to Green Belt purposes, a list of land parcels was generated, each of which has a reference number and a rating for contribution to each purpose. The parcels are the product of the assessment rather than a precursor to it. The reasoning behind this approach was to draw out variations in contribution to inform the site-specific assessments undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Avoiding significant variations in contribution within defined parcels prevents the need for ratings to be generalised to reflect the strongest or average level of contribution within a defined area.

Appendix 2 LUC Stage 2 Methodology

6 Stage 2 Methodology

Introduction

- 6.1 This chapter sets out the methodology for the Stage 2 Green Belt assessment. The primary aim of the Stage 2 assessment was to identify the 'potential harm' of releasing land from the Green Belt.

Identification of assessment areas for Stage 2 assessment

- 6.2 In discussion with the Councils, the assessment area for Stage 2 incorporated all land within the four Black Country districts (excluding land which is constrained by absolute constraints as defined in para 6.5 below). This ensured that all promoted sites identified by the Councils through their 'call for sites' exercise were included in the assessment.
- 6.3 The promoted sites referenced in this report are for information only, and may not be comprehensive as new sites may emerge following publication. It should be noted that there are some cross-boundary promoted sites which may have been submitted through Black Country and/or South Staffordshire 'call for sites' exercises. A comprehensive and up-to-date map and list of 'call for sites' can be found at: <https://blackcountrycorestrategy.dudley.gov.uk/t5/> and <https://www.sstaffs.gov.uk/planning/shlaa-5-year-supply.cfm>.
- 6.4 Land was assessed at Stage 2 as 'sub-parcels', and where Stage 1 parcels occupied a large area which abutted more than one inset settlement edge, they were split into multiple sub-parcels for assessment at Stage 2. It was assumed that any land released from the Green Belt would need to be contiguous with an inset settlement or urban edge.
- 6.5 All of the areas identified for consideration at Stage 2 were overlaid with a set of 'absolute' environmental constraints – i.e. areas within which the Council would currently not permit development⁵⁶, these were identified as:
- Cultural Heritage:
 - Scheduled Monuments (SMs).
 - Registered Parks and Gardens (RPGs).
 - Natural Heritage:
 - Special Areas of Conservation (SACs).
 - Sites of Special Scientific Interest (SSSIs).
 - National Nature Reserves (NNRs).
 - Local Nature Reserves (LNRs).
 - Sites of Importance for Nature Conservation (SINC)⁵⁷/ Sites of Biological Importance (SBI).
 - Ancient Woodland⁵⁸.

⁵⁶ Whilst it is not envisaged that absolute constraints would be developed upon, absolute constraints might be included as part of wider development sites in the future if, for example, this would ensure that a nature conservation site could have its future management ensured.

⁵⁷ Potential SINC additions and removals are mapped and discussed within assessments, however this land is not excluded from the Stage 2 harm assessment as it is not currently / may not in the future be covered by an absolute constraint.

⁵⁸ The Ancient Woodland data used in this study is Natural England data. However, it is noted that Dudley and Walsall Councils also have additional information on ancient woodland within these districts, including that reflected in Walsall's Site Allocation Document (adopted January 2019) and Dudley's Borough Development Strategy (2017).

- Other Constraints:
 - Common Land.
 - Flood Zone 3 Areas.
 - Burial Grounds.

- 6.6 Defined sub-parcels excluded these areas of constraint where practical. The shape of areas of constraint, and of unconstrained areas around, did in some instances make it simpler to define sub-parcels that do include constrained areas, but in all instances the Stage 2 harm assessment disregarded these on the basis that, whether or not defined as Green Belt, they would not be developed. Stage 1 parcels that were identified as being wholly constrained or so highly constrained by absolute constraints that it was not considered that they could provide potential sites for development were excluded from the Stage 2 assessment of sub-parcels. Additional constraints, such as landscape sensitivity (as set out in the Stage 3 report) and the assessment of Green Belt harm (as set out in this report), will be considered as part of the wider evidence base⁵⁹ that will together inform site selection and the potential 'exceptional circumstances' to justify release of the land from the Green Belt.
- 6.7 The assessment parcels did not cover areas beyond the Black Country, even if there are no clearly defined boundaries on the ground. In some cases, the commentaries on individual parcels have offered comments as to whether features on the ground might provide possible boundaries in future, but this Study does not provide an assessment of the contribution to Green Belt Purposes or a basis to consider the harm of releasing land in neighbouring districts. The assessments did, however, consider all relevant factors such as the presence of towns and physical features beyond the study boundary, where relevant to the analysis.

Links between Stage 1 and Stage 2 assessment

- 6.8 The Stage 1 analysis of variations in contribution to the Green Belt purposes is a key component of the Stage 2 assessment.
- 6.9 Where a potential development site spans more than one Stage 1 parcel, it was subdivided accordingly, as the harm that would result from the release of each part of the site will potentially vary in line with the differing contribution of each part of the site to Green Belt purposes.
- 6.10 Conversely, where a number of potential development sites fall within the same Stage 1 parcel, these were grouped and assessed together within sub-parcels, as the harm that would result from the release of each part of the site will potentially be consistent.

Stage 2 Assessment Process

- 6.11 The Stage 2 assessment analysed each sub-parcel identified through the process outlined below.
- Step 1: Considered contribution ratings in more depth.
 - Step 2: Assessed potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessed overall Green Belt harm.
 - Step 4: Considered harm resulting from alternative Green Belt release 'scenarios'.
- 6.12 These steps are explained in further detail below.
- 6.13 Site visits were made to verify in the field the initial findings from the desktop analysis.

⁵⁹ This wider evidence base will consider a range of matters that would be relevant to the suitability, practicality and implications of developing sites. The topics to be considered will include matters such as the natural and built environment, open space, infrastructure, access to facilities, traffic and transport and the viability and deliverability of development.

Criteria for Assessment of Harm resulting from Green Belt Release

Step 1: Consider contribution ratings in more depth

- 6.14 Noting that the Stage 1 assessment used a three-point rating scale for contribution (strong, moderate or weak/no contribution), a finer grain of analysis was added by considering whether contribution to any of the purposes is particularly significant – e.g. where there is a particularly strong distinction between settlement and countryside, or a very fragile gap between towns – and whether the combination of contribution to different purposes makes the site more important in Green Belt terms.
- 6.15 Land that only makes a strong contribution to one purpose may result in high harm should it be released; however there is more potential for harm to be lower in this circumstance – if the impact on the integrity of the wider Green Belt is not significant – than is the case where there is a strong contribution to more than one purpose. Consideration was also given as to whether in some instances a moderate contribution across a number of Green Belt purposes might result in a higher level of harm.

Step 2: Assess potential impact of release on the integrity of the remaining Green Belt

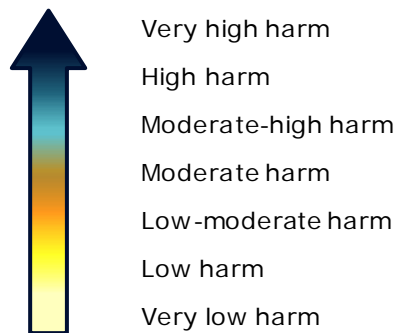
- 6.16 The assessment of contribution at Stage 1 already considers the relationship between a parcel and adjacent Green Belt land, but at the sub-parcel level it is possible to address how the loss of a specific area of land will affect Green Belt boundaries and the strength/ integrity of the adjacent Green Belt.
- 6.17 If Green Belt release significantly weakens the contribution of the adjacent Green Belt to the Green Belt purposes, then the harm is likely to be greater than that identified in Step 1. However, if there is no or limited impact on the contribution of the adjacent Green Belt, then the harm is likely to be less.
- 6.18 If the new Green Belt boundary results in a longer, more varied edge, or creates a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the wider Green Belt, but even if a strong alternative boundary can be defined, there is potential for the remaining Green Belt to be weaker – e.g. where a narrow strip of Green Belt remains between settlements or at the Green Belt fringe. Harm is lowest where release would have no adverse impact on the adjacent Green Belt and the boundary would be strengthened, either through creation of a shorter/simpler boundary or through use of a feature that marks a stronger or more widely consistent distinction between an urban area and countryside.
- 6.19 With respect to purposes 1, 3 and 4, the assessment considered the harm to adjacent Green Belt by assessing whether the contribution made by that land would be weakened as a result of release of the parcel/site under assessment. For Purpose 2 it is the robustness of the gap that would remain after release that was the key consideration, rather than impact on the contribution of the adjacent Green Belt, as the latter will increase as the gap becomes more fragile.
- 6.20 The considerations that were taken into account when assessing the impact of release on the strength of adjacent Green Belt included:
- **Purpose 1:** Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?
 - **Purpose 2:** How strong would the remaining settlement gap be if the Green Belt land were released? In order to answer this question consideration must be given to the size of the gap, the role of constraints and the location of separating and connecting features.
 - **Purpose 3:** Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside? Unless detailed development proposals are being considered the urbanising influence of future development is difficult to judge, so it is assumed that land beyond a new boundary that currently makes a significant contribution to Purpose 3 will continue to make a significant contribution to Purpose 3.

- **Purpose 4:** Would the role of remaining Green Belt in forming a distinctive setting to a historic town be diminished by loss of openness in the parcel/site under assessment?

6.21 The assessment considered the harm resulting from *extending* the nearest area(s) inset from the Green Belt, other than in cases where sub-parcels had been defined to encompass potential development sites promoted as new settlements, although in a few instances both options were assessed. Where sub-parcels being assessed as settlement extensions were not adjacent to an inset settlement, this means that the assessment of harm considered the 'cumulative' harm of release of the sub-parcel in question together with land between this and the inset edge.

Step 3: Assess overall Green Belt harm

6.22 Green Belt harm was rated using a seven point scale ranging from very high to very low harm.

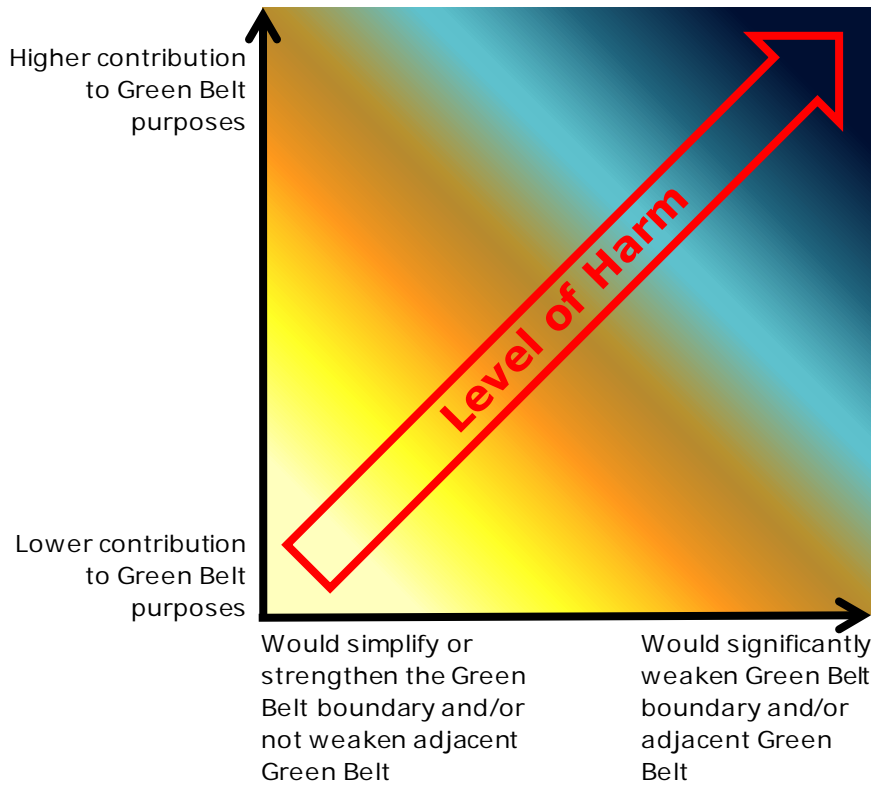


6.23 **Figure 6.1** provides an indication as to how the contribution to the Green Belt and the impact on adjacent Green Belt and the strength of the boundary influence the overall harm of Green Belt release. However, **professional judgement** is required in each individual case to consider how much weight to attach to each contributing element. For example:

- Where land makes a strong contribution to multiple Green Belt purposes, or a very strong contribution to a single purpose, and where its release would weaken the adjacent Green Belt (for example by leaving a narrow gap between towns), harm is likely to be **very high**.
- Where land makes a strong contribution to one of the Green Belt purposes, and where its release would partially weaken adjacent Green Belt (for example by increasing its containment by urban areas), harm is likely to be **high**.
- Where land makes a moderate contribution to one of the Green Belt purposes and a weak contribution to the others, but where its release would significantly weaken the adjacent Green Belt (for example by isolating an area of Green Belt that makes a stronger contribution), harm is likely to be **moderate-high**.
- Where land makes a relatively weak contribution to two of the Green Belt purposes and a weak contribution to the others, but where its release would partially weaken the adjacent Green Belt (for example by increasing containment of adjacent open land, or by creating a less consistent boundary line), harm is likely to be **moderate**.
- Where land makes a relatively strong contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt, harm is likely to be **low-moderate**.
- Where land makes a relatively weak contribution to one of the Green Belt purposes and a weak contribution to the others, and its release would not weaken the Green Belt boundary or the integrity of adjacent Green Belt land, harm is likely to be **low**.
- Where land makes a weak contribution to all Green Belt purposes, and its release would not weaken the integrity of adjacent Green Belt land, or would create a more consistent boundary better reflecting the distinction between urban settlement and countryside, harm is likely to be **very low**.

6.24 Clear and detailed justification is provided for all ratings (see **Appendix 3**) in relation to how the overall judgement of Green Belt harm was reached.

Figure 6.1: Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact of release on adjacent Green Belt





Step 4: Consider harm resulting from alternative release ‘scenarios’

- 6.25 The assessors first considered the parcel/sub-parcel as a whole, to identify which area(s) within the sub-parcel would result in the highest harm if released. The assessment assumed that land would be released out from an inset settlement edge, so typically harm will increase with distance from that boundary (if it is not already judged to be *high* immediately beyond the settlement edge).
- 6.26 Separate release scenarios were also mapped in cases where both settlement extension and the creation of a new inset area are relevant options, and where the harm resulting from one type of scenario would be less than the harm resulting from the other.
- 6.27 Consideration was then given as to whether the release of a smaller part or parts of the area would result in less harm to Green Belt purposes. Where this is the case, separate release scenarios were mapped, with separate ratings given for each lower level of harm identified, supported by text setting out the reason(s) for the reduced level of Green Belt harm.

Stage 2 Assessment Outputs

- 6.28 For each assessment sub-parcel, a Stage 2 assessment of harm was produced (see **Appendix 3**). This included the following information:
- Assessment area reference, size and brief description.
 - The Stage 1 contribution ratings relevant applicable to the assessment area, with supporting text.
 - 1:25,000 scale Ordnance Survey map showing parcel/site and surrounding context, with absolute development constraints and any nearby assessment parcels/sites⁶⁰.
 - An aerial view of the mapped area.
 - A photograph of the assessment area⁶¹.
 - Text setting out the analysis of harm that would result from release of the whole assessment area, together with a harm rating.
 - Harm analysis and rating for any alternative release scenarios identified for the assessment area, where potential harm could be reduced by release of a smaller area of land.
- 6.29 Without a clear and consistent definition of the scale, type and design of development which will come forward for development within a specific Green Belt location, the harm assessment was based on the assumption that the openness (in Green Belt terms) of a defined area will be lost. This approach ensured a consistent and proportionate approach was adopted across the study area.

⁶⁰ Promoted sites within the Black Country are labelled in light blue and promoted sites within South Staffordshire are labelled in dark

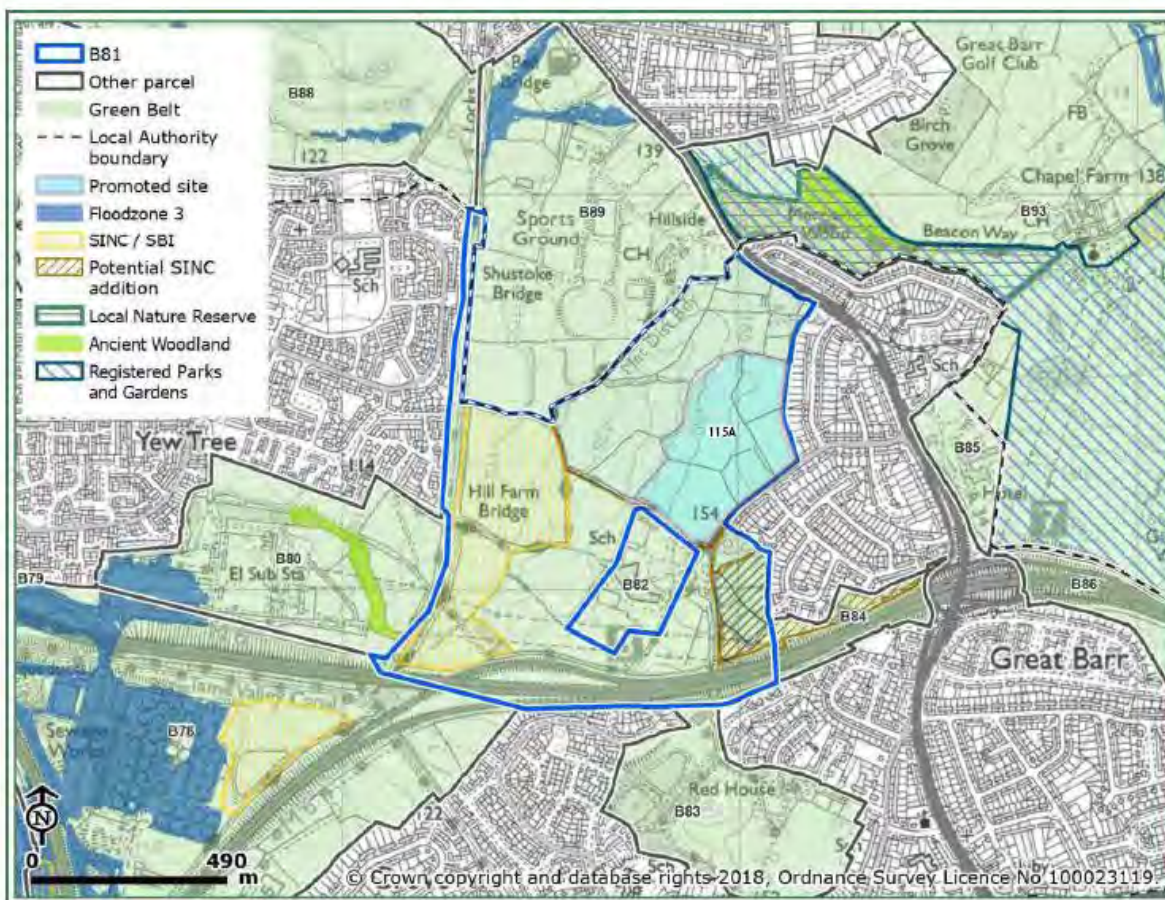
blue.  Promoted site (BC)  Promoted site (SS)

⁶¹ These photographs are illustrative and cannot be taken as representative of sub-parcels as a whole.

Appendix 3 FPCR Stage 1 Assessment

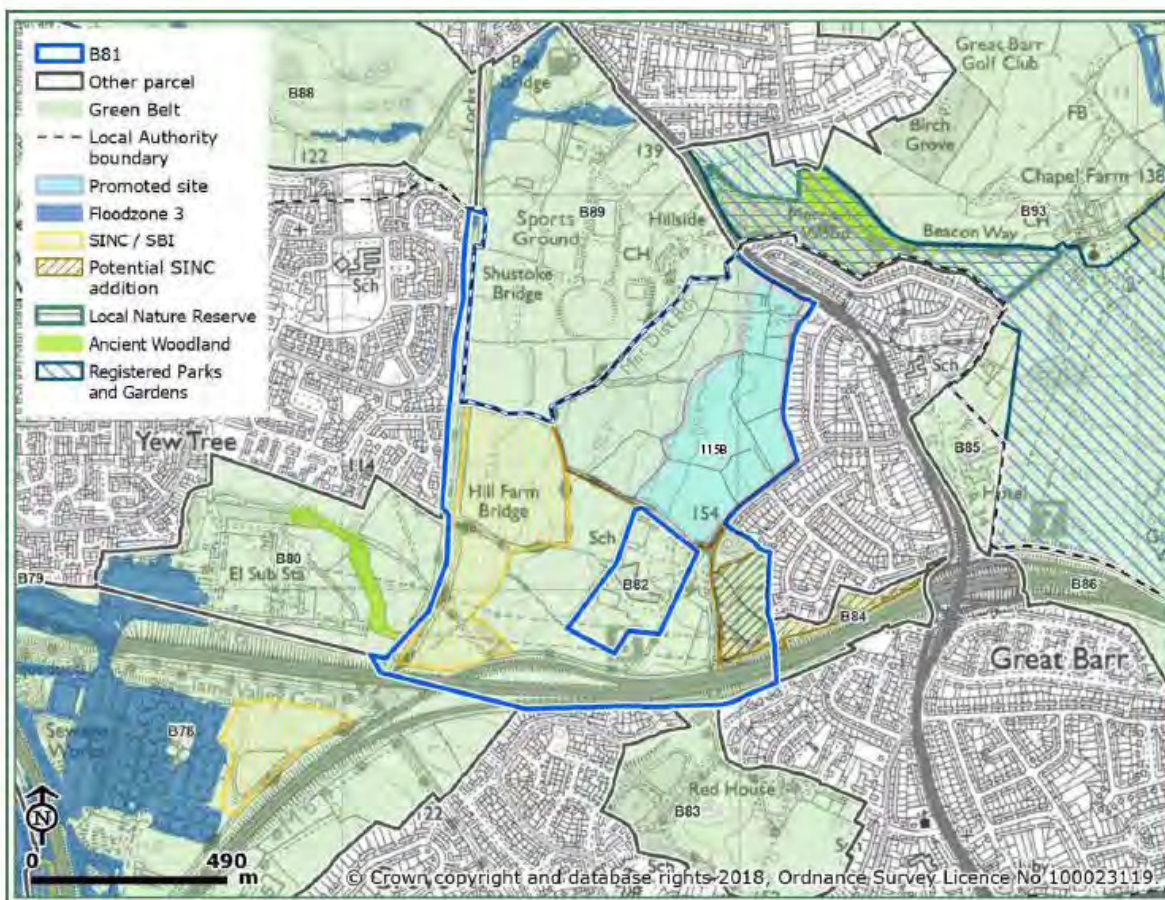
Parcel Ref B81 - Wilderness Lane
Promoted site 115A

B81 Parcel Size: 71.7ha



Parcel Ref B81 - Wilderness Lane
Promoted site 115B

B81 Parcel Size: 71.7ha



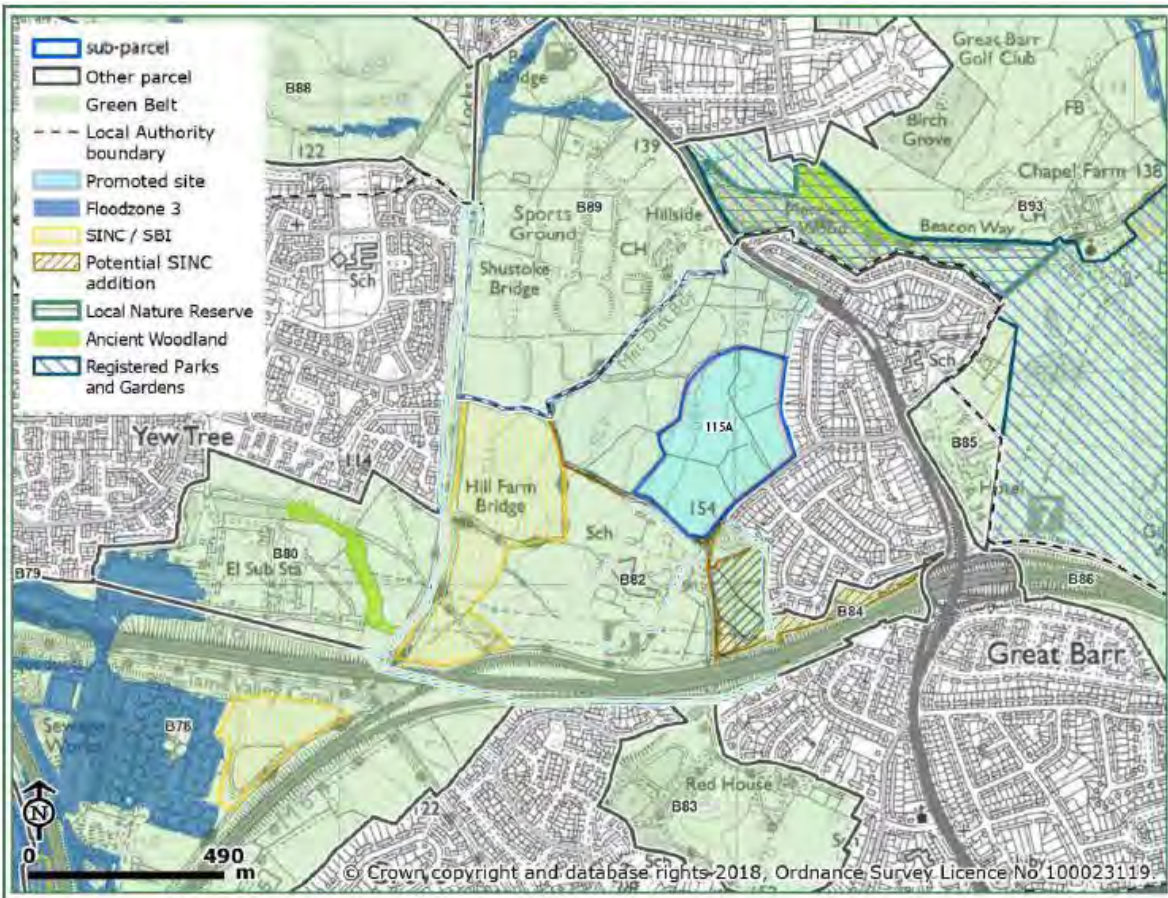
Assessment of Parcel Contribution to Green Belt Purposes

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent to the large built-up area. It is to a large extent contained by urban development, but retains some openness and some relationship with the wider open land. Much of the eastern part of the parcel is wrapped around by existing housing.	Moderate
P2: Preventing the merging of neighbouring towns	The land forms an open area but development beyond the parcel has compromised the sense of distinction. Parts of the parcel make very little contribution to the separate identity of settlements.	Moderate
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms), and has a stronger relationship with the urban area than with the wider countryside (ie it is contained in some way by urbanising and or other features).	Moderate
P4: Preserve the setting and special character of historic towns	Land does not form part of the setting of a historic town.	Weak/No Contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Appendix 4 FPCR Stage 2 Assessment

Parcel Ref B81 - Wilderness Lane
Promoted site sub-parcel 115A

Sub-Parcel 115A Size: 12.84ha



Sub-Parcel Description

Promoted site sub-parcel 115A

The sub-parcel comprises the eastern part of area B81 and this area makes a weak contribution to maintaining the separation of Walsall and Birmingham, as the sub parcel is largely contained by the existing housing at Great Barr and would not narrow the gap between the separate settlements. The sub parcel makes a moderate contribution to preventing the sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The sub-parcel is contained to the north, east and south by the settlement edge of Great Barr, forming part of the West Midlands conurbation. The Q3 academy lies to the south with a mix of buildings an open land, and woodland and the M6 motorway beyond that to the south.



View from within the sub-parcel towards properties off Peak House Road

Assessment of Parcel Contribution to Green Belt Purposes (as derived from Stage 1 study)

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent to the large built-up area. It is to a large extent contained by urban development, but retains some openness and some relationship with the wider open land. Much of the eastern part of the parcel is wrapped around by existing housing.	Moderate
P2: Preventing the merging of neighbouring towns	The land forms an open area but development beyond the parcel has compromised the sense of distinction. Parts of the parcel make very little contribution to the separate identity of settlements.	Moderate
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms), and has a stronger relationship with the urban area than with the wider countryside (ie it is contained in some way by urbanising and or other features).	Moderate
P4: Preserve the setting and special character of historic towns	Land does not form part of the setting of a historic town.	Weak/No Contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Assessment of Harm From Release of Land within Sub-Parcel

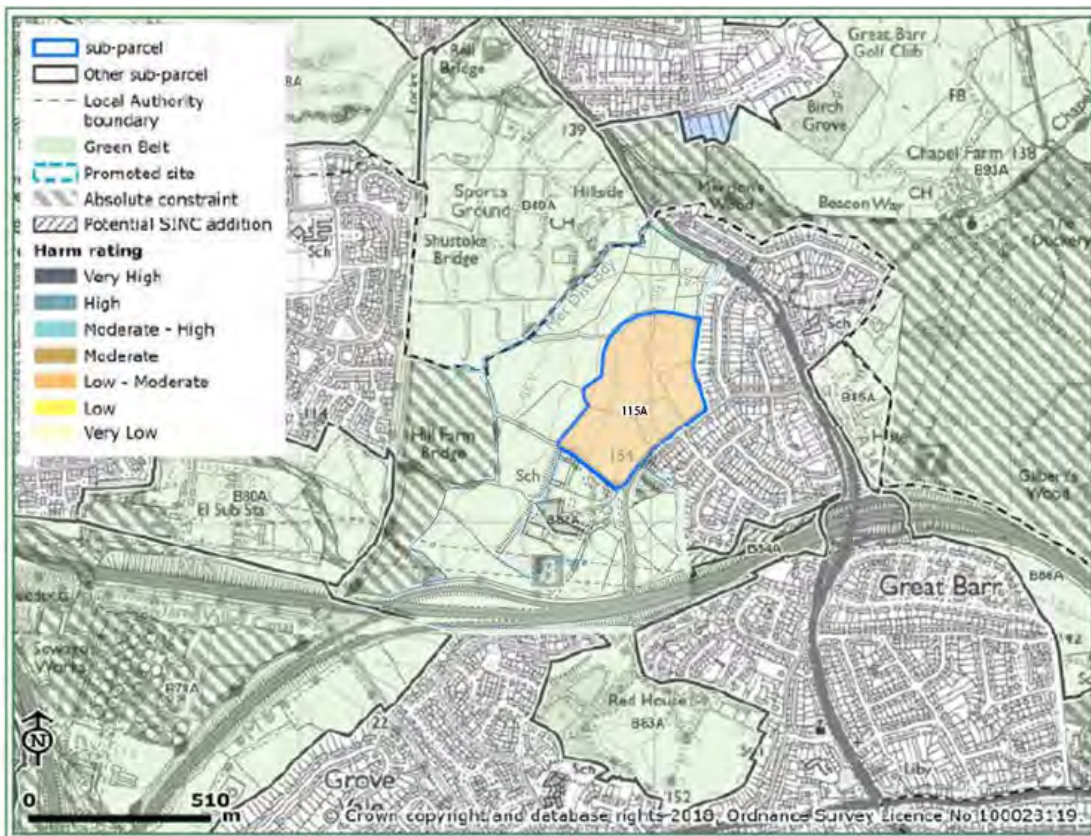
Scenario	Size (ha)	Rating
115A Release of any land immediately west of Wilderness Lane	12.84	Low - Moderate

Ref: 115A (Housing)

The sub parcel has a strong connection with the adjacent urban area, and would form a logical extension to the urban form, whilst maintaining a distinct area of open land, in conjunction with the university sports ground that lies to the north west. Comprehensive design of the Green Infrastructure on land west of the sub parcel would strengthen the boundary and distinction between the urban area and the Green Belt land and could reinforce the visual separation between Birmingham and Walsall.

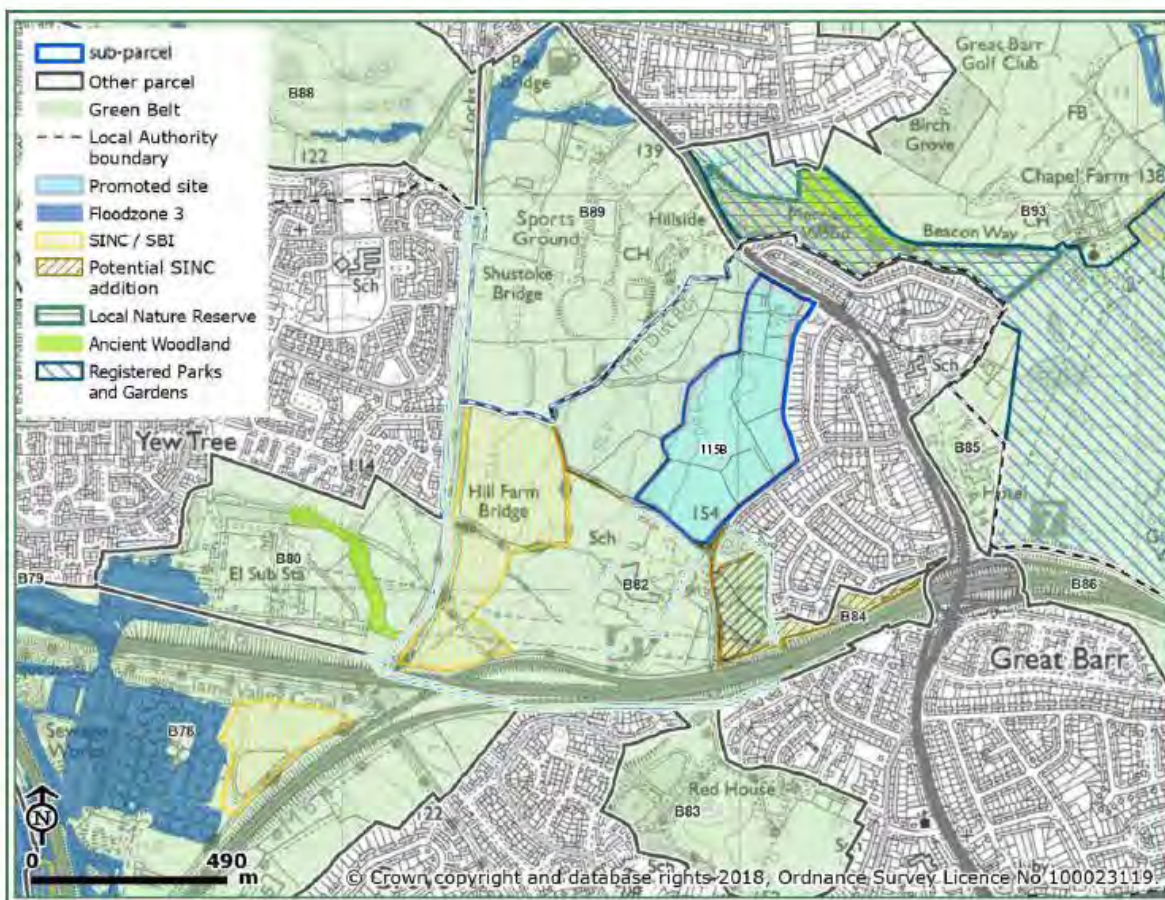
Release of this sub parcel of land would not weaken the settlement gap, and would not increase isolation of Green Belt land to the south east (B83A and B84A).

Assessment of Harm From Release of Land within Sub-Parcel
Promoted site sub-parcel 115A



Parcel Ref B81 - Wilderness Lane
 Promoted site sub-parcel 115B

Sub-Parcel 115B Size: 16.74ha



Sub-Parcel Description

Promoted site sub-parcel 115B

The sub-parcel comprises the eastern part of area B81 and this area makes a weak contribution to maintaining the separation of Walsall and Birmingham, as the sub parcel is largely contained by the existing housing at Great Barr and would not narrow the gap between the separate settlements. The sub parcel makes a moderate contribution to preventing the sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The sub-parcel is contained to the north, east and south by the settlement edge of Great Barr, forming part of the West Midlands conurbation. Sub-parcel 115B includes additional land north of the sub parcel 115A, including land for a park and ride. Whilst the extent of build development is greater than with 115A, it is still contained to the north by existing housing at Merrions Close, north of Birmingham Road, and would not extend built development in Birmingham, any further west than this existing housing. The Q3 academy lies to the south with a mix of buildings an open land, and woodland and the M6 motorway beyond that to the south.



View from within the sub-parcel towards properties off Wilderness Lane

Assessment of Parcel Contribution to Green Belt Purposes (as derived from Stage 1 study)

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent to the large built-up area. It is to a large extent contained by urban development, but retains some openness and some relationship with the wider open land. Much of the eastern part of the parcel is wrapped around by existing housing.	Moderate
P2: Preventing the merging of neighbouring towns	The land forms an open area but development beyond the parcel has compromised the sense of distinction. Parts of the parcel make very little contribution to the separate identity of settlements.	Moderate
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms), and has a stronger relationship with the urban area than with the wider countryside (ie it is contained in some way by urbanising and or other features).	Moderate
P4: Preserve the setting and special character of historic towns	Land does not form part of the setting of a historic town.	Weak/No Contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Assessment of Harm From Release of Land within Sub-Parcel

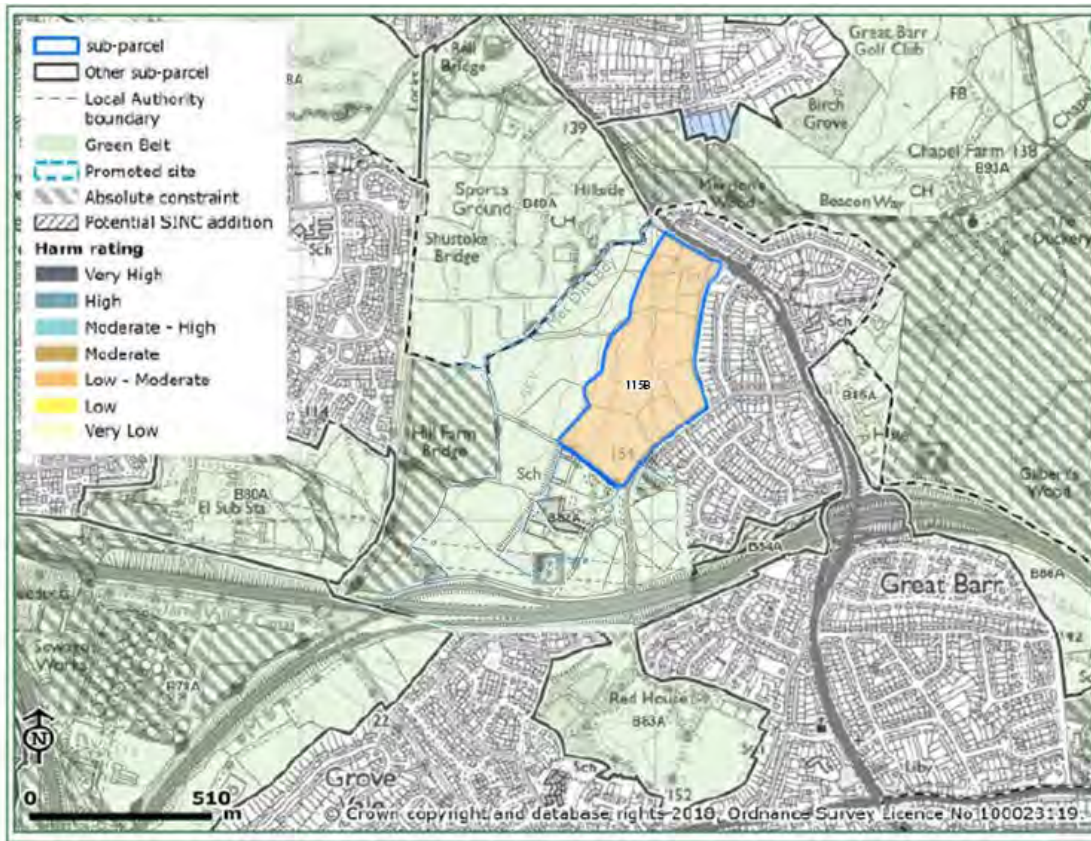
Scenario	Size (ha)	Rating
115B Release of any land immediately west of Wilderness Lane and north to Birmingham Road	16.74	Low - Moderate

Ref: 115B (Housing)

The sub parcel has a strong connection with the adjacent urban area, and would form a logical extension to the urban form, whilst maintaining a distinct area of open land, in conjunction with the university sports ground that lies to the north west. Comprehensive design of the Green Infrastructure on land west of the sub parcel would strengthen the boundary and distinction between the urban area and the Green Belt land and could reinforce the visual separation between Birmingham and Walsall.

Release of this sub parcel of land would not weaken the settlement gap, and would not increase isolation of Green Belt land to the south east (B83A and B84A).

Assessment of Harm From Release of Land within Sub-Parcel
Promoted site sub-parcel 115B



Appendix 3: Heritage Technical Note (September 2021)

HERITAGE TECHNICAL NOTE

**LAND OFF BIRMINGHAM ROAD
GREAT BARR**

**PREPARED BY LANPRO SERVICES
ON BEHALF OF
HIMOR**

September 2021



Planning + Development | Design Studio | Archaeology + Heritage

Project Reference: 1902/02

Document Prepared by: Emily Mercer BA MSc MCifA

Revision	Reason for Update	Document Updated

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Appendix 1: Gazetteer of heritage assets

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Figure 1. The study site and search area with the location of NHLE and HER data

Figure 2. Aerial view of the study site (Google 2020)

Figure 3. Aerial view of the potential medieval moated site (MBL2711)

Figure 4: LiDAR data of the study site

Figure 5: Tithe map of Aldridge (1839-40)

Summary

Lanpro was commissioned by HIMOR to produce a heritage technical note of land off Birmingham Road, Great Barr to inform the promotion of the study site through the draft Black Country Plan. It draws together the available archaeological, historical, topographic and land-use information in order to clarify the heritage significance and archaeological potential of the study site. This has been further informed by evaluation fieldwork, in the form of a geophysical survey and targeted trial trenching.

It has been established that there are no designated archaeological assets within the study site and there will be no change to the setting and significance to those within the surrounding 500m study area.

A potential for non-designated archaeological sub-surface remains has been established of possible prehistoric and medieval origin. Archaeological evidence for potential prehistoric activity lies within the south of the study site, seen in the results of a geophysical survey and suggested by the results recorded during the targeted trial trenching. In close proximity is the former location of cropmarks which, although undated, appear to include a possible enclosure. On the east of the study site the archaeological trial trenching located fragmentary archaeological sub-surface remains indicating a probable structure with associated cobbled yard surface. No evidence of this was seen in the geophysical survey but documentary evidence, aerial images and historic landscape features suggest a possible medieval moated site.

Both of the fields incorporating the non-designated archaeological sub-surface remains of prehistoric and medieval potential are proposed for preservation and enhancement due to their historic and ecological interests.

The archaeological remains identified as a result of the evaluation fieldwork are considered to be of local significance. Furthermore, there is generally a low potential for the discovery of any sub-surface archaeological remains of significance, i.e. non-agricultural origin, dating to all other archaeological periods. The significance of any remains within the study site would derive from their archaeological interest and information that they would contain relating to past land use. The nature of archaeological remains would suggest that any further discoveries within the study site would be of no greater than local importance.

The extant field system within the study site is considered to be a rare survival, on a local level, of a possible medieval or early post-medieval landscape resulting from assarting. However, with the exception of the potential moated site which may be associated with the configuration of the boundaries in the south-east of the study site, there has been no archaeological evidence recovered from the evaluation fieldwork that relates to or is contemporary with the field system. Both of the options for proposed development seek to retain and preserve the hedgerows.

At present, there is no suggestion that the study site contains archaeological remains greater than local importance and that there are no archaeological constraints to the promotion and deliverability of the study site.

1 INTRODUCTION

- 1.1 This heritage technical note of land off Birmingham Road, Great Barr (the 'study site') has been prepared by Lanpro Services Limited on behalf of HIMOR. It provides a summary of the heritage resource and archaeological potential, together with an assessment of the significance of the study site associated with the promotion of the study site through the draft Black Country Plan.
- 1.2 The following note has been informed by the *Land at Great Barr, Sandwell Archaeology and Heritage Assessment* (BSA Heritage 2014), information from the Sandwell and Walsall Historic Environment Records (HER) and the National Heritage List for England (NHLE) for the study site and surrounding 500m study area (Figure 1), a geophysical survey (Sumo, 2020) and the results of a programme of targeted archaeological trial trenching (Trent and Peak Archaeology 2021).
- 1.3 During the drafting of the Black Country Plan, the study site has been proposed to be designated as a Site of Nature Conservation (SINC) which identified that the hedgerows are part of an historic landscape. In heritage terms, in accordance with the Hedgerow Regulations Act 1997, a hedgerow is defined as a row of bushes, with or without trees, which forms a boundary between common land, green, agricultural land, forestry, pasture and woodland. It does not apply to garden hedges, even when they border a garden and arable land.
- 1.4 Using the above available information together with historic maps and other online resources, this document provides an assessment of the potential for the survival of archaeological remains and their significance within the study site, together with potential impacts.

2 LEGISLATION, POLICY AND GUIDANCE

- 2.1 In considering the promotion of the study site for allocation for development, the local planning authority will, in terms of heritage, be guided by current legislation, the policy framework set by government planning policy, and by other material considerations.

Current Legislation

- 2.1 The applicable legislative framework is summarised as follows:
- Ancient Monuments and Archaeological Areas Act (AMAAA) 1979;
 - Planning (Listed Buildings and Conservation Areas) (P(LBCA)) Act 1990
- 2.2 The AMAAA largely relates to Scheduled Monuments (SMs) and designated archaeological areas, detailing in particular what can and cannot be undertaken on archaeological grounds.
- 2.3 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act) provides for the protection of listed buildings and Conservation Areas and is largely expressed in the

planning process through policies in regional and local planning guidance, as outlined below. This act is the primary legislative instrument addressing the treatment of listed buildings and Conservation Areas through the planning process.

- 2.4 Section 66 of the 1990 Act states that '*...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*'.
- 2.5 Section 72 then adds that '*...with respect to any buildings or other land in a Conservation Area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'.
- 2.6 As far as Section 72 is concerned, it has previously been established by the Courts that development which does not detract from the character or appearance of a Conservation Area is deemed to be in accordance with the legislation. In other words, there is no statutory requirement to actively 'enhance'.
- 2.7 The Hedgerow Regulations 1997, made under section 97 of the Environment Act 1995 set out criteria that must be used in determining which hedgerows are important. Regulation 8(4) indicates that a hedgerow is important if:
- a) It has been in existence for 30 years or more; and*
 - b) It satisfies at least one of the Criteria set out in Part II of Schedule 1 to the Regulations.*
- 2.8 Hedgerows of archaeological and historical importance are identified by the Criteria in Paragraphs 1 to 5 of Part II of Schedule 1 of the Regulations:

Schedule 1

Additional Criteria for Determining 'Important' Hedgerows

Part II

Criteria

Archaeology and History

Paragraph 1. *The hedgerow marks the boundary, or part boundary, of at least one historic parish or township; and for this purpose 'historic' means existing before 1850.*

Paragraph 2. *The hedgerow incorporates an archaeological feature which is:*

- a) Included in the schedule of monuments compiled by the Secretary of State under section 1 (schedule of monuments) of the Ancient Monuments and Archaeological Areas Act 1979; or*

b) Recorded at the relevant date in a Sites and Monuments Record.

Paragraph 3. *The hedgerow:*

a) Is situated wholly or partly within an archaeological site included or recorded as mentioned in paragraph 2 on land adjacent to and associated with such a site; and

b) Is associated with any monument or feature on that site.

Paragraph 4. *The hedgerow:*

a) Marks the boundary of a pre-1600 AD estate or manor recorded at the relevant date in a Sites and Monuments Record or in a document held at that date at a Record Office; or

b) Is visibly related to any building or feature of such an estate or manor.

Paragraph 5. *The hedgerow:*

a) Is recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure Acts; or

b) Is part of, or visibly related to, any building or other feature associated with such a system, and that system:

1) Is substantially complete; or

2) Is of a pattern which is recorded in a document prepared before the 1990 Town and Country Planning Act, for the purposes of development control within the authority's area, as a key landscape characteristic.

2.9 Several of the Criteria refer to records made before 'the relevant date', that is before the Regulations were made on 24th March 1997.

2.10 Further detail and guidance relating to the identification and documentation of archaeologically and historically important hedgerows is provided by The Hedgerow Regulations 1997: A Guide to the Law and Good Practice (Department of the Environment).

2.11 Additionally, the interpretation of Schedule 1 Part II, Paragraph 5 has been defined by a Judicial Review Case (Flintshire County Council v NAW and Mr J T Morris). Based on the outcome of this case, the Department for Environment, Food and Rural Affairs (DEFRA) issued the following amendment:

Amendment of the Hedgerows Regulations 1997: A Guide to the Law and Good Practice (page 27)

Paragraph 5. *The hedgerow:*

a) Is recorded in a document held at the relevant date (24th March 1997) at a Record Office as an integral part of a field system pre-dating the Inclosure Acts; or

b) Is part of, or visibly related to, any building or other feature associated with such a system, and that system:

i) Is substantially complete; or

ii) Is of a pattern which is recorded in a document prepared before the relevant date (24th March 1997) by a local planning authority, within the meaning of the Town and Country Planning Act 1990, for the purposes of development control within the authority's area, as a key landscape characteristic.

7.22 The phrase 'pre-dating the Inclosure Acts' should be taken to mean before 1845 (whether or not Inclosure Acts exist for the area in question), that being the earliest of the Acts known by the collective title given by the Short Titles Act 1896.

7.23 Under paragraph 5(a) a hedgerow is 'important' if it was recorded as of 24th March 1997 in a Record Office document as forming an integral part of the pre- 1845 field system. The completeness of the field pattern at the present date is irrelevant. A hedgerow so recorded would still be important if it is now the only remaining part of the pre-1845 field system.

7.23a Under paragraph 5(b)(i), a hedgerow is 'important' only if it is part of, or visibly related to, an existing building or feature associated with a pre-1845 field system, and that system remains substantially complete. This means the field system must still be discernible.

7.23b Under paragraph 5(b)(ii), a hedgerow is 'important' only if it is part of, or visibly related to, an existing building or feature associated with a pre-1845 field system that was recorded by the local planning authority before 24th March 1997 as 'a key landscape characteristic' for the purposes of the 1990 Act.

National Planning Policy Framework

2.12 Section 16 of the National Planning Policy Framework (NPPF) (revised July 2021), entitled 'Conserving and enhancing the historic environment' provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets.

2.13 Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment, and
- Conservation of England's heritage assets in a manner appropriate to their significance

2.14 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 194 states that planning decisions should be based on the significance of the heritage asset, and that the level of detail supplied by an applicant should be proportionate to the importance of

the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.

- 2.15 A Heritage Asset is defined in Annex 2 of the NPPF as: *'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*
- 2.16 Annex 2 also defines 'Archaeological Interest' as a heritage asset which holds or potentially could hold, evidence of past human activity worthy of expert investigation at some point. Heritage Assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.
- 2.17 A Designated Heritage Asset comprises a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.
- 2.18 Significance is defined as: *'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.'*
- 2.19 In short, government policy provides a framework which:
- Protects nationally important designated Heritage Assets (which include World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas),
 - Protects the settings of such designations,
 - In appropriate circumstances seeks adequate information (from desk-based assessment and field evaluation where necessary) to enable informed decisions,
 - Provides for the excavation and investigation of sites not significant enough to merit in situ preservation.

Planning Practice Guidance

- 2.20 The Planning Practice Guidance is a web-based resource which is to be used in conjunction with the NPPF. It is aimed at planning professionals and prescribes best practice within the planning sector. The relevant section is entitled *'Conserving and enhancing the historic environment'*. The guidance given in this section sets out the best practice to applying government policy in the NPPF.

Professional Guidance

- 2.21 The Chartered Institute for Archaeologists (CIfA) *Standard and Guidance for Historic Environment Desk-based Assessment* (2014, updated Oct. 2020) provides guidelines and recommendations for best practice in undertaking archaeological desk-based research and assessment.
- 2.22 The Historic England publication *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment* (2015) outlines a seven-stage process for the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development.
- 2.23 In order to understand the nature, extent and level of significance the note advocates considering the four types of heritage value an asset may hold, as identified in Conservation Principles (English Heritage 2008): aesthetic, communal, historic and evidential. Significance results from a combination of any, some or all of the values.
- 2.24 The Historic England publication *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets* (2017) recognises that whilst setting is not a heritage asset, elements of a setting ‘*may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*’ (para. 4). Setting is described as being distinct to curtilage, character and context. This guidance also notes that the contribution of setting to the significance of a heritage asset is often expressed by reference to views, although the importance of setting lies in what it contributes to the significance of the heritage asset, and this can be influenced by a number of other factors.
- 2.25 The Historic England advice note, *Statement of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12* (2019), brings together all of the above guidance in an analysis of an appropriate approach for applicants for heritage and other consents in providing an understanding of the significance of heritage assets in line with the NPPF. This is aimed at providing assistance for owners, applicants, local planning authorities, planning and other consultants in the implementation of not only the guidance but also historic environment legislation and policy.

3 DESIGNATED AND NON-DESIGNATED ARCHAEOLOGICAL ASSETS

Information Sources

- 3.1 A gazetteer of all records held on the Sandwell and Walsall HER and the Historic England National Heritage List for England (NHLE) for within a 500m search area is provided in Appendix 1, and their locations marked on a plan on Figure 1.
- 3.2 In order to update the findings of the *Land at Great Barr, Sandwell Archaeology and Heritage Assessment* (BSA Heritage 2014), on-line repositories for historical maps, plans and relevant

documentary sources were consulted in accordance with the guidelines laid down by the ClfA (2020).

Designated Archaeological Assets

- 3.3 Data obtained from Historic England and HER confirms that there are no designated archaeological assets (e.g. Scheduled Monuments) within the study site.
- 3.4 There are five designated heritage assets, four of which are Grade II listed buildings, within the surrounding 500m study area (Appendix 1 and Figure 1) and an area to the north of the study site that is a Registered Park and Garden and Conservation Area for Great Barr. These heritage assets are not considered to be sensitive to future development on the study site due to intervening buildings, vegetation or topography. Therefore, in accordance with Historic England guidance (2017), these have been scoped out of further assessment.

Non-designated Archaeological Assets

- 3.5 A number of non-designated archaeological assets were recorded on the HER within or bordering the site and these are recorded in Appendix 1 and plotted on Figure 1. These include:
- MBL2608 (SMR1721) a Neolithic broken polished stone axe findspot in the north-east of the site;
 - MBL2711 (SMR2824) a field within the south-east side of the site wherein a probable medieval moated site is located, from evidence obtained from potential cropmarks on aerial photographs and fieldnames (Great and Little Moat Piece recorded on the 1839-40 tithe map);
 - MBL nos 2969, 2971-2973, 3090 (SMR nos. 4262, 4264-6, 6424) all referring to ancient hedgerows;
 - MBL2994 (SMR4757) cropmarks on aerial photographs that appears to be contemporary with the field boundaries;
 - MBL3075 (SMR6355) cropmarks on aerial photographs relating to a probable former watercourse;
 - MBL3202 (SMR9083) undated coins;
 - MBL1302 (SMR10273) Peak House Farm, a post-medieval farmstead;
 - Sandwell HER has also outlined the site and land to its south-west as an area of archaeological potential.
- 3.6 In addition, a cropmark was identified from aerial photographs in the Archaeology and Heritage assessment (BSA Heritage 2014) within the centre of the site that may relate to a prehistoric enclosure.

- 3.7 The HER contains 35 records relating to archaeological remains, buildings, finds or investigations within the 500m search area. These are broken down by period as follows. Some records cover more than one period:-

Period	Within Study Site	Within Search Area
Prehistoric	1	0
Roman	0	0
Medieval	2	4
Post-medieval	0	6
Industrial/Modern	0	5
Undated	5	8

- 3.8 There are five archaeological investigations recorded on the HER within the 500m surroundings, consisting of mainly watching briefs (MBL5550, EBL712, EBL734, EBL793) and a survey (EBL668).
- 3.9 More recently, for the purposes of the promotion of the study site, a programme of archaeological fieldwork has been undertaken to further assess the archaeological potential and significance of the study site.
- 3.10 A detailed magnetometer survey was carried out in late autumn 2020 (Sumo 2020). It was concluded that no features of definite archaeological interest were identified in the results. However, a number of linear and curvilinear responses were identified although of uncertain origin. One such curvilinear response did appear to correspond with an undated cropmark feature which may have been of archaeological or natural origin. Two former field boundaries were seen in the data, together with several potential former field boundaries, whilst evidence for former ridge and furrow was also evident across the study site. The remaining magnetic responses identified were either of natural origin or modern, including land drains and an underground service.
- 3.11 The results of the geophysical survey were ground-truthed with subsequent targeted trial trenches in May 2021 (TPA 2021). In addition, the cropmark identified in the BSA Archaeology and Heritage assessment (2014) as being of potential prehistoric origin was also investigated (Trench 6). This comprised a total of 16 trenches in which seven were found to contain archaeological features and deposits:
- Trench 5: three furrows of post-medieval date, an undated pit and narrow gully,
 - Trench 7: probable former field boundary,
 - Trench 10: two 19th-20th century ditches which were shown to curve slightly in the geophysical survey data and suggestive of a boundary or driveway,

- Trench 11: similar feature to the ditches in Trench 10,
- Trench 12: large ditch found that corresponded with the geophysical survey results, with a smaller linear gully and a pit to the west. A distinct lack of finds indicated a probable early origin to the features, but all were of unknown function and there are potentially additional archaeological features in the vicinity,
- Trenches 15 and 16: these two trenches targeted the house platform within the potentially moated site. The archaeological remains were shown to be heavily truncated due to subsequent agricultural activity. A substantial cobbled surface was revealed in Trench 15 together with a beam slot that extended beyond the trench and interpreted as belonging to a structure. A series of ditch re-cuts were revealed in Trench 16 that appeared to be earlier features that had been filled and levelled with redeposited clays in the 19th and 20th centuries. Environmental samples retrieved from this area indicated cereals and cultivated legumes of medieval origin.

3.12 No evidence of the cropmark of potential prehistoric origin was found in Trench 6 or within its vicinity in Trenches 7 and 8.

3.13 Elsewhere, a large number of wide field drains were revealed within the trenches, some of which measure up to a metre wide and a metre deep and corresponded with anomalies in the geophysical survey data.

3.14 However, there was not always close correspondence between the geophysical anomalies and the archaeological features recorded in the trenches. There were numerous instances where no archaeological features were found in areas where geophysical anomalies were recorded (for example, Trenches 1, 4, 6, 13, and 14), whilst in other cases, features were found during trenching which were not observed in the geophysical survey data (for example, Trenches 12, 15 and 16).

4 SUMMARY OF ARCHAEOLOGICAL POTENTIAL

4.1 The previous assessment carried out in 2014 (BSA Heritage) assessed the archaeological potential of the study site using evidence provided in the Sandwell and Walsall HER, the National Heritage List for England, English Heritage aerial photographic archive and documentary sources at the Staffordshire Record Office. The baseline information is still largely relevant, although the HER data has been updated for the purposes of this assessment (Appendix 1 and Figure 1).

4.2 The earliest evidence for activity lies within the north of the study site, MBL2608 (SMR1721), and comprises the find of a broken polished stone axe dating to the Neolithic (Figure 1). Further potential for activity recorded in the HER and dating to the prehistoric is to the south of the study site MBL2993 (SMR4756), which notes a possible enclosure seen on aerial images. The HER notes that this feature now lies under a running track, presumably part of

the Q3 Academy, and there is no information on any archaeological investigations completed prior to its construction.

- 4.3 The geophysical survey (Sumo 2020) did identify a number of linear and curvilinear anomalies that may have been associated with prehistoric activity, such as tracks, enclosures and field systems across the study site. These were targeted with trial trenching (TPA 2021) in order to ascertain their origin and any possible dating evidence.
- 4.4 Features recorded in Trench 12 were noted to be distinctly different in character to the features found elsewhere across the study site. No dateable finds were recovered which suggests a date probably earlier than medieval or post-medieval, although a piece of burnt bone was recovered from a sample. It has also been suggested that there are similar features within the vicinity of Trench 12. Given the location of these features within close proximity to cropmarks of potential early date (MBL2993) it is possible there is prehistoric potential in the south end of the study site.
- 4.5 Other evidence for archaeological remains within the study site (BSA Heritage 2014) includes that for a possible medieval moat, MBL2711 (SMR2824), contained in a single field in the east (Figure 1). This is based partly on fieldname evidence as two fields are recorded as Great and Little Moat Piece to its north-east. The field is believed to reflect a medieval enclosure with an extant linear pond running along its north boundary believed to be the remaining vestige of a medieval moat or a fishpond. Other depressions and linear features have been noted within the field during site visits and on aerial imagery (Figure 3), with a postulated house platform measuring 80m x 40m. LiDAR data for this area also shows the variation in topography across the site reminiscent of structural remains (Figure 4).
- 4.6 The geophysical survey (Sumo 2020) did not show any obvious features over the area of the potential moat. Nevertheless, given the archaeological evidence for remains, two trial trenches were excavated to investigate the potential for a dwelling (Trenches 15 and 16). The results indicated the probable presence of a structure associated with a cobbled surface. The trenching results were not conclusive as to whether the site was a medieval moated manor or farmstead, for instance.

5 HISTORIC LANDSCAPE CHARACTER

- 5.1 An historic landscape characterisation (HLC) project for the Black Country (2009) was funded by English Heritage as part of the National Programme of Historic Landscape Characterisation (HLC) in order to understand the current landscape in terms of its historical development. This included the study site which is within the *Newton, Hamstead and Great Barr Character Area (SD02)* described as *“largely a residential area comprising almost exclusively 20th century housing....However, the area also includes significant areas of fields which continue to the north beyond the modern Sandwell boundary.”*

- 5.2 The oldest landscape within the character area SD02 is described as those fields in the north-west, that is the location of the site, which continues into the *Barr Beacon and Aldridge Fields Character Area (WLO9)*. The fields are described as being a result of an enclosed field system with the earliest having resulted from piecemeal enclosure in the late medieval and early post-medieval periods. These differ from those enclosed in the late 18th/early 19th century within the surroundings “*which exhibit straight roads and boundaries typical of parliamentary enclosure*”.
- 5.3 The project will have also been informed by the Sandwell HER data in which a number of the records for the study site and search area refer to historic or ancient hedgerows based on an ecological survey undertaken by the Urban Wildlife Trust (nd). Within or bordering the study site, the HER records hedgerows which were defined as ‘ancient’ (medieval or early post-medieval) based on their flora (MBL2969, MBL2971-2973 and MBL3090). The survey also concluded that the hedgerows may be woodland remnants, suggesting the field system is based on a process known as ‘assarting’, carving each field from woodland. Ditches and banks were also noted in places (MBL2971 and MBL3090). Beyond the study site to the west, the HER records an ancient wood (MBL2988) and hedgerow (MBL3901).
- 5.4 The extant field boundaries within the study site were recorded in detail on the Aldridge tithe map of 1839-40 (Figure 5), although three of the internal boundaries have been removed since. Details from the tithe apportionment (dating to 1841) show that the whole of the site is owned by Sir Edward Dollman Scott of Barr Hall. The field arrangement is of an irregular form characteristic of early enclosure and possible ‘assarting’. Great Barr was certainly settled and farmed by the medieval period but Peak House Farm (recorded as ‘Pig House Farm’ on 19th century mapping), to the north-east of the study site (MBL1302), is post-medieval in origin.
- 5.5 The Birmingham and the Black Country Local Sites Assessment Report (2018) undertook an ecological survey to inform the emerging Black Country Plan. The report refers to ‘*a field pattern of small and irregular fields thought to date back to at least 1750*’ within the study site and makes reference to the HLC character area descriptions (discussed above, para 6.1). It scores ‘High’ in the criteria adopted, which is assumed to be attributable to the age of the historic hedgerows as part of an historic landscape surviving within an area dominated by urban development. The survey details note that 17 hedgerows have been recorded in varying conditions with all but one (assigned to the 1930s) having been established for over 100 years.
- 5.6 The ‘1750’ reference is not made clear, but it does state that historical mapping exists from at least the late 18th century onwards for the site. However, the Archaeology and Heritage assessment (BSA Heritage 2014) states that whilst documentary evidence for the site was consulted at the Staffordshire Record Office, which holds historic maps for the site including Wates’ map of 1775, the earliest detailed map available to show the field boundaries was the Aldridge tithe map (Figure 5). Therefore, it is presumed that the 1750 reference may

relate to the earliest recorded date for parliamentary enclosure in the area, which these hedgerows do not appear to relate to, and hence provides an approximate preceding date.

- 5.7 The date of the tithe map (1839-40) is crucial to the initial assessment of the archaeological importance of the hedgerows, as per the Hedgerows Act 1997 which uses a cut-off date of 1850. There is also a possible outcome that some of the hedgerows may be considered to be associated with the moated site in line with the criteria in the Hedgerows Act 1997.

6 ARCHAEOLOGICAL POTENTIAL AND SIGNIFICANCE

- 6.1 Information from the previous assessment (BSA Heritage 2014), informed by the HER, together with the HLC and ecological survey has identified that the study site has the potential for archaeological remains. The programme of evaluation fieldwork undertaken in the form of a site-wide geophysical survey (Sumo 2020) and targeted trial trenching (TPA 2021) has aided in providing a better understanding and appreciation of this potential, together with the significance of the archaeological resource.
- 6.2 It is recognised that not all parts of an archaeological asset will necessarily be of equal significance. In some cases, certain elements could accommodate change without affecting the significance of the asset. Change is only considered harmful if it erodes an asset's significance. Understanding the significance of any archaeological assets affected and any contribution made by their setting (paragraph 194, NPPF 2021) is therefore fundamental to understanding the scope for and acceptability of change.
- 6.3 The earliest activity identified within the study site dates to the prehistoric. A Neolithic stone axe findspot is located within the north of the study site. To the south, features of potential early date, possibly prehistoric, were recorded in Trench 12 (TPA 2021) in close proximity to an area of cropmarks (the site has since been developed) recorded on the HER, including a feature reminiscent of a prehistoric enclosure. Further investigation would be required to investigate the extent of the features in this area, as well as to more accurately define their origin and date. However, the features are unlikely to be of greater than local significance.
- 6.4 In the south-east of the study site the potential for a medieval moated site had been suggested by field name and aerial photographic evidence (Figure 3), together with the location of the linear pond aligning the field boundary and general uneven surface within the field. The geophysical survey did not reveal any features indicating the presence of a dwelling within the field, although the use of an alternative technique, namely a resistance meter survey, would have been more appropriate to detect structural remains. The trial trenching revealed features, however, relating to a structure and associated yard surface but were inconclusive as to whether this may have been a simple farmstead or a manor house.
- 6.5 The trial trenching did also show the archaeological remains to have been truncated by post-medieval cultivation and, therefore, only fragmentary survival is anticipated. On this basis, it

is likely that any remains will be of no greater than local or regional significance should they be found to contribute to the corpus of information in the regional research agenda.

- 6.6 Due to historic and ecological interests, both the field containing Trench 12 and the area of prehistoric potential together with that containing Trenches 15 and 16 with the potential for a moated site have been identified for preservation and enhancement in the Vision Document (HIMOR 2021).
- 6.7 Generally, across the remainder of the study site, the evaluation fieldwork showed any archaeological activity recovered to relate to post-medieval (mainly late 18th and 19th century) and modern agricultural activity. Many of the features identified in the geophysical survey were found to relate to agricultural features, including the substantial drains seen in both the survey results and trial trenching. These are considered to be of negligible significance.
- 6.8 Aside from the areas of prehistoric and medieval potential discussed above, it has been assessed that there is generally a low potential for the discovery of any sub-surface archaeological remains of significance, i.e. non-agricultural origin, dating to all other archaeological periods. The significance of any remains within the study site would derive from their archaeological interest and information that they would contain relating to past land use. The nature of archaeological remains would suggest that any archaeology within the study site would be of no greater than local importance and should not preclude development of the study site.
- 6.9 The largely intact field system within the study site is considered to be a rare survival of a possible medieval or early post-medieval landscape within this part of the West Midlands conurbation and, therefore, it is considered to be of local significance. However, with the exception of the potential moated site which may be associated with the enclosure in the south-east of the study site, there has been no archaeological evidence recovered from the evaluation fieldwork that relates to the field system.
- 6.10 The importance of the hedgerows, in terms of their historic and ecological value as well as their group value as a field system, has been considered in the Vision Document for the study site (ibid). Consequently, the concept options for development seek to retain and preserve the hedgerows.

7 CONCLUSIONS

- 7.1 This heritage technical note of land off Birmingham Road, Great Barr draws together the available archaeological, historical, topographic and land-use information in order to clarify the heritage significance and archaeological potential of the study site. This has been further informed by evaluation fieldwork, in the form of a geophysical survey and targeted trial trenching.

- 7.2 It has been established that there are no designated archaeological assets within the study site and there will be no change to the setting and significance to those within the surrounding 500m study area.
- 7.3 A potential for non-designated archaeological sub-surface remains has been established of possible prehistoric and medieval origin. Archaeological evidence for potential prehistoric activity lies within the south of the study site, seen in the results of a geophysical survey and recorded during the targeted trial trenching. In close proximity is the former location of cropmarks which, although undated, appear to include a possible enclosure. On the east of the study site the archaeological trial trenching located fragmentary archaeological sub-surface remains indicating a probable structure with associated cobbled yard surface. No evidence of this was seen in the geophysical survey but documentary evidence, aerial images and a linear pond along an historic field boundary indicated a possible medieval moated site. This portion of the study site is proposed for preservation and enhancement due to its historic and ecological interest. Due to historic and ecological interests, both of these areas of potential non-designated archaeological sub-surface remains will remain undeveloped.
- 7.4 The archaeological remains identified as a result of the evaluation fieldwork are considered to be of local significance. Furthermore, it has been assessed that there is generally a low potential for the discovery of any sub-surface archaeological remains of significance, i.e. non-agricultural origin, dating to all other archaeological periods. The significance of any remains within the study site would derive from their archaeological interest and information that they would contain relating to past land use. The nature of archaeological remains would suggest that any archaeology within the study site would be of no greater than local importance.
- 7.5 The extant field system within the study site is considered to be a rare survival, on a local level, of a possible medieval or early post-medieval landscape resulting from assarting. However, with the exception of the potential moated site which may be associated with the enclosure in the south-east of the study site, there has been no archaeological evidence recovered from the evaluation fieldwork that relates to the field system. Both of the options for proposed development seek to retain and preserve the hedgerows.
- 7.6 At present, there is no suggestion that the study site contains archaeological remains greater than local importance and that there are no archaeological constraints to the promotion and deliverability of the study site.

8 REFERENCES

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Figures



Figure 2. Aerial view of the study site (Google Earth 2020)



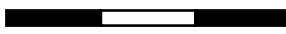

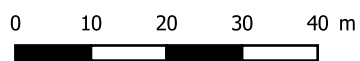
	 Study site	<p>0 50 100 150 m</p> 	 <p>Planning + Development Design Studio Archaeology + Heritage</p>
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Figure 3. Aerial view of the potential medieval moated site (MBL2711)





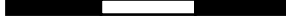

Study site



Planning + Development | Design Studio | Archaeology + Heritage



Figure 4. LiDAR data of the study site

	 Study site	0 50 100 150 m 	 Planning + Development Design Studio Archaeology + Heritage
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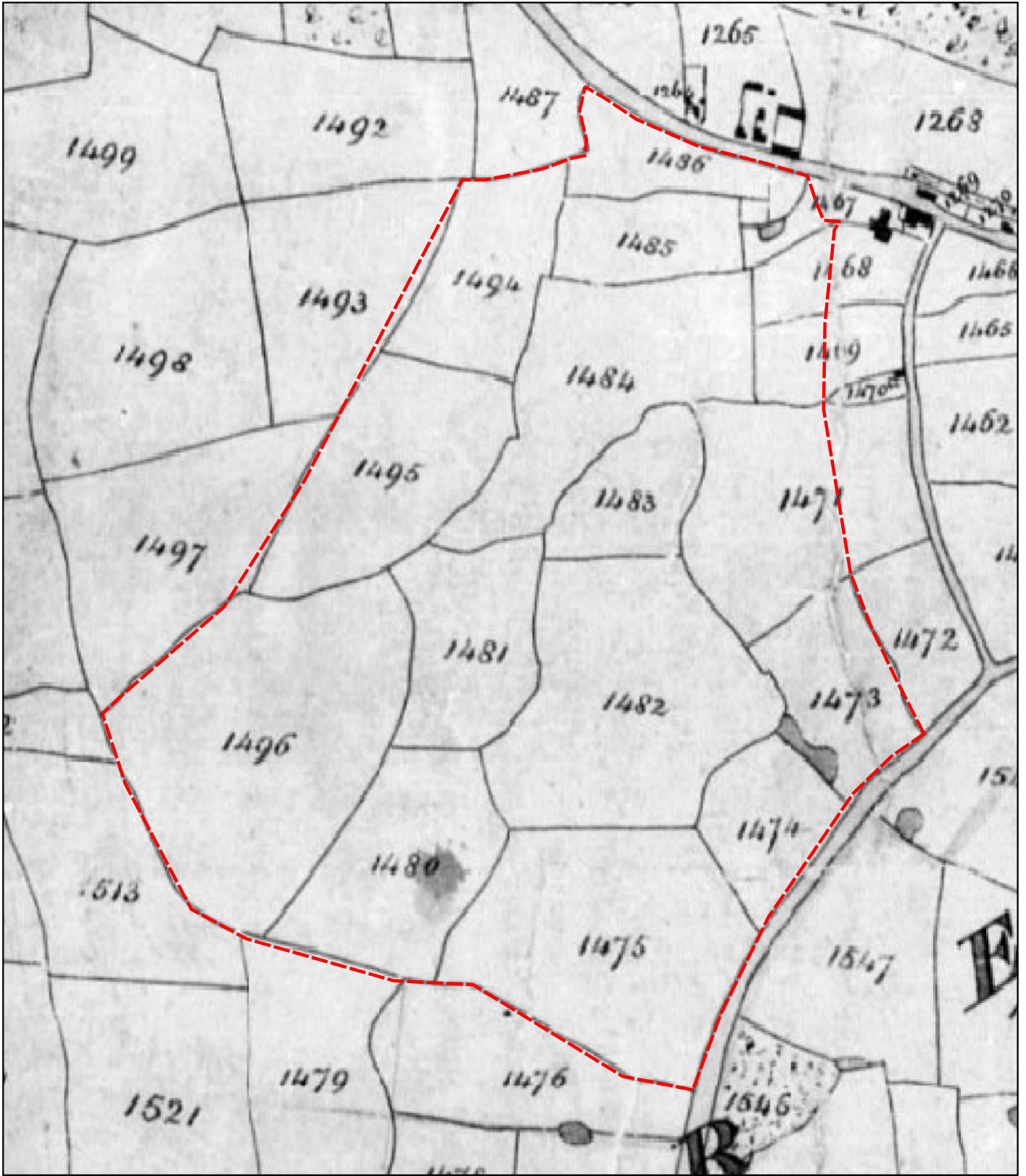


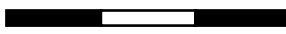



Figure 5. Tithe map of Aldridge (1839-40)

	 <p>Approx site</p>	<p>0 50 100 150 m</p> 	 <p>Planning + Development Design Studio Archaeology + Heritage</p>
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Appendix 1: Gazetteer of heritage assets

HER Ref.	Name	Description	NGR	Designation	Period
HER records:					
MBL1302 (SMR10273)	PEAK HOUSE FARM (PREVIOUSLY PIG LANE FARM), BIRMINGHAM ROAD, GREAT BARR	Pig Lane Farm marked on OS 1st edn map of 1886. Shows two parallel rectangular buildings adjacent to the road, then Pig Lane, along with a squarer building to the NW.	SP 0419 9568		Post-medieval
MBL1303 (SMR10274)	ST MARGARET'S SCHOOL, CHAPEL LANE	St Margaret's Church of England Junior, Infant and Nursery School. Marked on OS 1st edition, 1886; footprint appears to be different today suggesting building rebuilt.	SP 0445 9555		Post-medieval
MBL1488 (SMR10754)	FIELD SYSTEM; SOUTH OF WALSTEAD RD BETWEEN LAUREL ROAD AND LABURNUM ROAD	Open grassland bounded on west, south and east by housing and school and on north by Walstead Road. No evidence of mature trees around boundaries (so probably very recent). Field itself has irregular surface. Nothing as coherent as Ridge & Furrow but slight hollows/furrows in several places suggest either traces of particularly deep furrows or of field/ furlong boundaries.	SP 0303 9598		Medieval/Post-medieval
MBL1816 (SMR3952)	PARK; GREAT BARR HALL	Park of Great Barr Hall. Majority lies in Walsall but small portion at south west lies in Sandwell. MC18, developed end C18 & MC19. c100 ha. Gt Barr Hall, 1777 built for Jo Scott incorporating material from C17 house. Walled kitchen garden 100m to NE. Gothic gateway from grounds to courtyard by John Nash, c1801, demolished. C19 lodges at SW & SE extremities. Developed by Scott family over 2 centuries. Began as Shenstone-inspired 'ferme ornee' C18, developed as landscape park by Humphrey Repton around 1800, supplemented with other planting & features 3rd quarter C19. Formal terraced layout created on rising ground to E as part of St Margaret's hospital (begun first decade of C20). Park includes 'Strawberry Hill' gothick mansion, Gilbert Scott 'Chapel' and lodges, carriage drives, lakes, cascades, belts, clumps and scenic walks. Added to Register of Parks and Gardens 1986	Centred SP 0553 952	Grade II RPG - 1001202	Post-medieval
MBL2603 (SMR1643)	GREAT BARR VICARAGE, CHAPEL LANE, GREAT BARR	Vicarage. 1847 by Ewan Christian. Red brick with blue bands and voussoirs, some sandstone dressings, and steep tile roofs. Two storeys with attics. On the S side a single gabled bay projects forwards and has a timber canted bay window on the ground floor. The first floor window has a sandstone lintel and sill, pointed relieving arch, and three sashed with no glazing bars. Above is a one-light casement attic window. To the	SP 0454 9559	Grade II LB - 1215680	19th century

		right is a range which has a window of two sashed lights with no glazing bars on the ground floor and which is blind above. In the angle between the projecting bay and the left hand range is a later C19 glazed addition with French windows. To each side of the central gabled bay are tall multi-flue stacks of zig-zag plan. The door, in the left hand return wall, has a chamfered surround with pointed head and hood with carved stops, and is covered by a glazed porch.			
MBL2608 (SMR1721)	LOCATION OF NEOLITHIC AXE FOUND AT PEAK HOUSE FARM	Polished stone axe, broken at shaft end.	SP 0410 9572		Prehistoric
MBL2711 (SMR2824)	MOAT; PEAK HOUSE FARM; WILDERNESS LANE; GREAT BARR	Fields named 'Great Moat Piece' & 'Little Moat Piece' (SP041953). On Aldridge Tithe Map, field in which site lies is Hockett Meadow. Great Moat piece is field to its north-east, no certain trace of moat seen but south-west boundary of 'Great Moat Piece' is a marshy hollow, 9m wide, 0.8m deep, possible remains of north-east arm of homestead moat. Extending at right angles south-west from south end of this, but separated from it by narrow causeway, is dry depression (30m long, 6m wide, 0.6m deep) in pasture field. Surface of field very uneven. waterfilled trough aligned north-west-south-east, some 70m long, 9m wide. South-east end dammed up by spoil. Possible 1 arm of homestead moat but now no trace of any other side. Wilderness Lane: enclosure 80m X 40m, possibly a medieval moated site. Surface indications show deep wet ditch along field boundary on north-west side, curving away from it at north end. Slight depression at south end turning to north-east. parallel linear depression to south-east. Features show clearly on 1969 Aerial Photograph (51/69/030, West Bromwich survey). Under light snow cover, north-east side of enclosure is visible as linear depression, entrance gap halfway along it (1991 Aerial Photograph). Sub rectilinear, c80m x 40m. Predates surrounding field boundaries. Possible medieval moat or earlier enclosure. Rectilinear pond to north-east approximately 80 x 10m possible fishpond. Earthwork survey 12/12/91: form & dimensions suggest medieval moated site. This would be consistent with location in area of medieval enclosed fields. 2 causeways across enclosure possible original entrances. Possible sites of buildings represented by hollows. Pond probably fishpond contemporary with moat.	Centred SP 0402 9528		Medieval
MBL2811 (SMR378)	POOL HOUSE, JUNCTION OF BIRMINGHAM ROAD/ARRAN CLOSE, WEST BROMWICH	House, now offices. Possibly early 18 Century. Pebble-dashed brick with tile roof. Three storeys, five bays. Windows are boxed sashes with glazing bars. Door, in central bay, has bolection-moulded surround and shell hood of Early 18 Century type, but detailing suggests that it may be	SP 0451 9509	Grade II LB - 1077130	e. 18 th century

		replacement of Late 19 Century or Early 20 Century date. Modillion eaves. Gables coped with chimneys. Left Hand chimney has projecting stack.			
MBL2969 (SMR4262)	DARTMOUTH HIGH SCHOOL HEDGEROW	Ancient hedgerow, possible woodland relic. Cropmark	SP 0377 9525		undated
MBL2970 (SMR4263)	ANCIENT HEDGEROW (HEDGE 5); GREAT BARR	Ancient hedgerow, possibly woodland relic. Becomes double hedgerow at western edge. Contains damp ditch. Rich species, ground flora indicative of ancient woodland. Cropmark	SP 0328 9517		undated
MBL2971 (SMR4264)	HEDGEROW; near RUSHALL CANAL (HEDGE 7); GREAT BARR	Ancient hedgerow, possible woodland relic. Includes a stream running through a double hedgerow. Ground flora indicative of ancient woodland. Cropmark	SP 0342 9545		undated
MBL2972 (SMR4265)	RUSHALL CANAL HEDGEROW (HEDGE 8); GREAT BARR	Hedge 8. Ancient hedgerow, possible woodland relic. Hedgerow with ditch, becoming damp towards canal. Quite mature. Ground flora indicative of ancient woodland. Cropmark	SP 0353 9562		undated
MBL2973 (SMR4266)	ANCIENT HEDGEROW near RUSHALL CANAL	Hedge 9. Ancient hedgerow, possible woodland relic. Cropmark	SP 0365 9551		undated
MBL2988 (SMR4500)	CATTLE GRID WOOD	Ancient woodland classified as plantation. Cropmark	SP 0330 9520		Undated
MBL2993 (SMR4756)	CROPMARK SITE; WEST OF DARTMOUTH SCHOOL	Cropmark in one straight line, c170m long with possible trapezoidal enclosure attached to it, defined by straight line approximately 50m long running parallel to it and about 20m away from it, joined to it by an oblique line around 20m long. Now a running track	SP 0369 9520		undated
MBL2994 (SMR4757)	CROPMARK; N OF DARTMOUTH SCHOOL	3 lines joining existing field boundaries; 2 longest are winding and roughly parallel, each c150m long and 50m apart joined by straight line	SP 0379 9544		undated
MBL3056 (SMR596)	HILL FARM BRIDGE, BRACKENDALE DRIVE, RUSHALL CANAL, YEW TREE	Accommodation bridge over Rushall Canal. Canal opened 1847. Cast iron with brick and sandstone abutments. Single shallow segmental arch. Sides pierced in lattice pattern of saltire crosses	SP 0327 9518	Grade II LB - 1077126	Post-medieval
MBL3075 (SMR6355)	CROPMARK; NORTH OF DARTMOUTH SCHOOL; GREAT BARR	Single winding line c110m long shown on 1969 vertical Aerial Photograph	SP 0365 9530 (undated
MBL3076 (SMR6359)	SETTLEMENT; SNAILS GREEN	Later medieval settlement - 'Eventually there was a straggle of houses at Snails Green and elsewhere by the Walsall-Birmingham Rd'.	SP 0447 9488		Medieval
MBL3090 (SMR6424)	HEDGE 12; ANCIENT HEDGEROW; NR DARTMOUTH SCHOOL; GT BARR PARK	In places forms almost linear strip of woodland, esp at NE end where there are many mature oaks. SW end - fairly deep ditch & bank with running water. ground flora indicative of ancient woodland.	SP 0388 9578		Medieval

MBL3091 (SMR6425)	HEDGE 14; ANCIENT HEDGEROW; EAST OF RUSHALL CANAL; GREAT BARR PARK	Runs along east side of Rushall canal, contained mainly on an embankment. Ground flora indicative of ancient woodland	SP 0332 9559		Medieval
MBL3134 (SMR6489)	RED HOUSE PARK; WEST BROMWICH	Park established by West Brom council 1928.	SP 0388 9441		19 th – 20 th century
MBL3170 (SMR8006)	DITCHES; NR RUSHALL CANAL	Two ditches visible in fields, each 3m wide and apparently overlain by very slight plough ridges. The one aligned NW to SE is later as it cuts through NE to SW one. Both are overlain by extant field boundaries (fenced). possibly some type of drainage.	SP 0303 9498		undated
MBL3175 (SMR8011)	EARTHWORK BANK AT ST. MARGARET'S VICARAGE; CHAPEL LANE	An earthwork bank running down the eastern side of chapel lane, with a later hedgerow behind it. It may be part of the old deer park (Gt Barr) pale. A possible inner ditch line is visible in the pasture field to the SE, continuing on the same alignment as the earthwork bank which does not survive in this field. The medieval deer park was first mentioned in 1335, but as the Lord of the manor rarely lived in Great Barr until C16 it was soon divided into 6 enclosed fields, later subdivided further	SP 0459 9558		Medieval
MBL3176 (SMR8012)	AIR RAID SHELTERS; CHAPEL ST; GT BARR	Two brick built underground air raid shelters built for the school to the north. They are recorded on the modern O.S. maps at 1:1250. Tree entrances shown on OS map. Site intact 8-8-01, area overgrown but south entrance is visible set into a mound about 2m high. It is probably a long shelter with three separate entrances (as at Bilston SMR 10492) rather than separate shelters. Presumably shelter was built for adjacent school to west (St. Margaret's SMR 10274)	SP 0449 9554		20 th century
MBL3201 (SMR5722)	LAND AT 15 PEAKHOUSE ROAD, GREAT BARR	Observation of trenches for house extension 30.1.89. Sandy natural at high levels.	SP 0421 9543		undated
MBL3202 (SMR9083)	UNDATED COINS; BARONS HILL	Coins. Date unknown. Information from tenant	SP 0380 9560		undated
MBL3214 (SMR9609)	HILL FARM (SITE); N OF LONGLEAT	Now under M6. Substantial farmhouse & range of buildings to NW. Possibly the site marked as 'Grange' on map of 1775	SP 0345 9475		Post-medieval
MBL3125 (SMR9610)	HERMITS CAVE; N OF RED HOUSE PARK	Area of Woodland to NW of Pool called "Hermits Cave", also well.	SP 0371 9453		undated
MBL5550	LAND AT REAR OF 29-33 WILDERNESS LANE, GREAT BARR	Internal watching brief (C127) carried out at land to the rear of 29-33 Wilderness Lane, Great Barr. A planning condition was imposed on this site for the application involving a newbuild dwelling on the newly-formed plot at the end of aforementioned gardens. The watching brief was undertaken by the Borough Archaeologist on 29th and 30th June 2009. No archaeological features were revealed but evidence of a pit	-		undated

		1.5m wide by 0.75m deep and U-shaped had occasional fragments of concrete and rotting wood along with modern machine-made brick.			
	WALSALL (OR MERRION'S) LODGE	Lodge to Great Barr Hall (qv). 1854. Attributed to George Gilbert Scott. Rendered brick with some sandstone dressings and tile roof. Single storey. An old photograph, taken before the building was rendered, shows polychrome brickwork in a diaper pattern. G G Scott was a personal friend of the (unrelated) Scott family of Great Barr Hall and is known to have carried out work on the estate.	SP 03919 96060	Grade II LB - 1076383	19 th century
HER Events					
EBL668	CHAPEL LANE SURVEY	2001	SP 04459 95542		
EBL712	-	1995	SP 03816 94902		
EBL734	WATCHING BRIEF AT 15 PEAKHOUSE ROAD, GREAT BARR	1989	SP 04210 95430		
EBL793	WATCHING BRIEF AT LAND TO REAR OF 29-33 WILDERNESS LANE, GREAT BARR	2009	-		

Norwich:

Brettingham House
98 Pottergate,
Norwich
Norfolk
NR2 1EQ

01603 631 319

London:

70 Cowcross Street
London
EC1M 6EL

020 3011 0820

York:

Stanley Harrison House
The Chocolate Works
Bishopthorpe Road
York
YO23 1DE

01904 803 800

Manchester:

Peter House
Oxford Street
Manchester
Greater Manchester
M1 5AN

0161 711 1740



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Appendix 4: Transport Technical Note (September 2021)

Technical Note

Project: Land off Birmingham Road, Great Barr

Subject: Highways Appraisal

Client:	HIMOR	Version:	C
Project No:	05860	Author:	MW/JO
Date:	5th October 2021	Approved:	ME

Executive Summary

PJA has been commissioned by HIMOR to prepare a technical appraisal of transport and highways matters in relation to Land off Birmingham Road, Great Barr. Current aspirations are for the site to accommodate up to 345 dwellings, with the potential to include a park and ride/bus interchange along the Birmingham Road frontage.

The site context has been considered in detail within this Technical Note, including an assessment of existing transport infrastructure within the vicinity of the site. Based upon this, a comprehensive transport strategy has been prepared which demonstrates that:

- Access to the site is deliverable using land within the developer’s control;
- The site is highly accessible on foot and by bike, with opportunities to tie into existing walking and cycling infrastructure that provide access to local facilities and public transport;
- Pedestrian and cycle connections delivered by the site will enhance accessibility of adjacent residential areas to local facilities and public transport infrastructure. These will link into existing walking and cycling infrastructure within the vicinity of the site, and the route along Wilderness Lane identified within the Sandwell Local Cycling and Walking Infrastructure Plan (LCWIP);
- The site is in close proximity to existing high frequency, high quality public transport services which will be further enhanced by completion of the A34 SPRINT route between Walsall and Birmingham;
- The proposed development presents a realistic option for provision of a Park and Ride/bus interchange, within the preferred area identified by both Sandwell Metropolitan Borough Council (SMBC) and West Midlands Combined Authority (WMCA); and
- There is capacity within the local highway network to accommodate new development.

I Introduction

I.1 Overview

1.1.1 PJA has been commissioned by HIMOR to prepare a technical appraisal of transport and highways matters in relation to Land off Birmingham Road, Great Barr. The current aspirations for the site are as follows:

- **Option 1** – Residential development off Wilderness Lane (up to c.288 dwellings) with remaining land being used for agriculture (as existing) and an ecologically based country park; or
- **Option 2** – Residential development across the eastern and southern part of the site (c. 345 dwellings) with a potential park and ride/bus interchange along the Birmingham Road frontage, and area of green infrastructure and country park along the western boundary of the site.

I.2 Background

1.2.1 The site was submitted as a potential allocation for residential development within the Black Country Plan (Site Assessment Reference: SA-0003-SAN). Based on the draft Black Country Plan, the site was not identified as a draft allocation. Of specific relevance to highways, the site assessment stated:

- *Highway's access and transportation:* Existing access from Birmingham Road (adjacent to Peak House Farm house) would not be sufficient. Alternative access from Birmingham Road would be required;
- *Impact on the wider road network:* Potential for increased congestion of the surrounding road network. Increased emissions would be of concern; and
- *Connections to local cycle route networks:* Closest proposed cycle network is along Newton Road / Queslett Road. Offsite works required to create connection to A34 Perry Barr extension through to Walsall.

1.2.2 The site context has been considered in detail, including an assessment of existing transport infrastructure within the vicinity of the site. Based upon this, a comprehensive transport strategy is presented in this note which demonstrates that:

- Access to the site is deliverable using land within the developer's control;

- The site is highly accessible on foot and by bike, with opportunities to tie into existing walking and cycling infrastructure that provide access to local facilities and public transport;
- Pedestrian and cycle connections delivered by the site will enhance accessibility of adjacent residential areas to local facilities and public transport infrastructure. These will link into existing walking and cycling infrastructure within the vicinity of the site;
- The site is in close proximity to existing high frequency, high quality public transport services which will be further enhanced by completion of the A34 SPRINT route between Walsall and Birmingham; and
- There is capacity within the local highway network to accommodate new development.

2 Site Context

2.1 Local Highway Network

- 2.1.1 The site is located in the north of Great Barr, and is bounded by A34 Birmingham Road and residential areas to the north-east, Wilderness Lane and Q3 Academy to the south, Aston University Recreation Centre to the north and undeveloped green space to the west.

Figure 1: Site Location



2.2 Local Highway Network

A34 Birmingham Road

- 2.2.1 A34 Birmingham Road extends in a north-south alignment between Walsall and Perry Barr to the east of the site. In the vicinity of the site, the road comprises a dual carriageway and a nearside bus lane on both sides of the road, subject to a 30mph speed limit. Excluding the bus lane, the carriageway measures approximately 6.5m.
- 2.2.2 Lit footways are provided on both sides of the carriageway, with widths varying between approximately 2.5m and 5m.
- 2.2.3 Traffic is separated by a central reservation varying between approximately 2m and 4m in width, and parking is prohibited by double red lines.

Wilderness Lane

- 2.2.4 Wilderness Lane extends westwards from the A34 Birmingham Road to the south of the site. The road provides access to residential dwellings and residential cul-de-sacs before joining Longleat to the south of the M6. The road measures approximately 6m in width and is subject to a 30mph speed limit, and a 20mph speed limit in the vicinity of the Q3 Academy School.
- 2.2.5 Lit footways measuring approximately 1.5m-2m are generally provided on both sides of the carriageway, with no footway on the northern edge of the carriageway for approximately 200m along the site frontage.
- 2.2.6 In the vicinity of the Q3 Academy School, the area is subject to a 'School Zone', and 'School Keep Clear' markings are provided for an approximate total of 150m on the western edge of the carriageway in the vicinity of the school frontage. Speed humps are located on both sides of the carriageway throughout the 'School Zone'. Stopping in this zone is prohibited between 7am and 7pm Monday-Friday. Excluding the 'School Zone', the road is generally unrestricted for parking.

2.3 Sustainable Transport Opportunities

Walking and Cycling

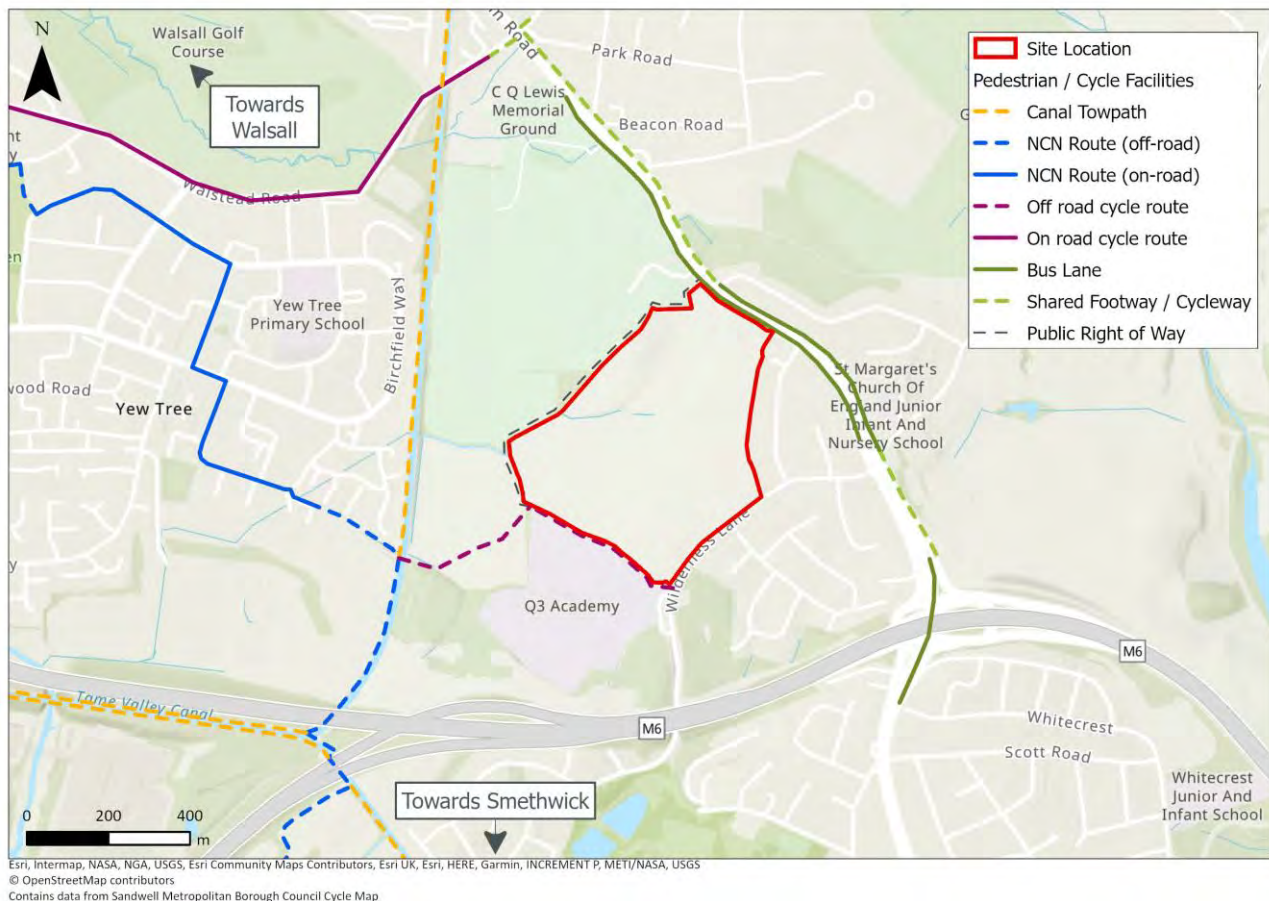
Existing Infrastructure

- 2.3.1 The site is surrounded by various existing facilities for pedestrians and cyclists. Birmingham Road and Wilderness Lane, which directly bound the site, provide lit footway provision connecting to surrounding residential areas. Two Public Rights of Way (PRoW) bound the site to the north and west, which connect Wilderness Lane, Birmingham Road, the Rushall Canal Towpath and residential areas in Yew Tree. The PRoW along the northern boundary of the site is the Beacon Way long distance path (LDP).
- 2.3.2 There are a range of cycling facilities within the vicinity of the site, as follows:
- **National Cycle Network (NCN) 5** routes to the east of the site connecting Walsall (approx. 5km – 19 mins) and Smethwick (approx. 7.5km – 28 mins). A large portion of this routes is off street, following the Rushall Canal and River Tame, while on-road routes generally follow quieter roads suitable for cycling. NCN Route 5 also provides access to surrounding cycle facilities, including provision on A4041 Newton Road which provides a connection to facilities and residential areas in Newton and Great Barr.
 - A34 Birmingham Road also has dedicated cycle facilities, including a **shared footway /cycleway** on the southbound side of the carriageway and cyclists are permitted to use the

bus lanes. Together, these facilities provide access towards residential areas and amenities in Great Barr to the south of the site, as well as amenities to the north of the site surrounding Park Hall Road.

- Additional **off-road routes** are also available along canal towpaths surrounding the site, providing access towards Tame Bridge Parkway Railway Station (approx. 2.5km – 9 mins), Friar Park and Wednesbury (approx. 3km-5km – 11mins-19mins), Perry Barr (approx. 5km – 19 mins) and Daisy Bank (approx. 3km – 11 mins).

Figure 2: Pedestrian and Cycle Facilities



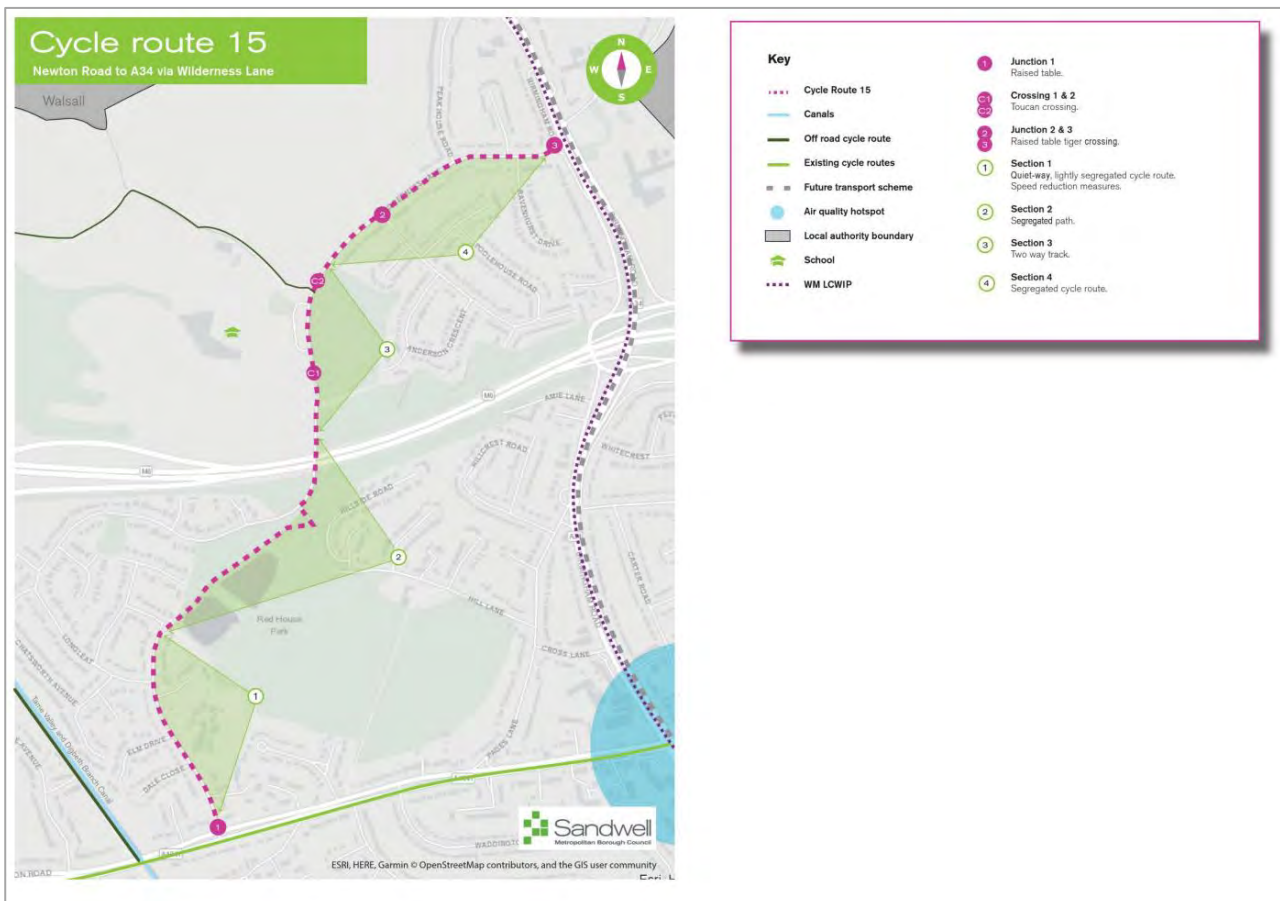
Future Infrastructure

2.3.3 Within the West Midlands Local Cycling and Walking Infrastructure (LCWIP), the A34 between Perry Barr and Walsall is set out as a regional priority route. It is understood that designs of these routes will focus on fully inclusive, segregated two way cycle tracks with priority crossings. This

route is within Phase 1 delivery of the West Midlands LCWIP. No timescales for delivery are provided within this document.¹

2.3.4 The Sandwell LCWIP sets out 15 cycle routes and six walking zones to support modal shift to active modes based on highest cycle and walking demand across the borough. Cycle Route 15 (Newton Road to A34 via Wilderness Lane) is identified within the Sandwell LCWIP, linking into the existing cycle route along A4041, NCN Route 5, an off-road cycle route along Dudley Canal and the proposed SPRINT bus route along the A34. Potential improvements along this route include speed reduction measures, multiple toucan crossings and raised table tiger crossings. The cycle route itself could be a mixture of segregated cycle route, two-way cycle track, segregated paths, and a quiet way (lightly segregated cycle route).

Figure 3: Sandwell LCWIP Extract – Cycle Route 15



¹ West Midlands LCWIP (2019) - https://www.birmingham.gov.uk/downloads/file/14988/bcc_14_a_-_west_midlands_local_cycling_and_walking_infrastructure_plan_2019

Summary

2.3.5 This section has demonstrated that the site is highly accessible on foot and by bike. It benefits from being in close proximity to a number of existing cycle routes to a range of local destinations, which will be further enhanced by LCWIP route along Wilderness Lane. The surrounding network also has footway and crossing provision for pedestrians, supporting journeys on foot to local amenities.

Bus

Existing Infrastructure

2.3.6 The frequent National Express 51 service which connects to Birmingham, Walsall, Great Barr and Perry Barr is available from bus stops located on A34 Birmingham Road. These stops provide seating, shelter and timetable provision for passengers.

2.3.7 The 424 service is available from Wilderness Lane, which stops at the flag/pole stop at the Q3 Academy School, and according to bus timetables also stops in the vicinity of Peak House Road although there is no formal bus stop provision.

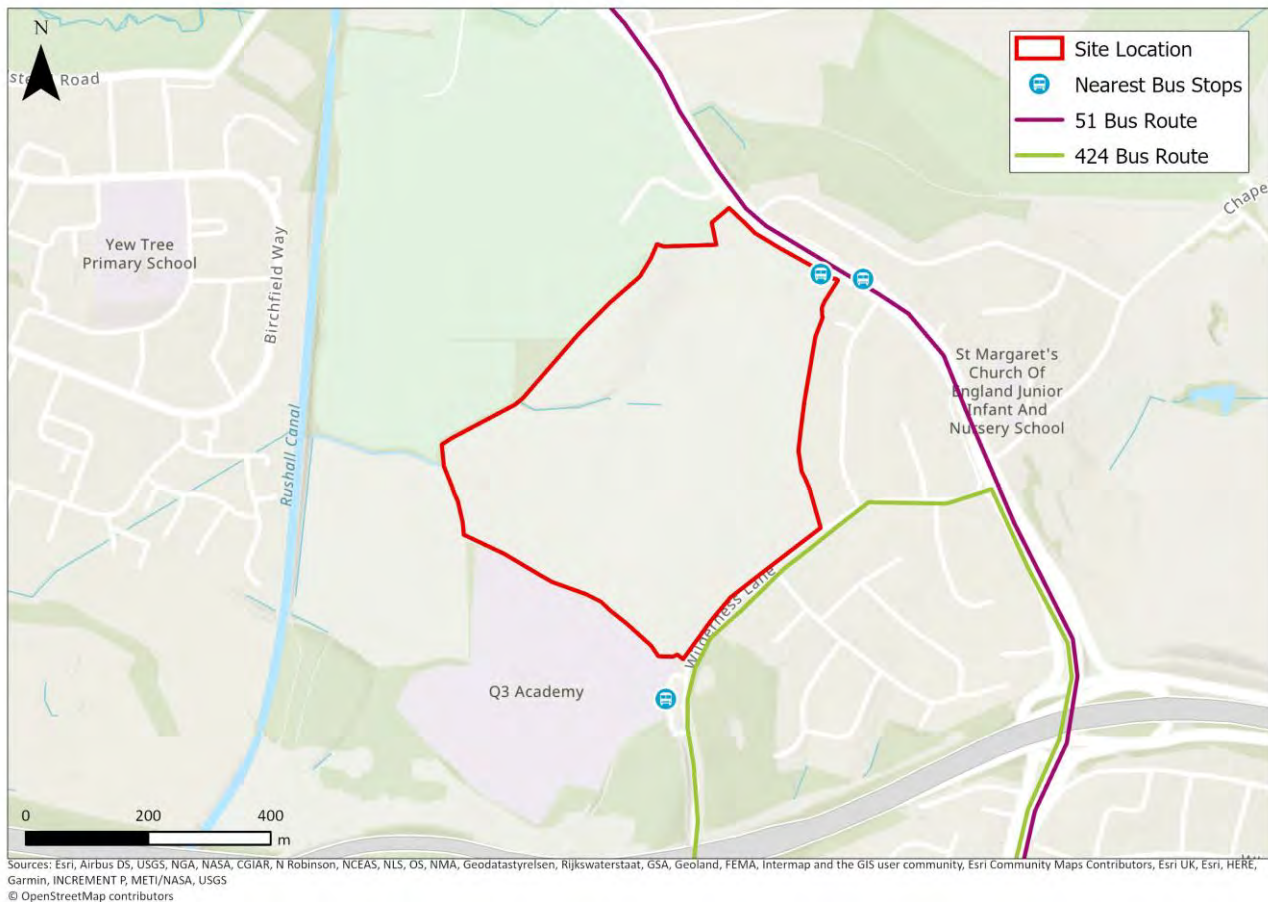
2.3.8 A summary of the existing services available from these stops is presented in Table 1. The proximity of these stops in relation to the site is shown in Figure 4

Table 1: Bus Services

Number	Stop Location	Provider	Route	Frequency	Days of Week
51	A34 Birmingham Road	National Express West Midlands	Birmingham – Walsall	Every ten minutes throughout the day between approximately 04:30 and 00:30.	Mon - Sun
424	Wilderness Lane	Thandi Coaches (Red) Ltd	Perry Barr – Asda Queslett vis Hamstead	Hourly between 08:51 and 17:47 – both directions. No service available outside these periods.	Mon - Sat

2.3.9 It is understood that additional services for school pupils are available from stops surrounding the site.

Figure 4: Bus Stops



Committed Infrastructure

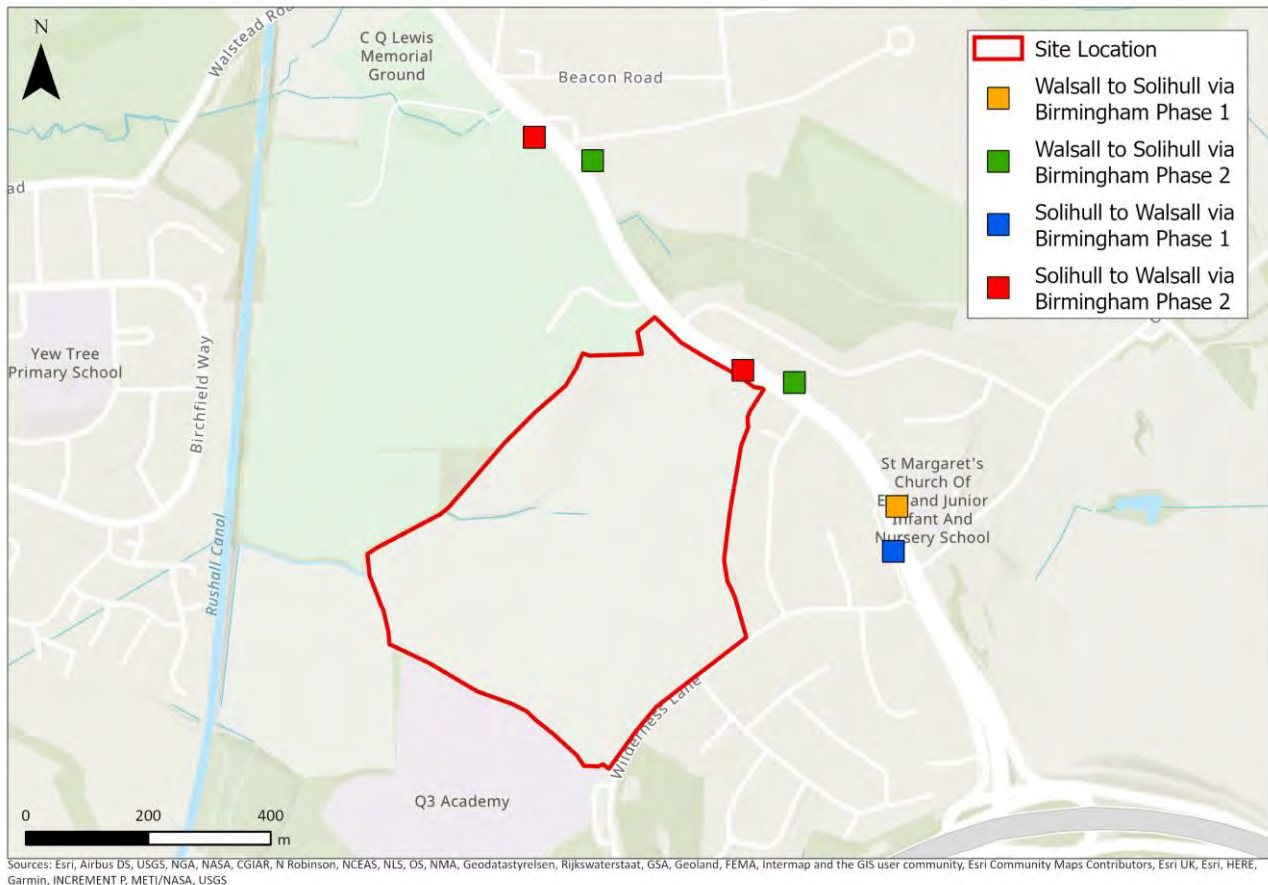
2.3.10 Transport for West Midlands (TfWM) are proposing to provide a bus rapid transit scheme (SPRINT) along the A34 Birmingham Road, past the development site. This will provide a dedicated bus lane through this section of the A34 Birmingham Road, in both directions. It should be noted that a bus lane in the northbound direction is already provided on this section of the A34.

2.3.11 This route will connect Birmingham with Walsall, and once complete will connect to the HS2 station at Curzon Street. The route will be completed over two phases, as follows:

- **Phase 1** - to be completed prior to the Birmingham 2022 Commonwealth Games (June 2022); and
- **Phase 2** - to be completed after the Birmingham 2022 Commonwealth Games (December 2024).

2.3.12 The majority of the infrastructure along the frontage of the site is either an existing bus lane, or a bus lane that will be delivered in Phase 1. The location of the proposed stops within the vicinity of the site are shown in Figure 5.

Figure 5: Proposed SPRINT Bus Stop Locations²



2.3.13 The Full Business Case for A34 SPRINT identifies that the scheme will reduce current timetabled journey times between Birmingham and Walsall by 5 minutes, to less than 38 minutes. It also identifies that during peak periods, services will run at least every 10 minutes in both directions³.

² <https://www.tfwm.org.uk/who-we-are/what-we-do/sprint-priority-bus-corridor/sprint-bus-shelter-feedback/>

³ A34 Walsall to Birmingham SPRINT Full Business Case -

<https://birmingham.cmis.uk.com/Birmingham/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=RprWT%2FKxzui%2BbPW1sIDmRQOAiv9FffD58t%2BTIq%2FaB%2FxoXkJN8Coi3Q%3D%3D&rUzwrPf%2BZ3zd4E7lkn8Lyw%3D%3D=pwRE6AGJFLDNlh225F5QMaQWctPHwdhUfCZ%2FLUQzgA2uL5jNRG4jdQ%3D%3D&mCTIbCubSfFXsDGW9IXnlg%3D%3D=hFflUdN3100%3D&kCx1AnS9%2FpWZQ40DXFvdEw%3D%3D=hFflUdN3100%3D&uJovDxwdjMPoYv%2BAJvYtyA%3D%3D=ctNJff55vVA%3D&FgPIIEJYlotS%2BYGoBi5oIA%3D%3D=NhdURQburHA%3D&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJff55vVA%3D&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJff55vVA%3D&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJff55vVA%3D>

Summary

2.3.14 This section has demonstrated that the site is highly accessible by public transport. The site is within a short walking distance of existing bus services along A34 Birmingham Road which operate at a 10 minute frequency throughout the day in both direction. This will be further enhanced by the completion of SPRINT, reducing journey times to Birmingham City Centre to less than 38 minutes.

Rail

2.3.15 The nearest railway station is Tame Bridge Railway Station, located approximately 2km to the west of the site. The station provides regular West Midlands Railway Services throughout the day to the following locations:

- Birmingham New Street (four per hour);
- Birmingham International (one direct service per hour);
- Walsall (four per hour); and
- Rugeley Trent Valley (two per hour).

2.3.16 The station has provision for 27 cycles, and can be reached from the site via signed cycle routes along NCN route 5 and canal towpaths, a cycle journey time of approximately 9 minutes.

2.3.17 The most direct route to the station from the site by public transport is the number 45 bus service. The closest stop to the site is located on Birchfield Way, approximately 1km (10 minute walk) from the site via PRow to the west of the site.

2.4 Local Amenities

Accessibility by Foot/Cycle

2.4.1 Guidance provided by the institution of Highways and Transportation (IHT) in their publication *'Guidelines for Providing Journeys on Foot'* (2000) suggests that in terms of commuting, walking to school and recreational journeys; walk distances of up to 2km can be considered as a preferred maximum with 'desirable' and 'acceptable' distances being 500m and 1km, respectively. It should however be noted that journeys of a longer length are often undertaken.

Table 2: Walk Journey Distance and Time Thresholds

IHT Standard	Distance (m)		Walk Time (mins)	
	Commuting, Walking to School	Other, non-commuter journeys	Commuting, Walking to School	Other, non-commuter journeys
Desirable	500	400	6	5

IHT Standard	Distance (m)		Walk Time (mins)	
	Commuting, Walking to School	Other, non-commuter journeys	Commuting, Walking to School	Other, non-commuter journeys
Acceptable	1,000	800	12	10
Preferred Maximum	2,000	1,200	24	15

2.4.2 The amenities which are accessible using surrounding pedestrian/cycle facilities are presented in Table 3, the distance of these have been measured from the centre of the site via the closest access point.

Table 3: Local Amenities

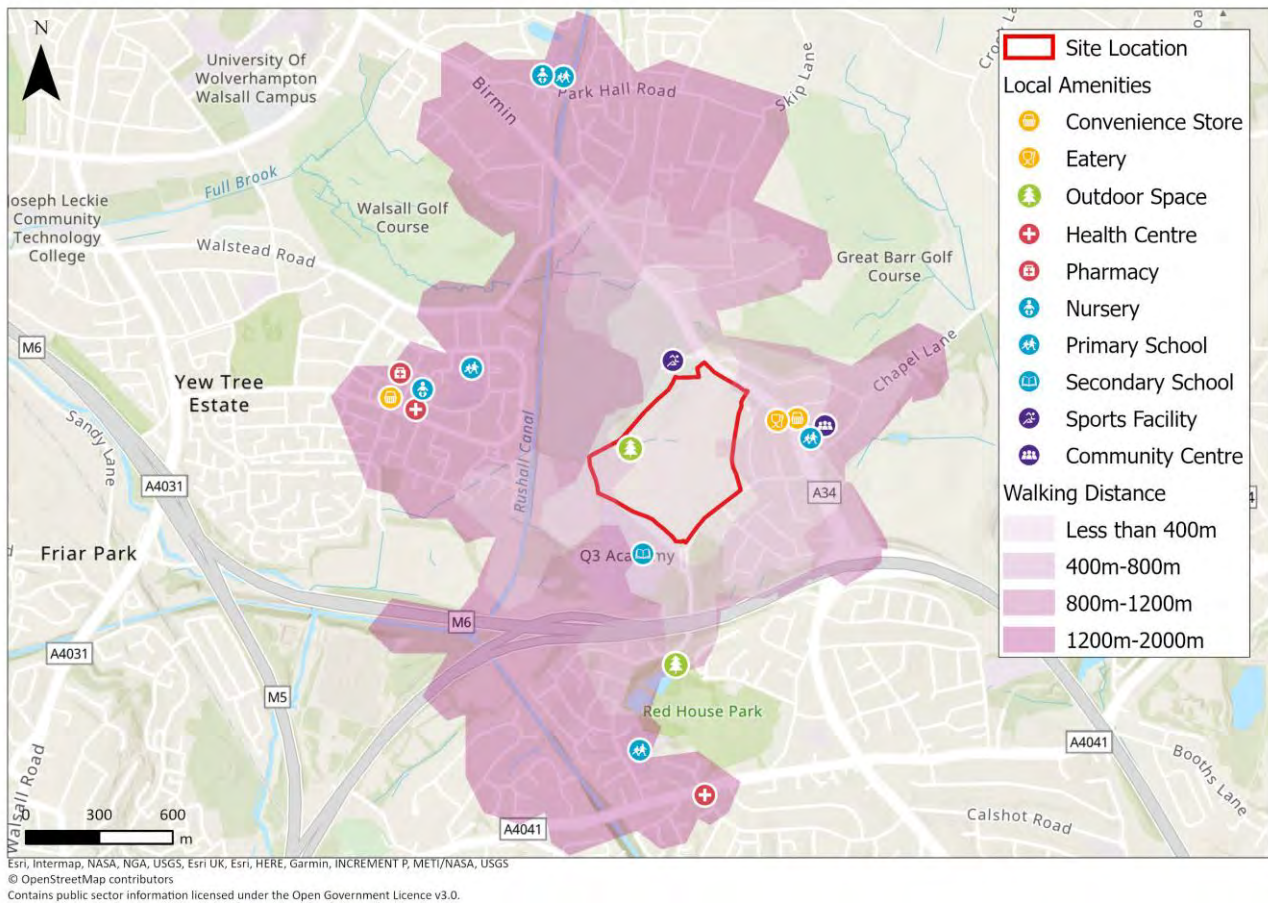
Amenity	Location	Distance from Site	Walking Time	Cycling Time	IHT Guidance
Outdoor Space	On Site	Less than 400m	Less than 5 mins	Less than 2 mins	Desirable
Sports Facility	Aston University Recreation Centre	400m	5 mins	2 mins	Desirable
Secondary School	Q3 Academy School - Wilderness Lane	500m	6 mins	2 mins	Acceptable
Eateries	Various - Birmingham Road	650m	8 mins	2 mins	Acceptable
Convenience Store	Beacon Express - Birmingham Road	750m	9 mins	3 mins	Acceptable
Primary School	St Margaret's CofE Primary School - Birmingham Road	850m	10 mins	3 mins	Acceptable
Outdoor Space	Red House Park	900m	11 mins	3 mins	Preferred Maximum
Community Centre	Great Barr Community Hub - Vicarage Rise	1.1km	13 mins	4 mins	Preferred Maximum
Primary School	Grove Vale Primary School - Monksfield Avenue	1.5km	18 mins	6 mins	Preferred Maximum
Nursery	Little Saplings Childcare Centres - Plane Tree Road	1.6km	19 mins	6 mins	Preferred Maximum
Convenience Store	Premier - Redwood Road	1.7km	20 mins	6 mins	-
Medical Practice	Yew Tree Healthy Living Centre - Redwood Road	1.7km	20 mins	6 mins	-
Pharmacy	Yew Tree Pharmacy - Redwood Road	1.7km	20 mins	6 mins	-
Primary School	Park Hall Primary School - Park Hall Road	1.8km	21 mins	7 mins	Preferred Maximum

Amenity	Location	Distance from Site	Walking Time	Cycling Time	IHT Guidance
Nursery	Park Hall Infant Academy - Park Hall Road	1.8km	21 mins	7 mins	Preferred Maximum
Primary School	Yew Tree Primary School - Birchfield Way	1.9km	23 mins	7 mins	Preferred Maximum
Medical Practice	Park House Surgery - Newton Road	1.9km	23 mins	7 mins	-

2.4.3 Table 3 indicates that there are a range of amenities located within an acceptable walking distance of the site and/or short cycling distance. These amenities are also presented in Figure 6.

2.4.4 In addition, it is proposed to provide a medical centre on-site which will further enhance accessibility to health facilities for both proposed residents, and the local community.

Figure 6: Local Amenities



2.5 Summary

- 2.5.1 This section has demonstrated that the site is highly accessible by sustainable modes of travel and well-located in terms of access to existing local amenities.
- 2.5.2 The site is within acceptable walking distance of a range of local amenities, including convenience stores and primary and secondary education provision. Existing footways, footpaths and crossing points facilitate trips on foot to these amenities. There is also a range of cycling infrastructure within the vicinity of the site, which will be complemented by introduction of the LCWIP route along Wilderness Lane.
- 2.5.3 The site benefits from being in close proximity to an existing high frequency bus corridor providing access to both Walsall and Birmingham. This will be further enhanced following completion of SPRINT along A34, which will reduce journey times, improve journey time reliability and frequency of bus services in both directions.

3 Transport Strategy

3.1 Introduction

- 3.1.1 As set out in Section 1, there are currently two potential options for development of the site:
- **Option 1** – Residential development off Wilderness Lane (up to c. 288 dwellings) with remaining land being used for agriculture (as existing) and an ecologically based country park; or
 - **Option 2** – Residential development across the eastern and southern part of the site (c. 345 dwellings) with a potential park and ride/bus interchange along the Birmingham Road frontage, and area of green infrastructure and country park along the western boundary of the site.
- 3.1.2 The following sections outline the multi-modal transport strategy for each of these options.

3.2 Option I

- 3.2.1 The vision document for the site shows the indicative masterplan for this Option.

Vehicular Access

- 3.2.2 Given the considerable frontage onto Wilderness Lane, up to two vehicle access points could be provided, if required, as shown on Drawing 04834-SK-0001-P1 and Drawing 04834-SK-0002-P1 contained within **Appendix D**.

3.2.3 Both of these junctions achieve required visibility splays commensurate with a posted speed limit of 30mph and guidance for calculating Stopping Sight Distance (SSD) set out in Manual for Streets 2.

3.2.4 Junction capacity modelling has been undertaken for a range of assessment scenarios and has demonstrated that the access arrangement shown within **Appendix D** would work well within capacity during both weekday peak periods.

Pedestrian/Cycle Access

3.2.5 The main pedestrian and cycle access point to the site will be provided from the vehicular site access onto Wilderness Lane. It is also proposed to divert the Beacon Way LDP along the northern boundary of the site onto Birmingham Road. This will provide a high quality link to ensure the site is permeable for active travel modes, and to provide access to existing public transport infrastructure and local facilities along Birmingham Road. This would link onto the LCWIP route along Wilderness Lane identified in Section 2 of this report.

3.2.6 In addition, it is proposed to extend the existing footway on the northern side of Wilderness Lane into the site, to provide a route towards Q3 Academy Great Barr and residential areas to the south of the site.

3.2.7 There are currently no public walking or cycling routes through the site, and so the above provision will improve access to local amenities and public transport infrastructure for existing residents in the local areas, as follows:

- A more direct route for residential areas surrounding A34 Birmingham Road north of Merrion's Close to Q3 Academy Great Barr, via the diverted Beacon Way LDP and a series of high quality pedestrian and cycle routes within the site; and
- A high quality and direct route for pedestrians and cyclists from areas west of Rushall Canal such as Yew Tree, The Delves, Fulbrook, to A34 SPRINT routes and local amenities / facilities, St Margaret's C of E Primary School, Aston University Recreation Centre, and Merrions Wood.

Public Transport

3.2.8 This option will provide a high quality network of pedestrian facilities from the site to existing bus stops on A34 Birmingham Road and Wilderness Lane. The nearest existing bus stops to the site are located on Wilderness Lane, approximately 50m and 150m from each access point.

3.2.9 Additional bus stops are available on A34 Birmingham Road which will be enhanced once each of the SPRINT phases are complete. The nearest stops on A34 Birmingham Road are

approximately 450m from the site access onto Wilderness Lane, with signalised crossing facilities adjacent to the stop to facilitate access to bus stops on the northern side of the carriageway.

- 3.2.10 Once SPRINT is complete, these stops will provide high frequency services towards both Walsall and Birmingham, within close proximity to the site.

3.3 Option 2

- 3.3.1 The vision document for the site shows the indicative masterplan for this Option.

Vehicular Access

- 3.3.2 In this option, it is proposed to provide access to the site in two locations:

- A34 Birmingham Road – four arm signalised junction; and
- Wilderness Lane – three arm priority junction.

- 3.3.3 These two access points would be connected via a Spine Road. The provision of this Spine Road would enhance the permeability of the site and distribute the traffic generated by the site across the local highway network.

A34 Birmingham Road

- 3.3.4 Given the strategic significance of the A34 SPRINT route, it is likely that TfWM will require priority measures to be implemented at the A34 Birmingham Road site access to prioritise bus access/egress from the site. Therefore, it is proposed to provide a signalised site access junction on A34 Birmingham Road. Drawing Number 04219-SK-0003-P2 contained within **Appendix D** shows the proposed arrangement.

- 3.3.5 As shown in **Appendix D**, the design accommodates two ahead lanes for general traffic on A34 in both direction, a one-lane entry to the junction from the site access, a bus entry lane to the site from A34 northbound and a right turn/ahead flare to retain a full bus lane in the southbound direction between Beacon Road and Merrion's Close.

- 3.3.6 Junction capacity modelling has been undertaken for a range of assessment scenarios and has demonstrated that the access arrangement shown within **Appendix D** can be accommodated in capacity terms.

Wilderness Lane

- 3.3.7 Vehicular access to the site from Wilderness Lane would be provided as per that summarised above for Option 1.

Pedestrian/Cycle Access

- 3.3.8 The main pedestrian and cycle access points to the site will be provided from the vehicular site access points onto both Wilderness Lane and Birmingham Road. The Spine Road through the site will include dedicated facilities for both pedestrians and cyclists to ensure permeability through the site by active modes, providing links to existing infrastructure, public transport routes and local amenities within the vicinity of the site. This will be complemented by diversion of the Beacon Way LDP through the site, which connects onto off-road routes along National Cycle Route 5 and Rushall Canal to the west of the site as well as the LCWIP route along Wilderness Lane identified in Section 2 of this report.
- 3.3.9 There are currently no public walking or cycling routes through the site, and so the above provision will improve access to local amenities and public transport infrastructure for existing residents in the local areas, as follows:
- A more direct route for residential areas surrounding A34 Birmingham Road north of Peak House Road to Q3 Academy Great Barr, via a series of high quality pedestrian and cycle routes within the site; and
 - A high quality and direct route for pedestrians and cyclists from areas west of Rushall Canal e.g. Yew Tree, The Delves, Fulbrook, to A34 SPRINT routes and local amenities / facilities e.g. St Margaret's C of E Primary School, Aston University Recreation Centre, and Merrions Wood.

Public Transport

- 3.3.10 In this option, there is potential to extend the SPRINT routes (in both directions) into the site, as well as existing conventional bus services, where possible. Additional bus stops will also be available on Wilderness Lane, as per that summarised for Option 1.
- 3.3.11 In this Option it is proposed to provide a potential 250 space car park for use as a Park & Ride facility for SPRINT. Whilst SPRINT Phase 1 does not require a Park & Ride to justify its implementation⁴, initial discussions with WMCA have identified that they are currently exploring sites along the A34 within the vicinity of M6 Junction 7 for implementing a Park & Ride site for SPRINT.
- 3.3.12 It is considered that the proposed development presents a realistic option for provision of a Park & Ride, within the preferred area identified by both Sandwell MBC and WMCA.

⁴ Walsall Council Cabinet Meeting, 10th February 2021, Item 13.

3.4 Highway Infrastructure

Option 1

3.4.1 The forecast vehicle trip generation for this Option is set out in Table 4, based on the methodology set out in **Appendix A**.

Table 4: Vehicle Trip Generation - Option 1

	Weekday AM Peak (08:00 – 09:00)			Weekday PM Peak (17:00 – 18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Trip Rate	0.122	0.373	0.495	0.328	0.155	0.483
Trip Generation (288 dwellings)	35	107	143	94	45	139

3.4.2 Traffic flow diagrams showing the assignment of these trips onto the local highway network are provided in **Appendix C**.

3.4.3 The site access onto Wilderness Lane has been assessed using junction capacity modelling software for a range of assessment scenarios and is shown to operate well within capacity.

3.4.4 The trip generation set out in Table 4 is likely to be spread across the three main routes to/from the site during each peak. To the north, vehicles could route onto the A34 via either Peak House Lane or Wilderness Lane. This will spread the potential impact across the local highway network, reducing the impact on queueing and delay. To the south, vehicles will route via the Monksfield Avenue/A4041 Newton Road junction. A high level review of this junction has identified that significant highway is available should mitigation be required.

Option 2

3.4.5 The forecast vehicle trip generation for this Option is set out in Table 5, based on the methodology set out in **Appendix A**.

Table 5: Vehicle Trip Generation - Option 2

	Weekday AM Peak (08:00 – 09:00)			Weekday PM Peak (17:00 – 18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Residential						
Trip Rate	0.122	0.373	0.495	0.328	0.155	0.483
Trip Generation (345 dwellings)	42	129	171	113	53	167

	Weekday AM Peak (08:00 – 09:00)			Weekday PM Peak (17:00 – 18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Park & Ride						
Trip Generation (250 spaces)	100	0	100	0	100	100
Total						
Total	143	132	276	116	155	271

3.4.6 Traffic flow diagrams showing the assignment of these trips onto the local highway network are provided in **Appendix C**.

3.4.7 Both of the vehicular site access points have been tested using junction capacity modelling software for a range of assessment scenarios and found to work with capacity. Beyond this, as two site access points will be provided, the impact of the development will be spread across the local highway network reducing the potential impact of the development on queueing and delay. The Spine Road connecting these access points will be designed appropriately and sensitively to maximise the permeability of the site, but to not introduce a rat-running route through a predominantly residential area. This link will therefore provide local benefits as an alternative route between Wilderness Lane and A34 Birmingham Road.

4 Summary

4.1.1 This appraisal has demonstrated that the proposed site is suitable for residential development, regardless of which development option is brought forward in that:

- The site benefits from ability to provide vehicle access from either A34 Birmingham Road or Wilderness Lane;
- The site is highly accessible on foot and by bike, with opportunities to tie into existing walking and cycling infrastructure that provide access to local facilities and public transport infrastructure;
- The pedestrian and cycle access strategy will enhance the permeability of the site, and provide access to existing public transport infrastructure, local facilities and SPRINT bus stops on A34 Birmingham Road and within the vicinity of the site not only for residents of the development but also those in adjacent residential areas;
- The site is in close proximity to existing high frequency, high quality public transport services which will be further enhanced by completion of the A34 SPRINT route between Walsall and Birmingham;

- If Option 2 is pursued, the park & ride provision further enhances the accessibility of the site by public transport, with the potential to bring both SPRINT and existing bus services into the site. This has the potential to intercept vehicles routing south on A34 and leaving the M6 at Junction 7 to route into Birmingham City Centre, and encourage modal shift away from the private car; and
- It is anticipated that any off-site highway impacts can be mitigated to an acceptable degree.

4.1.2 On this basis, it is considered that the site is fully compliant with Paragraph 110 of National Planning Policy Framework (NPPF) which states that:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b safe and suitable access to the site can be achieved for all users;*
- c the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and*
- d any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”*

Appendix A Traffic Demand Methodology and Calculations

I Park and Ride

4.1.3 Data has been provided from TfWM regarding the arrival profile of drivers to rail Park and Ride sites across the West Midlands. The maximum % of drivers arriving in any one hour is 36.5% (07:00 – 08:00). Therefore, for the purposes of this assessment it is assumed that 40% of car parking spaces will be filled during the AM peak, and emptied during the PM peak. It is considered that this presents a robust basis for assessment of likely travel demand generated by the site during network peak periods.

4.1.4 The trip distribution and assignment for Park and Ride trips has been determined using the following methodology:

- 2011 census data for location of usual residence and place of work by method of travel to work (car drivers only) extracted for Middle Super Output Areas (MSOAs) within 400m buffer of A34 Sprint Route alignment (Walsall – Birmingham);
- Manual selection of MSOA origin/destination pairs which would use the proposed Park and Ride facility;
- Calculation of trip distribution based on 2011 census data for location of usual residence and place of work by method of travel to work (car drivers only) for identified MSOA origin/destination pairs; and
- Trips between location of usual residence (for identified MSOA origin/destination pairs) and development site assigned to the network using online routing software for a Wednesday at 08:30.

5 Residential

5.1.1 To calculate the travel demand associated with the residential element of the site, trip rates have been extracted from the TRICs database based on the following parameters:

- **Land Use** – Houses, Privately Owned
- **Regions** – all regions excluding Wales, Greater London, and Ireland;
- **Locations** – Edge of Town Centre, Suburban Area and Edge of Town;

5.1.2 Full TRICs outputs are provided in **Appendix B**.

- 5.1.3 The trip distribution has been calculated based on 2011 journey to work census data for the MSOA in which the site is located (Sandwell 006). This includes existing residential areas adjacent to A34 Birmingham Road and A4041 Newton Road.
- 5.1.4 The trips have been assigned to the network based on online journey routing software for a Wednesday at 08:30, and a manual sense check of results based on access arrangements to the site in each scenario.

Appendix B **TRICs Outputs**

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLESSelected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	1 days
	KC KENT	3 days
	WS WEST SUSSEX	4 days
03	SOUTH WEST	
	DV DEVON	1 days
05	EAST MIDLANDS	
	DS DERBYSHIRE	1 days
06	WEST MIDLANDS	
	ST STAFFORDSHIRE	1 days
	WO WORCESTERSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NE NORTH EAST LINCOLNSHIRE	2 days
	NY NORTH YORKSHIRE	1 days
11	SCOTLAND	
	FA FALKIRK	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 110 to 805 (units:)
 Range Selected by User: 100 to 805 (units:)

Parking Spaces Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/11 to 10/07/18

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Tuesday	3 days
Wednesday	4 days
Thursday	4 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	16 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	5
Edge of Town	10

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	15
No Sub Category	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 16 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,001 to 5,000	3 days
5,001 to 10,000	2 days
10,001 to 15,000	7 days
15,001 to 20,000	1 days
20,001 to 25,000	3 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	3 days
50,001 to 75,000	3 days
75,001 to 100,000	3 days
100,001 to 125,000	1 days
125,001 to 250,000	6 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	4 days
1.1 to 1.5	12 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	4 days
No	12 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	16 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	DS-03-A-02	MIXED HOUSES	DERBYSHIRE
	RADBOURNE LANE DERBY		
	Edge of Town Residential Zone		
	Total Number of dwellings:	371	
	Survey date: TUESDAY	10/07/18	Survey Type: MANUAL
2	DV-03-A-02	HOUSES & BUNGALOWS	DEVON
	MILLHEAD ROAD HONITON		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total Number of dwellings:	116	
	Survey date: FRIDAY	25/09/15	Survey Type: MANUAL
3	ES-03-A-03	MIXED HOUSES & FLATS	EAST SUSSEX
	SHEPHAM LANE POLEGATE		
	Edge of Town Residential Zone		
	Total Number of dwellings:	212	
	Survey date: MONDAY	11/07/16	Survey Type: MANUAL
4	FA-03-A-02	MIXED HOUSES	FALKIRK
	ROSEBANK AVENUE & SPRINGFIELD DRIVE FALKIRK		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total Number of dwellings:	161	
	Survey date: WEDNESDAY	29/05/13	Survey Type: MANUAL
5	KC-03-A-04	SEMI-DETACHED & TERRACED	KENT
	KILN BARN ROAD AYLESFORD DITTON		
	Edge of Town Residential Zone		
	Total Number of dwellings:	110	
	Survey date: FRIDAY	22/09/17	Survey Type: MANUAL
6	KC-03-A-06	MIXED HOUSES & FLATS	KENT
	MARGATE ROAD HERNE BAY		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total Number of dwellings:	363	
	Survey date: WEDNESDAY	27/09/17	Survey Type: MANUAL
7	KC-03-A-07	MIXED HOUSES	KENT
	RECVLVER ROAD HERNE BAY		
	Edge of Town Residential Zone		
	Total Number of dwellings:	288	
	Survey date: WEDNESDAY	27/09/17	Survey Type: MANUAL
8	NE-03-A-02	SEMI DETACHED & DETACHED	NORTH EAST LINCOLNSHIRE
	HANOVER WALK SCUNTHORPE		
	Edge of Town No Sub Category		
	Total Number of dwellings:	432	
	Survey date: MONDAY	12/05/14	Survey Type: MANUAL
9	NE-03-A-03	PRIVATE HOUSES	NORTH EAST LINCOLNSHIRE
	STATION ROAD SCUNTHORPE		
	Edge of Town Centre Residential Zone		
	Total Number of dwellings:	180	
	Survey date: TUESDAY	20/05/14	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

10	NY-03-A-06	BUNGALOWS & SEMI DET.	NORTH YORKSHIRE
	HORSEFAIR BOROUGHBRIDGE		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total Number of dwellings:	115	
	Survey date: FRIDAY	14/10/11	Survey Type: MANUAL
11	ST-03-A-07	DETACHED & SEMI-DETACHED	STAFFORDSHIRE
	BEACONSIDE STAFFORD MARSTON GATE		
	Edge of Town Residential Zone		
	Total Number of dwellings:	248	
	Survey date: WEDNESDAY	22/11/17	Survey Type: MANUAL
12	WO-03-A-07	MIXED HOUSES	WORCESTERSHIRE
	TEASEL WAY WORCESTER CLAINES		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total Number of dwellings:	146	
	Survey date: TUESDAY	26/06/18	Survey Type: MANUAL
13	WS-03-A-04	MIXED HOUSES	WEST SUSSEX
	HILLS FARM LANE HORSHAM BROADBRIDGE HEATH		
	Edge of Town Residential Zone		
	Total Number of dwellings:	151	
	Survey date: THURSDAY	11/12/14	Survey Type: MANUAL
14	WS-03-A-06	MIXED HOUSES	WEST SUSSEX
	ELLIS ROAD WEST HORSHAM S BROADBRIDGE HEATH		
	Edge of Town Residential Zone		
	Total Number of dwellings:	805	
	Survey date: THURSDAY	02/03/17	Survey Type: MANUAL
15	WS-03-A-08	MIXED HOUSES	WEST SUSSEX
	ROUNDSTONE LANE ANGMERING		
	Edge of Town Residential Zone		
	Total Number of dwellings:	180	
	Survey date: THURSDAY	19/04/18	Survey Type: MANUAL
16	WS-03-A-09	MIXED HOUSES & FLATS	WEST SUSSEX
	LITTLEHAMPTON ROAD WORTHING WEST DURRINGTON		
	Edge of Town Residential Zone		
	Total Number of dwellings:	197	
	Survey date: THURSDAY	05/07/18	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
ES-03-A-04	Location - not comparable to development site.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.074	16	255	0.296	16	255	0.370
08:00 - 09:00	16	255	0.122	16	255	0.373	16	255	0.495
09:00 - 10:00	16	255	0.143	16	255	0.155	16	255	0.298
10:00 - 11:00	16	255	0.121	16	255	0.149	16	255	0.270
11:00 - 12:00	16	255	0.128	16	255	0.139	16	255	0.267
12:00 - 13:00	16	255	0.153	16	255	0.142	16	255	0.295
13:00 - 14:00	16	255	0.153	16	255	0.149	16	255	0.302
14:00 - 15:00	16	255	0.154	16	255	0.177	16	255	0.331
15:00 - 16:00	16	255	0.246	16	255	0.168	16	255	0.414
16:00 - 17:00	16	255	0.260	16	255	0.160	16	255	0.420
17:00 - 18:00	16	255	0.328	16	255	0.155	16	255	0.483
18:00 - 19:00	16	255	0.293	16	255	0.175	16	255	0.468
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.175			2.238			4.413

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	110 - 805 (units:)
Survey date date range:	01/01/11 - 10/07/18
Number of weekdays (Monday-Friday):	16
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TAXIS

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.001	16	255	0.001	16	255	0.002
08:00 - 09:00	16	255	0.002	16	255	0.002	16	255	0.004
09:00 - 10:00	16	255	0.002	16	255	0.001	16	255	0.003
10:00 - 11:00	16	255	0.002	16	255	0.003	16	255	0.005
11:00 - 12:00	16	255	0.001	16	255	0.001	16	255	0.002
12:00 - 13:00	16	255	0.002	16	255	0.002	16	255	0.004
13:00 - 14:00	16	255	0.002	16	255	0.001	16	255	0.003
14:00 - 15:00	16	255	0.002	16	255	0.003	16	255	0.005
15:00 - 16:00	16	255	0.005	16	255	0.004	16	255	0.009
16:00 - 17:00	16	255	0.004	16	255	0.004	16	255	0.008
17:00 - 18:00	16	255	0.001	16	255	0.001	16	255	0.002
18:00 - 19:00	16	255	0.002	16	255	0.002	16	255	0.004
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.026			0.025			0.051

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL OGVS

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.000	16	255	0.000	16	255	0.000
08:00 - 09:00	16	255	0.001	16	255	0.001	16	255	0.002
09:00 - 10:00	16	255	0.002	16	255	0.001	16	255	0.003
10:00 - 11:00	16	255	0.003	16	255	0.003	16	255	0.006
11:00 - 12:00	16	255	0.001	16	255	0.002	16	255	0.003
12:00 - 13:00	16	255	0.001	16	255	0.002	16	255	0.003
13:00 - 14:00	16	255	0.002	16	255	0.001	16	255	0.003
14:00 - 15:00	16	255	0.001	16	255	0.002	16	255	0.003
15:00 - 16:00	16	255	0.001	16	255	0.002	16	255	0.003
16:00 - 17:00	16	255	0.002	16	255	0.001	16	255	0.003
17:00 - 18:00	16	255	0.000	16	255	0.000	16	255	0.000
18:00 - 19:00	16	255	0.000	16	255	0.000	16	255	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.014			0.015			0.029

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PSVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.000	16	255	0.000	16	255	0.000
08:00 - 09:00	16	255	0.000	16	255	0.000	16	255	0.000
09:00 - 10:00	16	255	0.000	16	255	0.000	16	255	0.000
10:00 - 11:00	16	255	0.000	16	255	0.000	16	255	0.000
11:00 - 12:00	16	255	0.000	16	255	0.000	16	255	0.000
12:00 - 13:00	16	255	0.000	16	255	0.000	16	255	0.000
13:00 - 14:00	16	255	0.000	16	255	0.000	16	255	0.000
14:00 - 15:00	16	255	0.000	16	255	0.000	16	255	0.000
15:00 - 16:00	16	255	0.000	16	255	0.000	16	255	0.000
16:00 - 17:00	16	255	0.000	16	255	0.000	16	255	0.000
17:00 - 18:00	16	255	0.000	16	255	0.000	16	255	0.000
18:00 - 19:00	16	255	0.000	16	255	0.000	16	255	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL CYCLISTS

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.004	16	255	0.007	16	255	0.011
08:00 - 09:00	16	255	0.005	16	255	0.008	16	255	0.013
09:00 - 10:00	16	255	0.000	16	255	0.001	16	255	0.001
10:00 - 11:00	16	255	0.002	16	255	0.003	16	255	0.005
11:00 - 12:00	16	255	0.002	16	255	0.003	16	255	0.005
12:00 - 13:00	16	255	0.003	16	255	0.004	16	255	0.007
13:00 - 14:00	16	255	0.002	16	255	0.003	16	255	0.005
14:00 - 15:00	16	255	0.002	16	255	0.003	16	255	0.005
15:00 - 16:00	16	255	0.005	16	255	0.004	16	255	0.009
16:00 - 17:00	16	255	0.007	16	255	0.007	16	255	0.014
17:00 - 18:00	16	255	0.011	16	255	0.008	16	255	0.019
18:00 - 19:00	16	255	0.008	16	255	0.006	16	255	0.014
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.051			0.057			0.108

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLE OCCUPANTSCalculation factor: **1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.094	16	255	0.424	16	255	0.518
08:00 - 09:00	16	255	0.153	16	255	0.639	16	255	0.792
09:00 - 10:00	16	255	0.179	16	255	0.217	16	255	0.396
10:00 - 11:00	16	255	0.157	16	255	0.200	16	255	0.357
11:00 - 12:00	16	255	0.165	16	255	0.198	16	255	0.363
12:00 - 13:00	16	255	0.202	16	255	0.194	16	255	0.396
13:00 - 14:00	16	255	0.212	16	255	0.206	16	255	0.418
14:00 - 15:00	16	255	0.212	16	255	0.244	16	255	0.456
15:00 - 16:00	16	255	0.418	16	255	0.232	16	255	0.650
16:00 - 17:00	16	255	0.425	16	255	0.235	16	255	0.660
17:00 - 18:00	16	255	0.496	16	255	0.227	16	255	0.723
18:00 - 19:00	16	255	0.428	16	255	0.262	16	255	0.690
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.141			3.278			6.419

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PEDESTRIANS

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.016	16	255	0.030	16	255	0.046
08:00 - 09:00	16	255	0.026	16	255	0.103	16	255	0.129
09:00 - 10:00	16	255	0.034	16	255	0.038	16	255	0.072
10:00 - 11:00	16	255	0.030	16	255	0.032	16	255	0.062
11:00 - 12:00	16	255	0.027	16	255	0.028	16	255	0.055
12:00 - 13:00	16	255	0.030	16	255	0.026	16	255	0.056
13:00 - 14:00	16	255	0.022	16	255	0.029	16	255	0.051
14:00 - 15:00	16	255	0.033	16	255	0.044	16	255	0.077
15:00 - 16:00	16	255	0.094	16	255	0.044	16	255	0.138
16:00 - 17:00	16	255	0.069	16	255	0.033	16	255	0.102
17:00 - 18:00	16	255	0.053	16	255	0.031	16	255	0.084
18:00 - 19:00	16	255	0.036	16	255	0.039	16	255	0.075
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.470			0.477			0.947

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL BUS/TRAM PASSENGERSCalculation factor: **1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.000	16	255	0.010	16	255	0.010
08:00 - 09:00	16	255	0.000	16	255	0.016	16	255	0.016
09:00 - 10:00	16	255	0.001	16	255	0.008	16	255	0.009
10:00 - 11:00	16	255	0.002	16	255	0.002	16	255	0.004
11:00 - 12:00	16	255	0.002	16	255	0.003	16	255	0.005
12:00 - 13:00	16	255	0.002	16	255	0.002	16	255	0.004
13:00 - 14:00	16	255	0.004	16	255	0.003	16	255	0.007
14:00 - 15:00	16	255	0.003	16	255	0.003	16	255	0.006
15:00 - 16:00	16	255	0.014	16	255	0.006	16	255	0.020
16:00 - 17:00	16	255	0.016	16	255	0.006	16	255	0.022
17:00 - 18:00	16	255	0.009	16	255	0.002	16	255	0.011
18:00 - 19:00	16	255	0.010	16	255	0.004	16	255	0.014
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.063			0.065			0.128

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL RAIL PASSENGERS

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.001	16	255	0.004	16	255	0.005
08:00 - 09:00	16	255	0.000	16	255	0.007	16	255	0.007
09:00 - 10:00	16	255	0.000	16	255	0.003	16	255	0.003
10:00 - 11:00	16	255	0.000	16	255	0.001	16	255	0.001
11:00 - 12:00	16	255	0.000	16	255	0.001	16	255	0.001
12:00 - 13:00	16	255	0.000	16	255	0.001	16	255	0.001
13:00 - 14:00	16	255	0.001	16	255	0.000	16	255	0.001
14:00 - 15:00	16	255	0.000	16	255	0.000	16	255	0.000
15:00 - 16:00	16	255	0.003	16	255	0.001	16	255	0.004
16:00 - 17:00	16	255	0.003	16	255	0.000	16	255	0.003
17:00 - 18:00	16	255	0.005	16	255	0.001	16	255	0.006
18:00 - 19:00	16	255	0.004	16	255	0.000	16	255	0.004
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.017			0.019			0.036

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL COACH PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.000	16	255	0.000	16	255	0.000
08:00 - 09:00	16	255	0.000	16	255	0.000	16	255	0.000
09:00 - 10:00	16	255	0.000	16	255	0.000	16	255	0.000
10:00 - 11:00	16	255	0.000	16	255	0.000	16	255	0.000
11:00 - 12:00	16	255	0.000	16	255	0.000	16	255	0.000
12:00 - 13:00	16	255	0.000	16	255	0.000	16	255	0.000
13:00 - 14:00	16	255	0.000	16	255	0.000	16	255	0.000
14:00 - 15:00	16	255	0.000	16	255	0.000	16	255	0.000
15:00 - 16:00	16	255	0.000	16	255	0.000	16	255	0.000
16:00 - 17:00	16	255	0.000	16	255	0.000	16	255	0.000
17:00 - 18:00	16	255	0.000	16	255	0.000	16	255	0.000
18:00 - 19:00	16	255	0.000	16	255	0.000	16	255	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.001	16	255	0.014	16	255	0.015
08:00 - 09:00	16	255	0.000	16	255	0.023	16	255	0.023
09:00 - 10:00	16	255	0.001	16	255	0.011	16	255	0.012
10:00 - 11:00	16	255	0.002	16	255	0.003	16	255	0.005
11:00 - 12:00	16	255	0.002	16	255	0.005	16	255	0.007
12:00 - 13:00	16	255	0.002	16	255	0.004	16	255	0.006
13:00 - 14:00	16	255	0.004	16	255	0.003	16	255	0.007
14:00 - 15:00	16	255	0.003	16	255	0.003	16	255	0.006
15:00 - 16:00	16	255	0.018	16	255	0.006	16	255	0.024
16:00 - 17:00	16	255	0.019	16	255	0.006	16	255	0.025
17:00 - 18:00	16	255	0.014	16	255	0.003	16	255	0.017
18:00 - 19:00	16	255	0.014	16	255	0.004	16	255	0.018
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.080			0.085			0.165

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL PEOPLE

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.115	16	255	0.476	16	255	0.591
08:00 - 09:00	16	255	0.184	16	255	0.773	16	255	0.957
09:00 - 10:00	16	255	0.215	16	255	0.267	16	255	0.482
10:00 - 11:00	16	255	0.192	16	255	0.238	16	255	0.430
11:00 - 12:00	16	255	0.196	16	255	0.234	16	255	0.430
12:00 - 13:00	16	255	0.238	16	255	0.227	16	255	0.465
13:00 - 14:00	16	255	0.241	16	255	0.242	16	255	0.483
14:00 - 15:00	16	255	0.252	16	255	0.294	16	255	0.546
15:00 - 16:00	16	255	0.535	16	255	0.286	16	255	0.821
16:00 - 17:00	16	255	0.520	16	255	0.282	16	255	0.802
17:00 - 18:00	16	255	0.574	16	255	0.268	16	255	0.842
18:00 - 19:00	16	255	0.487	16	255	0.312	16	255	0.799
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.749			3.899			7.648

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL Servicing Vehicles

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

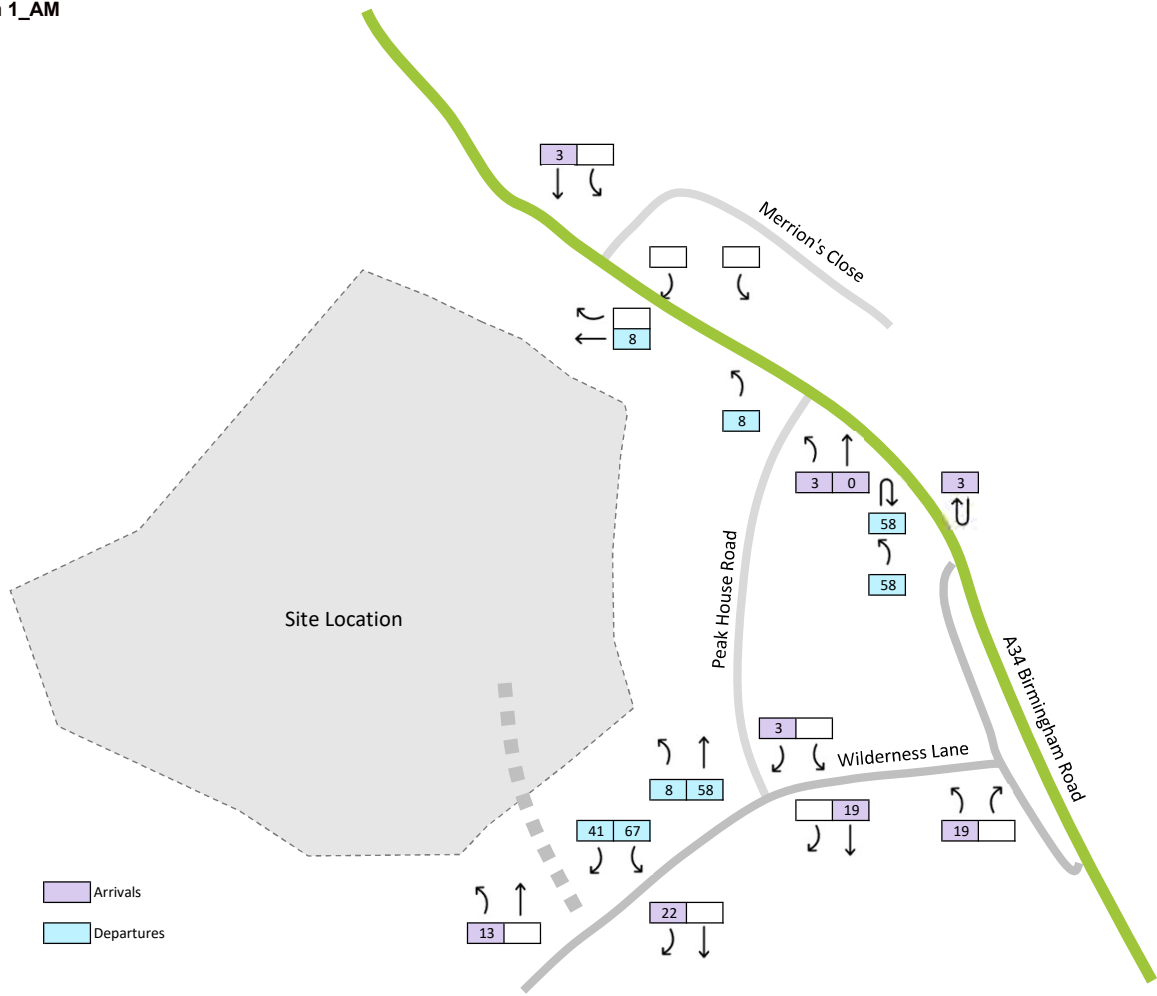
Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	255	0.009	16	255	0.004	16	255	0.013
08:00 - 09:00	16	255	0.009	16	255	0.006	16	255	0.015
09:00 - 10:00	16	255	0.013	16	255	0.009	16	255	0.022
10:00 - 11:00	16	255	0.010	16	255	0.010	16	255	0.020
11:00 - 12:00	16	255	0.010	16	255	0.012	16	255	0.022
12:00 - 13:00	16	255	0.009	16	255	0.009	16	255	0.018
13:00 - 14:00	16	255	0.013	16	255	0.014	16	255	0.027
14:00 - 15:00	16	255	0.008	16	255	0.014	16	255	0.022
15:00 - 16:00	16	255	0.008	16	255	0.008	16	255	0.016
16:00 - 17:00	16	255	0.006	16	255	0.006	16	255	0.012
17:00 - 18:00	16	255	0.004	16	255	0.006	16	255	0.010
18:00 - 19:00	16	255	0.003	16	255	0.004	16	255	0.007
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.102			0.102			0.204

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

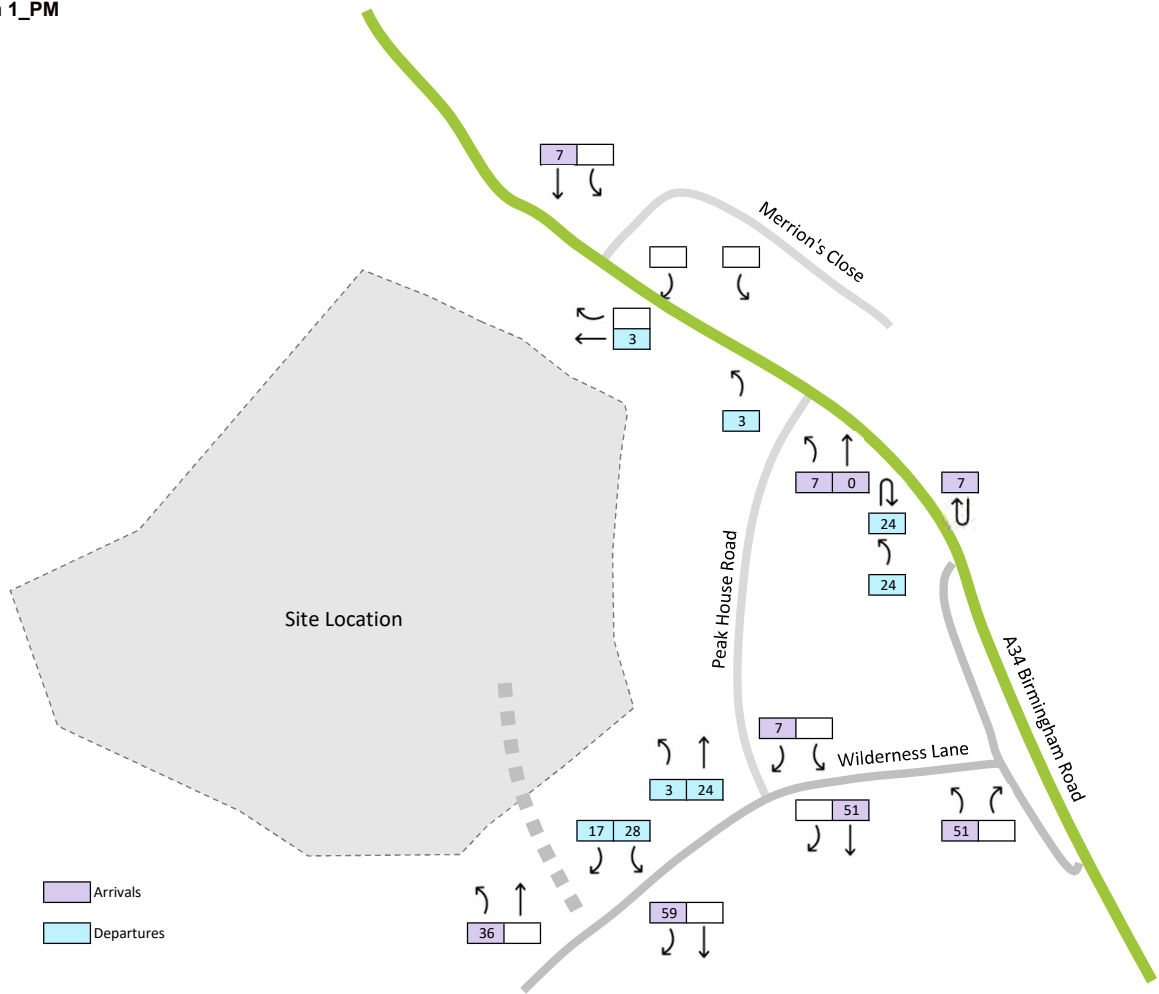
To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

Appendix C Traffic Flow Diagrams

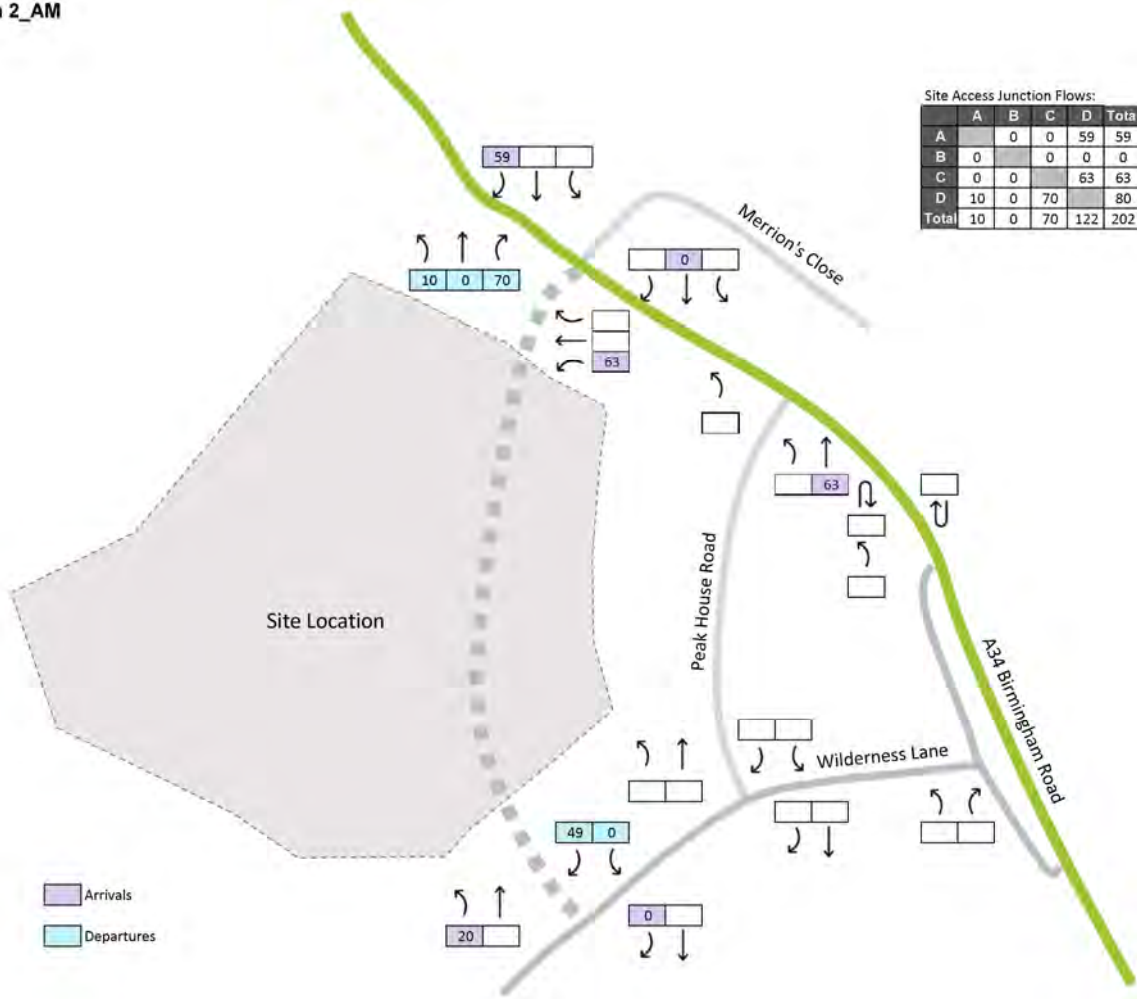
Option 1_AM



Option 1_PM



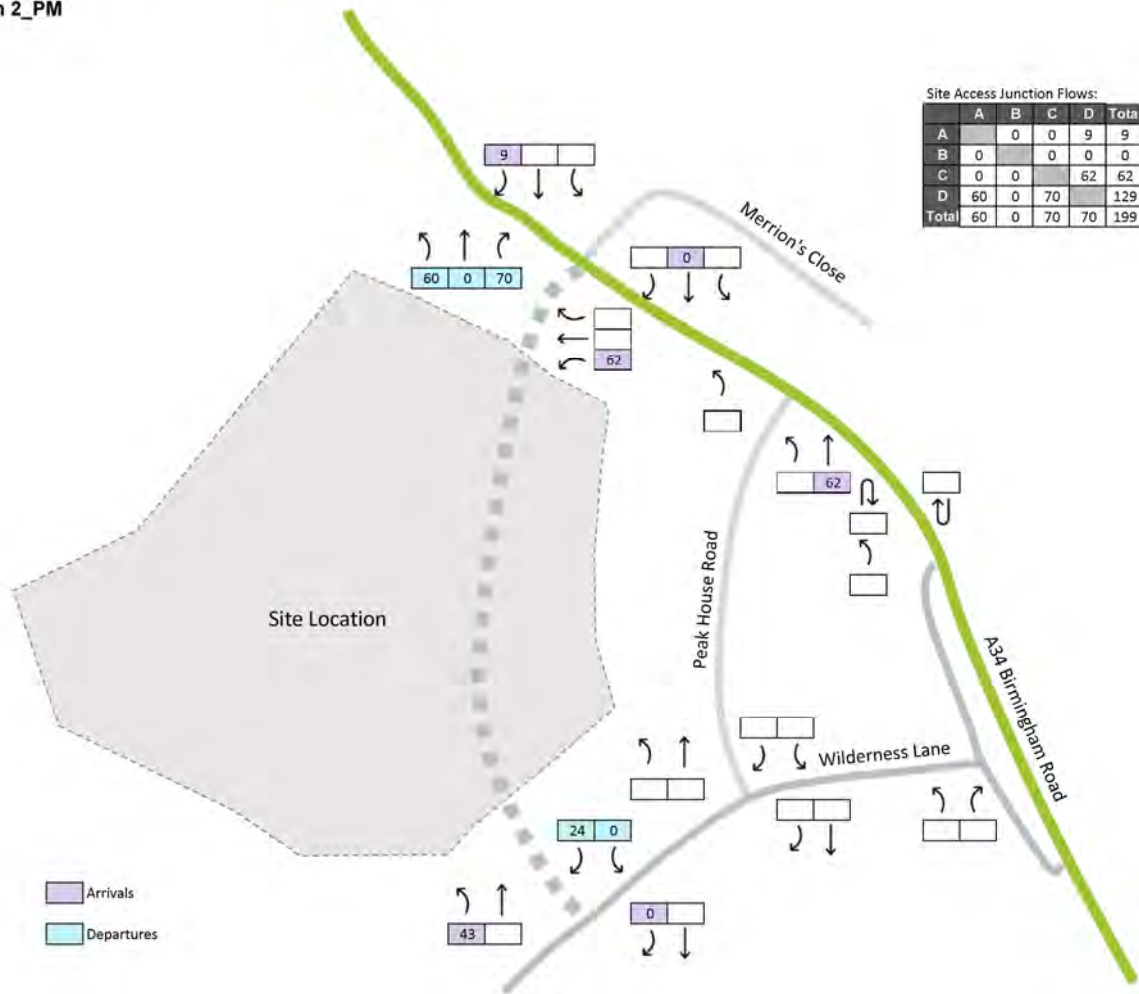
Option 2_AM



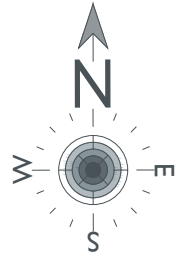
Site Access Junction Flows:

	A	B	C	D	Total
A		0	0	59	59
B	0		0	0	0
C	0	0		63	63
D	10	0	70		80
Total	10	0	70	122	202

Option 2_PM



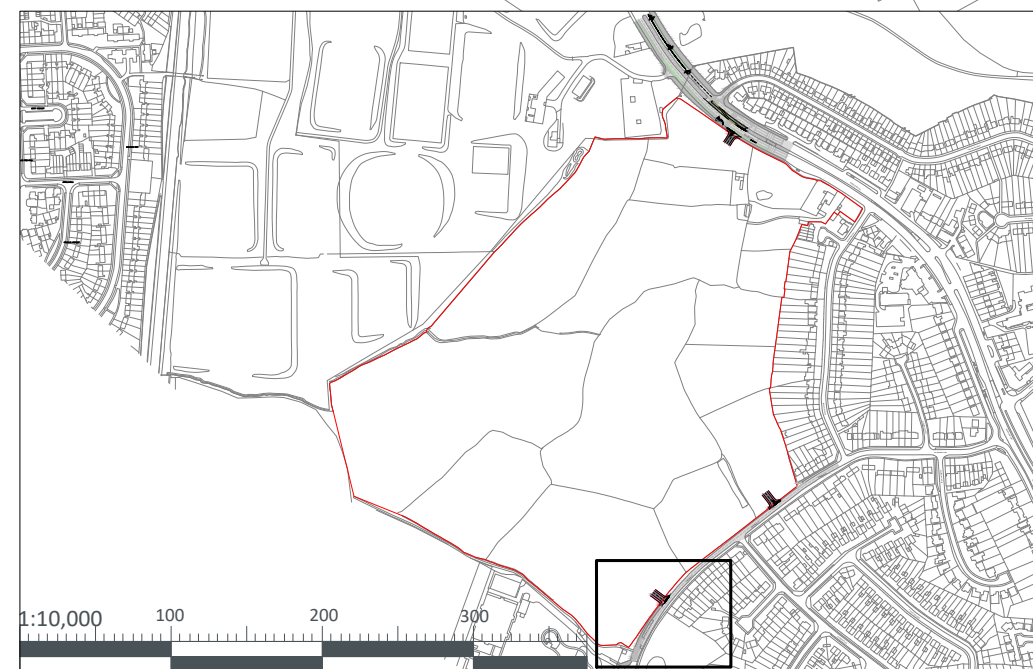
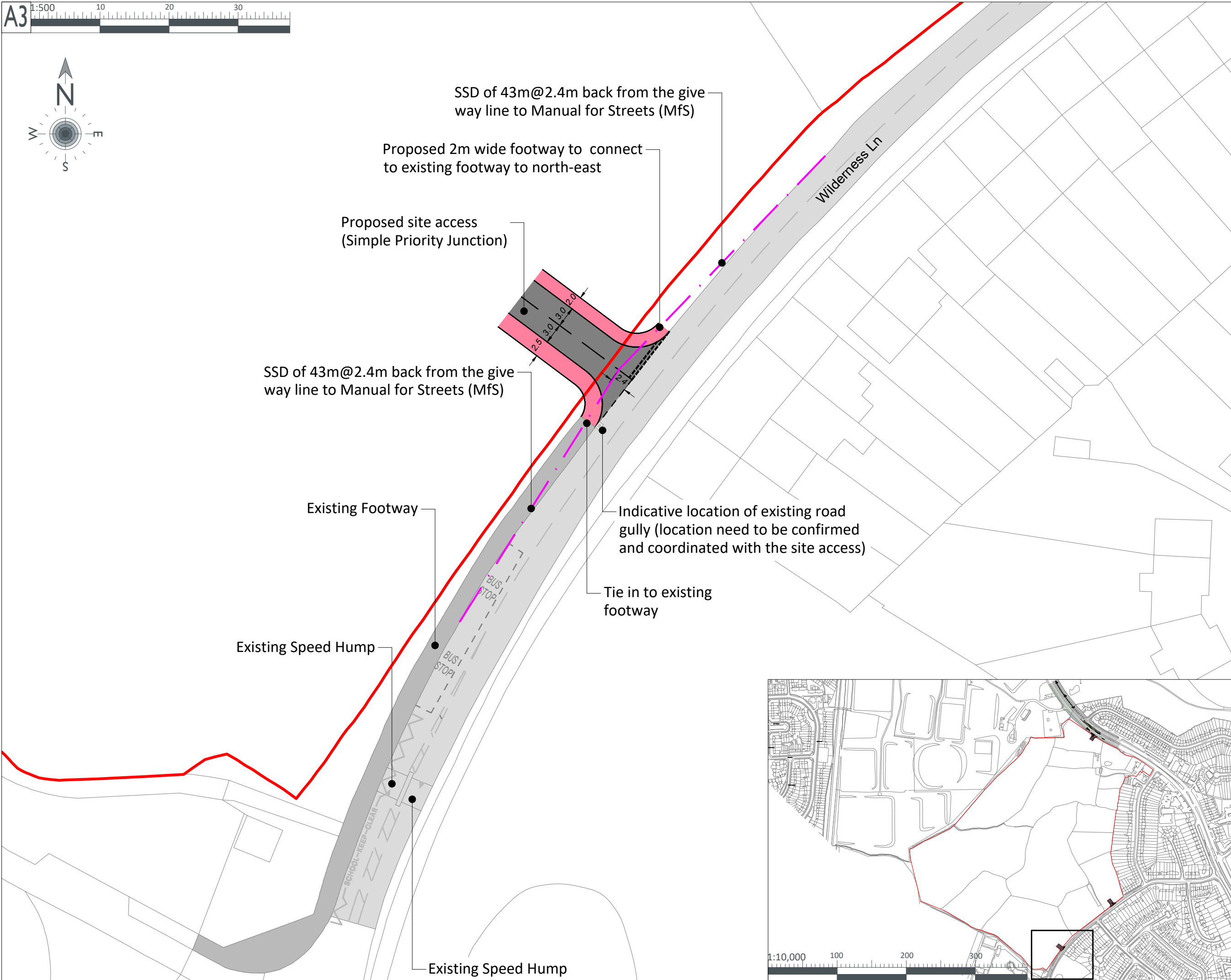
Appendix D Site Access Drawings



NOTES
 These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9

- KEY:**
- Site Boundary
 - Existing Carriageway
 - Existing Footway
 - Proposed Carriageway Works
 - Proposed Footway Works
 - Proposed Kerb Line
 - Stopping Sight Distance (SSD) to Manual for Streets (MfS)
 - Existing Road Gully

- Drawing Notes:**
1. The purpose of this drawing is to illustrate possible development access option to proposed development from Wilderness Lane.
 2. The design has been undertaken in accordance with Manual for Streets.
 3. Junction visibility is based on posted speed limit of 30mph.
 4. The design is based on OS Mapping.
 5. The design is limited to 2D at this stage.
 6. Highway boundary information is not available at the time of producing the design and will require verification.
 7. Provision of footway could be provided inside the site to reduce the impact on hedgerow.



REV	DATE	REVISION NOTE	BY

PJA
 Seven House - High Street
 Longbridge - Birmingham
 B31 2JQ - Tel: 0121 475 0234
 Birmingham - Bristol
 Exeter - London - Reading
 pja.co.uk

CLIENT
HIMOR

PROJECT
Great Barr Sandwell

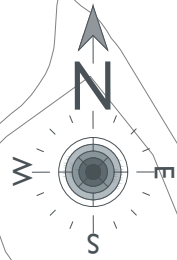
DRAWING TITLE
Proposed Site Access Priority Junction - South Wilderness Lane

DRAWING ISSUE STATUS
INFORMATION

PJA JOB No. SUB-CODE DRAWING NO. REVISION
04834 - SK - 0002 - P1

Revision Letter : P - Prelim / A - Approval / T - Tender / C - Construction
 BIM DRAWING REFERENCE

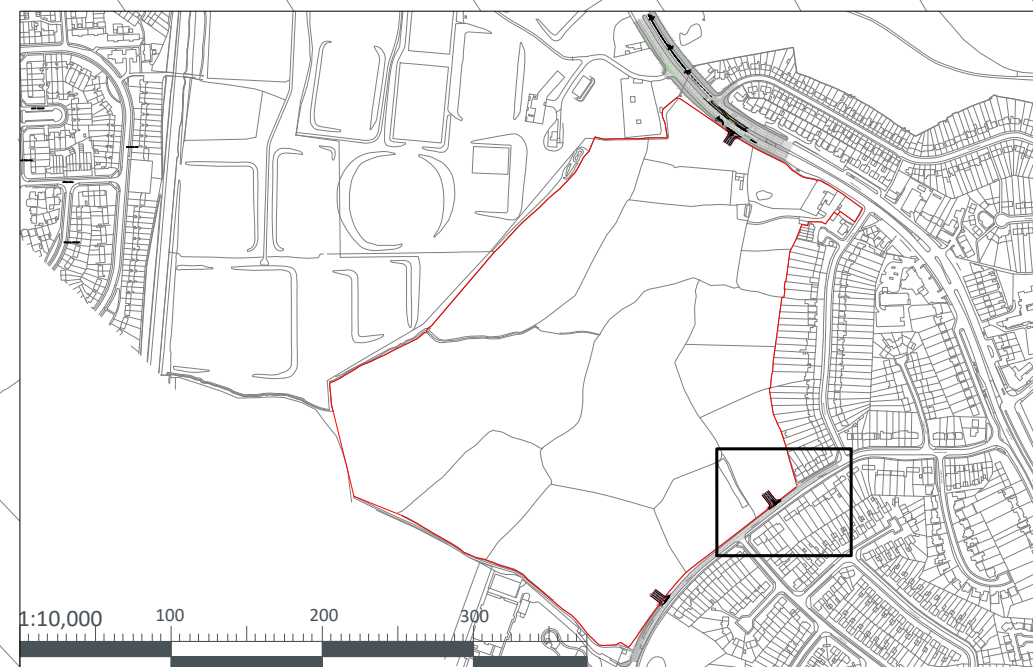
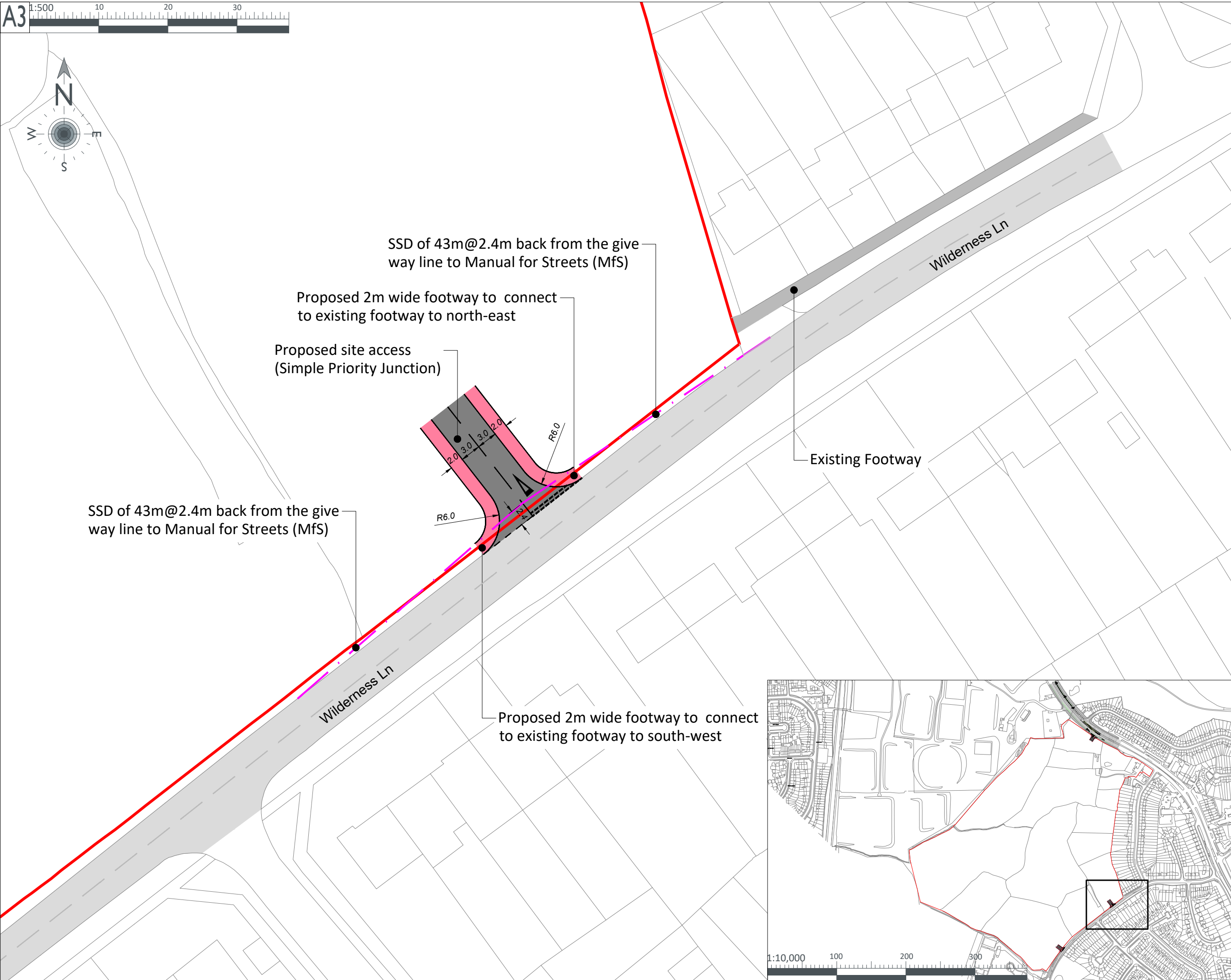
SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:500	AH		14/05/20



NOTES
 These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9

- KEY:**
- Site Boundary
 - Existing Carriageway
 - Existing Footway
 - Proposed Carriageway Works
 - Proposed Footway Works
 - Proposed Kerb Line
 - - - Stopping Sight Distance (SSD) to Manual for Streets (MFS)

- Drawing Notes:**
1. The purpose of this drawing is to illustrate possible development access option to proposed development from Wilderness Lane.
 2. The design has been undertaken in accordance with Manual for Streets.
 3. Junction visibility is based on posted speed limit of 30mph.
 4. The design is based on OS Mapping.
 5. The design is limited to 2D at this stage.
 6. Highway boundary information is not available at the time of producing the design and will require verification.
 7. Provision of footway could be provided inside the site to reduce the impact on hedgerow.



REV	DATE	REVISION NOTE	BY

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 Birmingham - Bristol
 Exeter - London - Reading
 pja.co.uk

HIMOR
 PROJECT

Great Barr
 Sandwell

**Proposed Site Access
 Priority Junction - North
 Wilderness Lane**
 DRAWING TITLE

INFORMATION
 DRAWING ISSUE STATUS

PJA JOB No. SUB-CODE DRAWING NO. REVISION
04834 - SK - 0001 - P1

Revision Letter: P - Prelim / A - Approval / T - Tender / C - Construction
 BIM DRAWING REFERENCE

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:500	AH		14/05/20

Appendix 5: Biodiversity Technical Note (October 2021)

Ecology Solutions (Manchester) Limited

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info@ecologysolutions.co.uk
www.ecologysolutions.co.uk



8694M: LAND AT BIRMINGHAM ROAD, GREAT BARR,
SANDWELL

BIODIVERSITY TECHNICAL NOTE

Introduction

1. This Technical Note has been produced on behalf of HIMOR in relation to the promotion of land at Birmingham Road, Great Barr, Sandwell (hereafter referred to as the site) for residential led development.
2. Specifically, this note serves to summarise the findings of ecological work undertaken at the site to date, to identify how existing ecological assets may be safeguarded, and to provide further details on how significant and realistic net gains in biodiversity may be achieved.

Summary: Ecological Assessment

3. Ecology Solutions (Manchester) Limited was commissioned in January 2020 by HIMOR to undertake an Ecological Assessment of the site. The aim of the ecological work was to determine any potential ecological constraints associated with the site, as well as identify opportunities for enhancement as part of an appropriately designed development.

Habitats

4. The site comprises predominantly of several improved agricultural fields used for silage production, and horse paddocks which are well intersected by field boundary hedgerows.
5. The majority of the site comprises species-poor grassland fields which are botanically unremarkable and are not deemed to be of any particular ecological significance. No specific mitigation would be required to account for losses, and indeed there is ample scope for enhancements through the adoption of an appropriate management regime for retained habitats.
6. A subset of the fields (F3, F5 and F14 – see Plan ECO1) are of greater botanical interest on account that they support either Great Burnet, a species identified as 'very rare' in the region, or otherwise marshy grassland habitats which include for Oval Sedge, an uncommon species in the locality. Notwithstanding that overall, these fields support only a modest range of herbs, they are deemed to be of relatively high value in the context of the site. Noting the prevalence of Great

Burnet in F3, as well as the local rarity of this species, this field is deemed to be of some value in the local context.

7. The hedgerow network and associated trees are also deemed to be of higher value in the context of the site, with a good proportion (50%) of the constituent features assessed as 'Important' under the Hedgerow Regulations on nature conservation grounds. Whilst many of the hedgerows support only a modest range of species, the network overall is considered to be of value in a local context. In this regard, the hedge network is likely to satisfy the criteria to achieve Sites of Local Importance for Nature Conservation (SLINC) status.
8. Of the ponds on site, only P1 is deemed to be of some ecological value, and this only within the context of the site. P2 is more representative of seasonally inundated grassland and is of no significant interest.
9. As summarised in 'The Proposals' section below, emerging proposals have been carefully informed by the presence of higher value habitats, such that the majority of these habitats can be retained and indeed overall ecological enhancements secured for the site. Indeed, the presence of higher value habitats has provided a framework around which the emerging proposals have been designed. Amongst other measures, the emerging proposals would allow for a net gain higher value meadow grassland, as well as the retention, management and enhancement of the vast majority of the hedgerow network.

Fauna

10. Ecology Solutions undertook a suite of faunal surveys in the 2020 survey season, with this including for the completion of survey work for the following faunal groups:
 - Badger
 - Bats
 - Preliminary ground based inspections of trees
 - Transect surveys and the deployment of static detectors on a monthly basis between May – October
 - Reptiles (presence absence surveys - seven visits)
 - Breeding bird surveys, with visits in late March, May and June
 - Great Crested Newt (GCN) eDNA surveys of on-site ponds
11. Given the habitats present and the sites locality, the potential presence of other protected species (such as Dormouse, Otter or Water Vole) can be safely scoped out without the completion of specific survey work.
12. Specific surveys found no evidence of GCN, reptiles or Badger within the site.
13. Regarding Bats, a small number of trees were deemed potentially suitable for roosting and these are capable of being retained and safeguarded as part of emerging proposals. Bat activity surveys completed throughout 2020 identified relatively limited levels of bat activity across the site, with this activity dominated by common and widespread bat species. Bat activity was unsurprisingly focused along the existing hedgerow networks, with little activity noted across open fields. Activity was noted to be higher in the south of the site, including the hedgerows bounding F3, otherwise overall activity was broadly comparable across the hedgerow network.

14. Regarding breeding birds, the hedgerow and tree network within the site supports a modest range of breeding birds, albeit these assemblages were typical for an agricultural landscape and were not deemed to be of heightened interest for the local area. The remaining habitats within the site, including the extensive areas of grassland, were of very limited ornithological interest and did not support any notable breeding activity.
15. As for habitats above, the emerging proposals for the site have been carefully informed by the presence or potential presence of protected and notable species, allowing for habitats of heightened functional importance to be retained and buffered from development, whilst readily achievable opportunities for enhancement are identified (again see 'The Proposals' section below).

Designated Sites

16. There are no statutory designations of nature conservation value within or immediately adjacent to the site. The closest statutory designated site is Merrion's Wood Local Nature Reserve (LNR) and is located approximately 50 metres northeast of the site boundary, on the far side of the A34 dual carriageway. Several other LNRs are also present in the local area, albeit all are well distanced from the site and with roads and urban development between.
17. There is currently a Site of Local Important Nature Conservation (SLINC) designation covering part of the site. It primarily relates to the network of hedgerows running throughout the site, in addition to a small SLINC field parcels in the northeast and waterbody and surrounding wetland habitat in the southeast of the site. The SLINC citation notes the presence of 'traditional small fields with a mixture of marshy, neutral and some calcareous grassland' as well as 'an extensive network of hedgerows, several of high species diversity'. The ponds are not described in the SLINC citation.
18. Updated survey work undertaken by Ecology Solutions has reaffirmed the value of the hedgerow network to remain broadly as described within the SLINC designation. However, areas previously identified as higher value grassland (within F11) have since succumbed to ecological succession and now comprise significant Bramble scrub of low ecological value.

Proposed SINC designation

19. Sandwell Council resolved to approve the upgrade and extension of the designation of entire site to a Site of Important Nature Conservation (SINC) at Sandwell Council's Cabinet meeting on 7 August 2019. The decision was based on the findings of the Birmingham and Black Country Local Sites Assessment Report (19 November 2018) (the 'Site Assessment Report'), undertaken by the Birmingham and Black Country Wildlife Trust (the 'WT').
20. Enclosed at **Appendix 1** is a letter Turley sent to Sandwell Council regarding the proposed designation. In summary, we have substantial concerns regarding the designation of Peak House Farm as a SINC. Firstly, the process for making the designation is not transparent and has not been subject to appropriate public consultation or independent scrutiny. Also the status of the designation is not clear as it has not been formalised in any Policies Map. The designations validity is therefore questionable, as is how much weight, if any, it can be given to it.

21. Secondly, the assessment of the site undertaken by the WT is seriously flawed, it significantly overplays the site's ecological value. Its findings on the site's ecological value are not evidenced, it over values the grassland habitat, its assessment of naturalness is inaccurate, and it over scores species rarity. We contend that the site's value is lower than that stated in the Assessment and accordingly would not meet the criteria for it being made a SINC.
22. In contrast, the current SLINC citation, which related specifically towards habitats of higher value such as the hedgerow network, is considered broadly proportional to the sites interest (with the exception of F11 which has declined in interest).

The Proposals

Habitats

23. The emerging proposals have been guided by existing habitats/features from the outset, with specific ecology work undertaken to identify those habitats of heightened interest such that they can be retained, buffered and enhanced as part of the proposals. The result of this ecology led approach is that a high quality Green Infrastructure network has been identified as feasible for the proposals, with this forming the 'backbone' around which new development is proposed. Key habitat features contained within this Green Infrastructure network include:
- The existing hedgerow network, the vast majority of which is to be retained;
 - Areas of grassland identified of highest ecological interest (not least the entirety of F3);
 - Waterbody P1
24. Moreover, emerging proposals have given careful consideration as to how habitat creation and/or enhancement can achieve additional opportunities for betterment, with emerging proposals to secure the following:
- Substantial areas of informal open space to be secured as Country Park habitat, with long-term management to be secured such that the ecological value of habitats can be enhanced in the long-term.
 - Habitat creation / enhancement to achieve:
 - Substantial net gains in high quality grassland habitats, with significant areas of species-poor grassland to be enhanced and managed as species-rich meadow.
 - Opportunities for localised translocation of higher value grassland, should impacts arise.
 - Extensive wetland habitat creation, to include open water habitats and wet meadow grassland.
 - Retention, bolster planting and instigation of long-term management of the existing hedge network to ensure good ecological condition in the long-term.
25. The instigation of long-term, biodiversity led management is of particular importance and merit, offering an opportunity to secure a biodiversity legacy for the site and reverse the gradual ecological decline of grassland habitats evident from unsympathetic agricultural management (i.e. the no development scenario). Indeed, the declines evident through a previous lack of targeted management are already apparent within the site, not least within F11, where previous interest has been lost to scrub succession. In the absence of targeted management, the value

of other (remnant) higher quality grassland habitats are equally likely to diminish in extent and quality in the short to medium term.

26. In aligning with the above aspirations, the emerging proposals for habitat retention and creation on site would adopt biodiversity net gain as a guiding principle, ensuring that an overall uplift in biodiversity value of at least 10% is achieved. (see 'Biodiversity Net Gain' below).
27. Of equal importance, emerging proposals seek to ensure the sites functional importance can be retained and enhanced, not least through the creation of extensive high quality habitat which will ensure a continuous and diverse habitat corridor along the full western boundary of the site.
28. In achieving these principles, it is not only considered that the existing SLINC value of on-site habitats may be retained (noting that the value of F11 has already been lost), but that areas of proposed Country Park would attain sufficient ecological quality that they may qualify as SINC habitat in future years.

Biodiversity Net Gain

29. The site's size, location and existing land uses ensure there are opportunities to secure a substantial uplift in the nature conservation value within the site, realising it as a valuable, functional component of the wider landscape.
30. As part of emerging development proposals, two concept development options included in the vision document have been subject to initial biodiversity net gain appraisals and are considered individually below.
31. In undertaking this initial assessment work, it is noted that each option would secure the guiding principles set out above (see paragraphs 23 and 24). In doing so, these options (and indeed any future scheme iterations) would not only secure significant opportunities for enhancement, they would do so in a manner that would achieve locally appropriate habitat creation / enhancement measures.
32. **Option 1** proposes a limited area of new built development off Wilderness Lane, between Peak House Road and the Q3 Academy. The new housing would be developed in parcels contained by a structure of the retained hedgerows and trees. The moat feature (P1) and adjacent field (F1) would be retained as an area of green infrastructure. Moreover, both F3 and F14, supporting areas of relatively higher quality grassland, would be fully retained and enhanced. The northern part of the site would remain open and undeveloped with the part to the north retained for sensitive agricultural management, and the western part becoming an Country Park with dedicated biodiversity led management secured. This option follows the existing urban form and retains a large open area to the north.
33. Initial appraisal work indicates that a 10% Biodiversity Net Gain is readily achievable as part of Option 1 in the vision document.
34. **Option 2** provides a larger area of development across the eastern and southern part of the site. The option includes the land to be subject to development as shown on Option 1, but also includes the land on the more northerly fields and allows a route through the site between Wilderness Lane and the A34. Again, the field containing the moat (P1) has been kept as part of the green infrastructure, and a range of green links could be based around the retained field structure. Fields located in the western section of the site, including F3 and a proportion of

F14, are to be retained and subject to significant ecological enhancements and would again benefit from long-term biodiversity led management.

35. Again, initial assessment work indicates that a 10% Biodiversity Net Gain is readily achievable as part of Option 2 in the vision document.

Habitat & Biodiversity Net Gain Summary

36. In summary, based on the ecological survey work undertaken, and with regard to the guiding principles set out above, it is considered the adoption of a suitable landscaping scheme for the site would ensure the biodiversity value of the habitats present are retained and indeed enhanced as part of any development.
37. In functional terms, the protection, restoration and enhancement of valuable biodiversity assets (such as the mature hedgerows which will benefit from new planting to restore these gappy features or improve species diversity) will enhance the value of the site as a linking habitat between biodiversity important sites within the wider landscape and will provide new and/or enhanced opportunities for faunal species present in the local area.
38. The biodiversity value of these habitats would be further enhanced through the establishment of an appropriate management regime, and would form an integral component of the emerging development proposals for the site.
39. It is considered that subject to above principles. A biodiversity net gain of at least 10% would be achievable, whilst the qualitative enhancement to habitats would moreover allow for substantial areas of the site to attain SINC quality in future years.

Fauna

40. In regards faunal species, the survey work undertaken identified the site as supporting a limited range of protected and notable species. Surveys found no evidence of reptiles, GCN or Badgers. The breeding bird assemblage was of a modest nature and typical for the habitats present, whilst only a low range of bats were recorded. It is possible the urbanised context of the site, with major roads and built form segregating the site from much of the wider landscape, has inhibited or tempered its colonisation by many of these species' groups. Moreover, the past (and ongoing) agricultural management of the fields further tempers the sites suitability for the above faunal groups.
41. Through adoption of appropriate best practice measures and readily achievable site-specific safeguards, notable and protected species may be fully safeguarded during the construction and operational phases of the development. Indeed, the proposals offer a mechanism to enhance the value of the site for a range of Priority Species and local conservation priorities, ensuring the favourable conservation status of faunal species to be retained and enhanced.
42. As for habitats above, the presence or potential presence of protected and notable species has been given careful regard in identifying appropriate opportunities for development at the site. Reflecting this, the proposals allow the retention of higher value habitats and features for faunal species, not least:
- The retention of the vast majority of the hedgerow network, of value to foraging and commuting bats, as well as foraging and nesting birds;

- Retention and buffering of trees with the potential to support roosting bats;
 - Retention of higher value grassland, of value to invertebrates and small mammals;
 - Retention of pond P1, ensuring opportunities for common amphibians present in the local area;
 - Creation of extensive meadow habitat and new wetland habitat, offering enhanced foraging opportunities for bats and birds, as well as optimal habitat for reptiles, should these be present in the wider area and colonise the site in future years.
43. Through the adoption of appropriate safeguards during construction, alongside adherence to the above principle for habitat creation and enhancement, it is considered that the value of the site to faunal species and assemblages can be retained and enhanced as part of an appropriately designed scheme.

Summary & Conclusion

44. From Ecology Solutions' site survey and the background information obtained, there is no evidence to suggest there are any overriding ecological constraints which would prevent the site being promoted for development. In reaching this conclusion, it is noted that the proposed designation of the site as a SINC is unwarranted and is at odds with the true ecological value of the site.
45. Measures to safeguard the existing features of value (including the hedgerow network which forms the basis of the SLINC citation) can be safeguarded as part of any emerging development proposals, with mitigation and enhancement measures readily achievable to off-set potential impacts.
46. In conclusion, it is considered that any forthcoming proposals will conform to relevant national and local policy with respect to nature conservation and biodiversity and further realise an enhancement over the current situation, contributing to local biodiversity targets for the area and achieving measurable net gains in biodiversity.
47. Furthermore, opportunities exist to not only retain features of existing value within the SLINC, but to enhance extensive areas of adjoining habitat such that these may attain SINC status in future years.

Plan ECO1

Habitat Features



- KEY:**
- SITE BOUNDARY
 - BUILDING
 - FENCE
 - BARE GROUND
 - HEDGEROW
 - TREE
 - WOODLAND
 - SCRUB
 - POND
 - MARSHY GRASSLAND
 - SPECIES-POOR GRASSLAND
 - RUDERAL



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8694M: BIRMINGHAM ROAD,
GREAT BARR, SANDWELL

PLAN ECO1: ECOLOGICAL FEATURES	Rev: A Jan 2021
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Appendix 1

Letter to Council Regarding SINC Designation

6 January 2020
Delivered by email

Mr Andy Miller
Sandwell Council
Regeneration and Economy
Sandwell Council House
Freeth Street
Oldbury
B89 3DE

Ref: HIMQ3001

Dear Andy

PEAK HOUSE FARM, GREAT BARR – RESPONSE TO WILDLIFE TRUST LOCAL SITE ASSESSMENT

We write on behalf of HIMOR (Land) Limited ('HIMOR') in respect to land at Peak House Farm, Great Barr and its recent designation as a Site of Important Nature Conservation ('SINC'). We are grateful for your time to discuss the matter when we met in October and now wish to record our substantial concerns regarding the validity of the designation in writing.

The Council resolved to approve the upgrade and extension of the designation of entire site to a SINC at Sandwell Council's Cabinet meeting on 7 August 2019; a small part of the site was previously designated a Site of Local Important Nature Conservation ('SLINC'). The decision was based on the findings of the Birmingham and Black Country Local Sites Assessment Report (19 November 2018) (the 'Site Assessment Report'), undertaken by the Birmingham and Black Country Wildlife Trust (the 'WT').

Our concerns relate to the process of making the designation and its status, and the findings of the Site Assessment Report which underpin the designation, which we discuss further below.

The process of making the designation

The process for making the designation is opaque, and was not subject to appropriate public consultation or independent scrutiny.

Firstly, no public consultation has been undertaken (certainly in recent times, since the publication of the National Planning Policy Framework in March 2012) on the methodology for assessing whether sites meet the criteria for being designated SINCs or SLINCs.

Secondly, no public consultation was undertaken on the decision to designate the site a SINC, including with the landowner. The WT, on behalf of the Black Country authorities, undertook the assessment in August 2018. When seeking access (on behalf of the WT) to the site in email correspondence on 16 May 2018, the Council indicated the purpose of the assessment was to "*form part of the evidence base for the Core Strategy Review*".

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The Site Assessment Report is dated 19 November 2018, although a copy was not provided to HIMOR by email until 30 April 2019. The covering email indicated the report was for our information and did not seek specific comment on the survey, the process, or the results. No reference in the email was made to the report being presented to the Birmingham and Black Country Local Sites Partnership Panel (who we understand are the body responsible for reviewing the findings of the assessment), or the Cabinet meeting on 7 August 2019. Indeed HIMOR was not informed the designation was being recommended to the Council's Cabinet.

Accordingly, the process fails to meet with the basic principles of consultation and natural justice. This calls into questions to the validity of the designation and significantly affects the weight that can be given to it in decision taking.

Status of the designation

It is unclear what policy status the designation carries. Although the recommendation to designate the site a SINC by the Council's Cabinet was supported, there is no Policies Map which formalises the designation. It is understood that the designation is unlikely to be formalised until the Policies Map is updated as part of any Part 2 Plan for Sandwell that follows the adoption of the Black Country Plan.

Findings of the Site Assessment Report

The Site Assessment Report has been used by the Council to assess the site against published SINC selection criteria contained in the '*Birmingham and Black Country Local Wildlife Sites – Guidance for Selection (March 2018)*' document.

The Guidance for Selection document notes that sites which score mostly 'high' against the relevant criteria will generally meet the threshold for SINC designation status. Those scoring mostly 'medium' will meet the threshold for SLINC status. In relation to the site and the relevant ecological criteria, it scored high on three criteria, a 'high / medium' score on three criteria and a medium score on one criterion. No explanation is provided as to why certain criteria have both a 'high / medium' score. With respect to the social criteria, it scored 'high' on two criteria, 'medium' on two criteria and 'low' on one criterion.

We have reviewed the Site Assessment Report and sought preliminary advice on its findings from a qualified ecologist, Ecology Solutions, who has visited the site. The assessment is flawed and significantly over plays the site's value for a number of reasons:

1. There is a lack of evidence in relation to the site's ecological value
2. The grassland habitat is over valued
3. The analysis of the site's 'naturalness' is inaccurate
4. The 'species rarity' criterion is over scored

We discuss these further below.

1. The evidence base

There is a significant emphasis within the assessment on the "unchanged" nature of the site, including the following examples:

- "...the field pattern...is thought to date from at least 1750 and potentially much earlier...an important surviving historic landscape..." (page 1)

- *“...typical farmland habitats which have been established on-site for over 250 years...”* (page 1)
- With reference to the site *“...the area has remained relatively unchanged for over 250 years...”* (page 1)
- *“...the site has been a working farm containing an irregular field system which may have been created at an early time...few changes have occurred on site with the majority [of] field boundaries having survived”* (page 3)

There is however no evidence to substantiate the above statements. In addition, although the field pattern may not have changed, the assessment fails to recognise that the management of the fields will have changed over that period with the grassland habitat indicating signs of agricultural improvement. The assessment represents only a snap shot in time. It is therefore disingenuous to assert that the site has been ‘unchanged’ for over 250 years; it is not supported by evidence.

2. The grassland habitat is over valued

The Site Assessment Report notes that most of the grassland habitat within the site contains *“low species and forb diversity”*, but fails to distinguish between grassland which is generally of low ecological value and other, potentially more valued, habitats within the site (such as the hedgerows and ponds). The analysis provides a blanket approach to the site with the same SINC value, rather than taking a more accurate and refined approach to evaluation and designation.

3. The analysis of the site’s ‘naturalness’ is inaccurate

The site has been evaluated as *“high”* for naturalness on the basis that (i) historical mapping shows that the survey area has remained relatively unchanged for over 250 years, (ii) that the site provides a typical rural farmland habitat with numerous native hedgerows, field drainage ponds and ditches and (iii) that the semi-natural habitats known to provide high quality connectivity across the surrounding landscape.

The Guidance for Selection document states that the concept of naturalness is one which considers the degree the site supports natural features or processes. The habitats have particular intrinsic value when they are least affected by modern human activity including the introduction of species, alteration in physical structure, physical disturbance to soils and the addition of soil nutrients. The Guidance for Selection document (page 6) goes on to state that the sites which tend to score highly are:

- (i) Those which have developed through consistent management over a very long period.
- (ii) Those where species colonisation has occurred through natural processes.
- (iii) Those which have been least influenced by human activity.
- (iv) Those that have developed on intrinsically nutrient-poor soils where there is a rarity or absence of species associated with anthropogenic disturbance.
- (v) Those where the associations between species, communities and habitats have developed and where these cannot easily be recreated.

We provide our preliminary response to these points below:

- (i) The species composition of the grassland habitats indicates modern agricultural management. They do not indicate *“consistent management over a very long period”*

which would result in more ecologically natural habitats. The Site Assessment Report does not reflect this.

- (ii) The grassland habitats have been significantly influenced by human activity; as evidenced by recent management and the species composition of the grassland. They are therefore not examples of those *“least influenced by human activity”*.
- (iii) Based on the species composition of the grassland, there is no indication that the soils are *“intrinsically nutrient poor”* and there are several examples of species associated with anthropogenic disturbance (including perennial rye grass, clovers and ‘weedy’ species such as nettle and hogweed).
- (iv) It is considered that the habitats and therefore the species and communities that they support could be easily created and are not *“irreplaceable habitat”* with reference to the National Planning Policy Framework definition (set out in the glossary at page 67).

Given the above it is unreasonably generous to attribute a ‘high’ score for naturalness, and the score is not supported by the published criteria.

It is widely accepted that ecology surveys remain valid for 12-24 months. This and the point made above demonstrate that the Site Assessment Report represents a snap shot in time. The Council will have to regularly update the assessment to ensure it remains valid.

4. The ‘species rarity’ criterion is over scored

The analysis provided for ‘species rarity’ states that *“...the majority of the flora species recorded on the site have been identified as frequent to common within Birmingham and the Black Country...”* with only a few notable species recorded; which is not unusual for any greenfield site. Despite this, the site has been assessed as ‘moderate / high’ score. This valuation fails to recognise that the majority of the flora is common and widespread or that those notable species recorded are not untypical of the majority of greenfield sites. In addition, there is no justification as to why a ‘split’ value has been given. It is not clear whether there are parts of the site which the assessment considers has high value and others moderate.

Summary

HIMOR has substantial concerns regarding the designation of Peak House Farm as a SINC. Firstly, the process for making the designation is not transparent and has not been subject to appropriate public consultation or independent scrutiny. Also the status of the designation is not clear as it has not been formalised in any Policies Map. The designations validity is therefore questionable, as is how much weight, if any, it can be given to it.

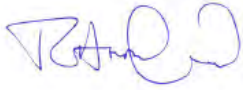
Secondly, the assessment of the site undertaken by the WT is seriously flawed, it significantly overplays the site’s ecological value. Its findings on the site’s ecological value are not evidenced, it over values the grassland habitat, its assessment of naturalness is inaccurate, and it over scores species rarity. We contend that the site’s value is lower than that stated in the Assessment and accordingly would not meet the criteria for it being made a SINC.

Notwithstanding the above, it remains the case that the site is in a highly accessible location, adjacent to a high frequency bus route and soon the A34 SPRINT route. It is located within the urban fringe of Great Barr, it is immediately surrounded by development to the north east, east and south, which encloses the site to a degree. Given the surrounding environment future proposals for the site are capable of linking into the wider green infrastructure network for the area and deliver a net gain in biodiversity and real public benefits, including opening parts of the site up as public open space.

We therefore intend to prepare a more detailed, green infrastructure led masterplan to reflect the site's characteristics, which we will share and discuss with the Council in due course.

Please do not hesitate to contact me should you wish to discuss this letter further.

Yours sincerely



Tom Armfield
Director

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Appendix 6: Vision Document (October 2021)



HIMOR

Land off Birmingham Road, Great Barr VISION DOCUMENT

October 2021



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1. THE VISION

Land off Birmingham Road, Great Barr provides a great location for sustainable high-quality development that includes new housing and extensive green infrastructure, providing a first class resource for new and existing residents. An ecologically diverse space can be created and opened up to public access, enhancing biodiversity and providing local healthy opportunities for outdoor recreation.

VISION

The site is approximately 27ha in size and up to 8.68 Ha are proposed for new housing, with potential space for a park and ride, healthcare provision, and the remaining parts of the site for green uses.

The site can;

- Meet evidenced housing needs.
- Become a Country Park destination along an enhanced Beacon Way long distance route.
- Protect and enhance the ecological interest on the site.
- Provide a balance between built form and green infrastructure.
- Provide linkages to wider green spaces.
- Create and improve links between existing community assets including the Q3 Academy.
- Make use of natural topographic characteristics to shape and enhance local views.
- Provide healthcare for existing and new residents.
- Accommodate development whilst securing measurable net gains in biodiversity

The location of the site means that it has immediate access to strong, sustainable, and growing infrastructure. Whilst the site is currently in the Green Belt, consideration should be given to the value of this, balanced against the opportunity for sustainable development that delivers new enhanced and accessible green infrastructure.

This site presents an opportunity to balance high quality new housing with diverse greenspace, respecting the wider setting and integrating and enhancing existing features.



HIMOR

HIMOR has an extensive track record of delivering high quality development, this is built on strong relationships with all stakeholders, including the local planning authority and the local community.

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

2. SITE & CONTEXT

The site is an area of low grade agricultural land, to the north and west of Great Barr, and is currently located within the Birmingham Green Belt. Largely under grassland, and formerly used for grazing, some field compartments are used as pony paddocks.

THE SITE

The field compartments are generally irregular in shape and comprise outgrown hedges with some hedgerow trees. There is no woodland on site, though some blocks of trees lie immediately to the north within the grounds of the Aston University sports facilities.

Land north of the site comprises Aston University sports facilities and some areas of scrub and woodland accessed from the A34. There are also a range of buildings and built sports facilities, and the area has a very managed character.

Land east and south of the site comprises 20th century residential development, with mainly semi-detached and short terraced properties, mostly with sizable gardens. Properties on Peak House Road back onto the site and properties on the southern side of Wilderness Lane, front onto the site.

The Q3 Academy, with a range of academic buildings and sports facilities/ external space lies immediately to the south.



View from within the site facing properties on Wilderness Lane



View from within the site facing north west towards Yew Tree West Bromwich

2. SITE & CONTEXT

EXISTING LAND USE

Existing land uses in the vicinity of the site are a complex mix of pockets of farmland (or former farmland), built up areas, sports facilities, golf courses woodland and water. The site forms part of an area of farmland, surrounded by built development or sports facilities. The area links with woodland to the north beyond the A34.

The M6 motorway passes through the area east-west with the A34 providing access to the site and connections further north to Walsall.

Figure 1: Site Context Plan

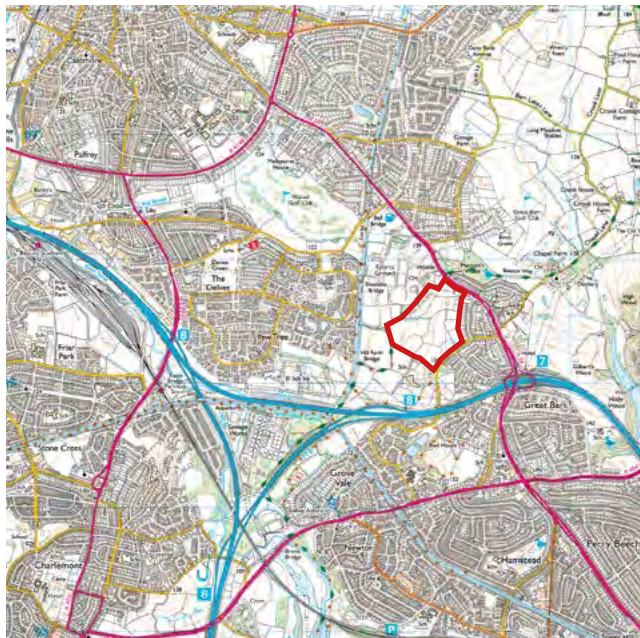
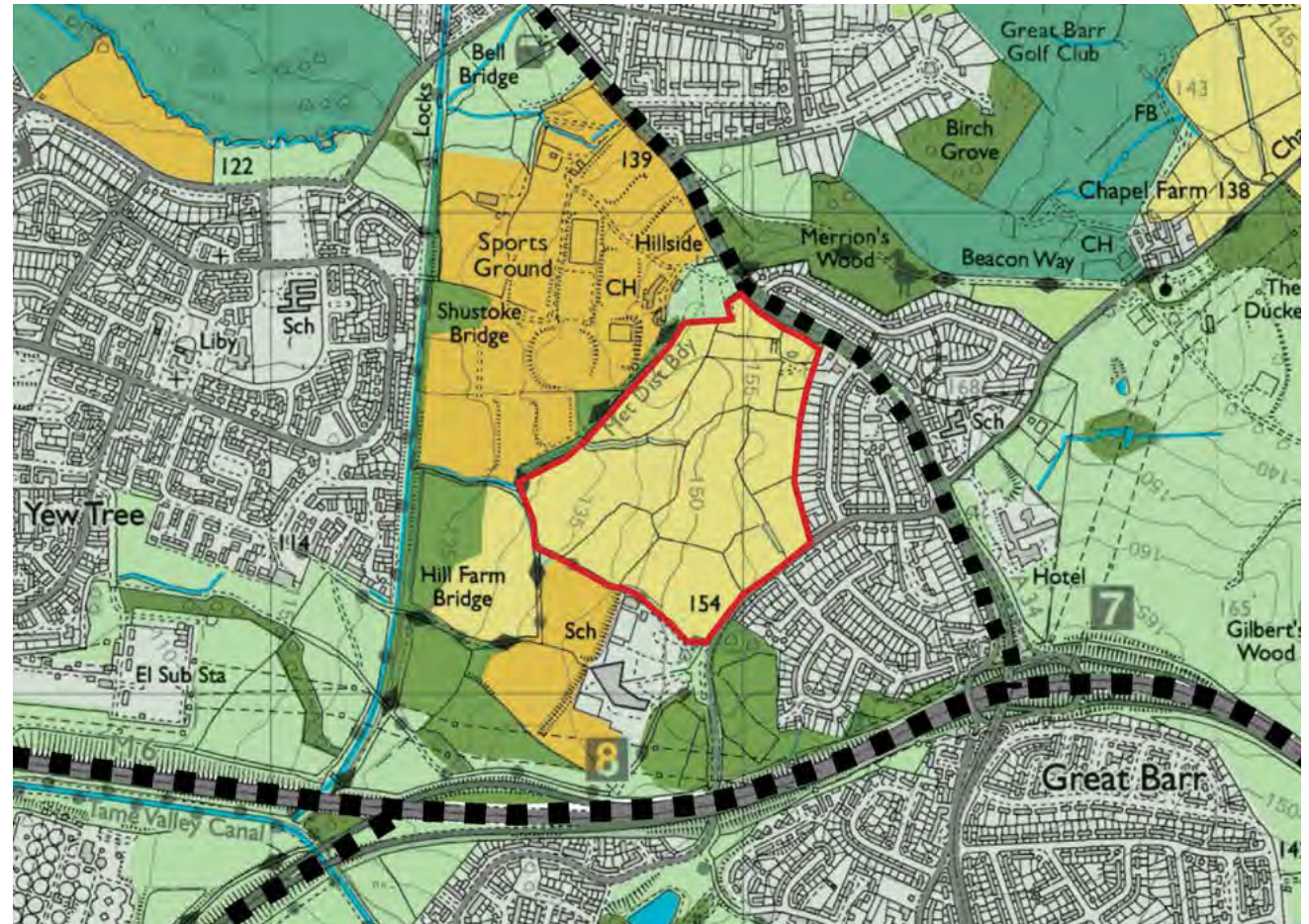


Figure 2: Land Use Plan



2. SITE & CONTEXT

MOVEMENT AND INFRASTRUCTURE

The site has excellent connections, with access to the strategic highway network, significant local routes and regular bus services. There are good opportunities for cycling and walking with routes immediately adjacent to the site. The Q3 Academy is adjacent to the site providing high quality secondary and 6th Form education, and three primary schools are also close by. Great Barr local centre with a wide range of facilities lies less than 1.5km to the south and there are a number of shops and restaurants/pubs within close walking distance on Birmingham Road.

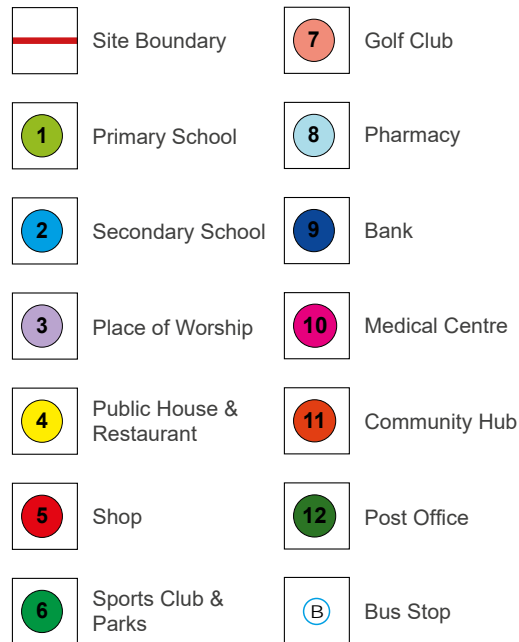


Figure 3: Facilities Plan

2. SITE & CONTEXT

TOPOGRAPHY

The highest ground in the area exists near the M6/A34 Junction at Great Barr. The motorway is in cutting here. The land at this point reaches 165m AOD. Land descends to the east to form a valley near Holly Wood Nature Reserve, reaching approximately 135m AOD in the valley bottom.

Land also descends to the east being typically 110m AOD at Yew Tree. The site forms part of this west facing slope. The site generally descends from approximately 165m in the north east corner, to 130m in the west. A localised valley runs from the south west to north east within the site.

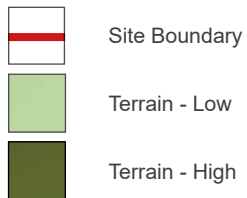


Figure 4: Topography Plan

2. SITE & CONTEXT

PUBLIC RIGHTS OF WAY

There are no Public Rights of Way (PROW) within the site, and unusually for a site within the urban area, there is currently little evidence on the ground of informal recreational use.

The Beacon Way long distance path extends along the edge of the sports fields, immediately north of the site. This path is not obvious to follow from the A34, and in parts follows a narrow corridor between planting and a boundary fence, making an unattractive and slightly intimidating route. The route does appear to be used, but not extensively. The path is part of the overall Beacon Way 18 mile route. The other PROW in the area is the footpath which extends west from Wilderness Lane, immediately north of the Q3 academy. This appears to be a better used route, but again is quite narrow and unwelcoming in places.







Figure 5: Public Rights of Way

DESIGNATIONS

The site is not covered by any designation relating to its landscape character or quality. The site lies within the Green Belt. Designated areas of landscape occur in the vicinity of the site, including the registered park and garden at Great Barr Hall. There is no intervisibility between the site and this park, though Merrions Wood north of the A34 is included in this designated area. The wood is also a Local Nature Reserve and the Beacon Way path passes through it. The opportunity exists to establish a green infrastructure link, between this area and the site, with the potential for a rerouted Beacon Way.



Figure 6: Designations Plan

	Site Boundary
	Green Belt
	Local Nature Reserve: Merrion's Wood
	Registered Park and Garden: Great Barr Hall, Grade II

2. SITE & CONTEXT

VISUAL ANALYSIS

A visual analysis has been completed and this shows that the site can be seen from a variety of locations within the urban context with some views out from the site towards West Bromwich. The properties around the south and east of the site have some views in and exert an influence on character. The higher parts of the site to the south and east allow distant views out over the wider urban area. The lower lying land within the site to the north and west has more limited visibility in and out.

The site is visible from the adjacent roads, including Wilderness Lane and limited views from the A34. Some longer views are possible from the urban area to the north and west, such as from Thorncroft Way. In these views the higher part of the site is visible against the backdrop of existing properties off Wilderness Lane, with the lower land screened by planting. Views are also likely to be possible from the various tower blocks in the wider area. Overall, however there are relatively few public views to the site from the wider area. Across most of the area, local influences such as nearby buildings, visually limit distant views.



Figure 7: Viewpoint locations plan



Viewpoint A: View from within the site facing west towards West Bromwich



Viewpoint B: View from within the centre of the site facing north east



Viewpoint C: View from Thorncroft Way, within the area of Yew Tree, West Bromwich

2. SITE & CONTEXT

This landscape has been explored in the Black Country Landscape Sensitivity Assessment carried out by LUC in September 2019. The site forms part of area BL25 in the study. This area also includes a significant area of land to the south extending as far as Red House south of the M6.

LANDSCAPE SENSITIVITY

The site forms part of a parcel towards the middle of the landscape sensitivity ratings for the Borough.

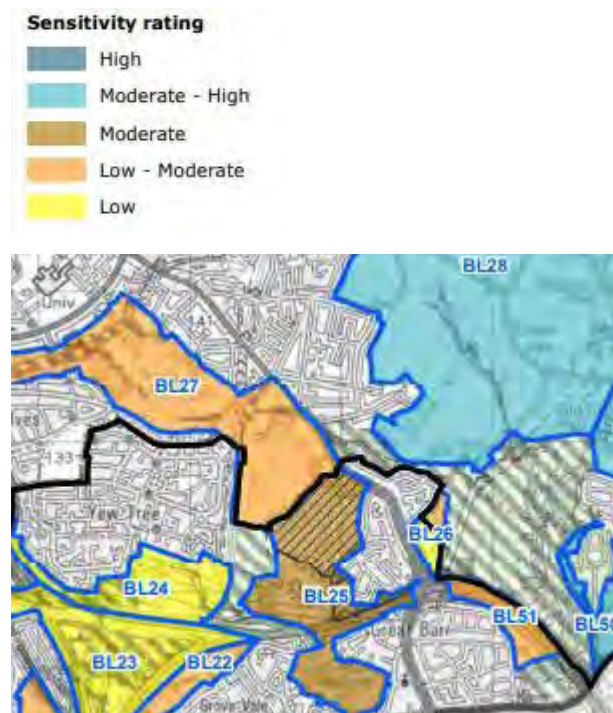


Figure 8: Extract from Figure 4.8 of the Black Country Landscape Sensitivity Study (2019)

Built character is identified as characteristic leading to lower sensitivity with specific mention of the Q3 Academy. In terms of recreational character, the Beacon Way is noted. The area's rural perceptual qualities are noted to be adversely affected by significant road noise from the M6 and the A34.

The area is shown to have a higher sensitivity in relation to 'Landscape pattern and time depth' and 'scale' and a moderate rating for settlement setting which states that the area provides some rural visual setting for parts of Great Barr.

Overall the area is given a "Moderate" sensitivity rating, with the accompanying text stating;

"The landscape area has a moderate landscape sensitivity rating to residential development as it retains many rural qualities, including historic field patterns, ecological value due to the extent of priority habitats and an intact network of mature hedgerows."

With sensitive development, the scheme could work with the field pattern and retained hedgerows. With new green infrastructure and introduction of new habitats positive enhancements for biodiversity could be made.



Existing landscape features to be retained



Existing landscape features to be retained

2. SITE & CONTEXT

Ecological surveys have been carried out on the site, and no overriding ecological constraints have been identified. The main ecological interest on site lies in some areas of grassland and field boundary hedgerows, where possible these ecological features would be retained as part of the green infrastructure.

ECOLOGY

The main ecological interest on the site lies in the hedgerow network, much of which would qualify as “important” under the hedgerow regulations. These would largely be retained and form a framework for development and green infrastructure

Localised areas of grassland are also of heightened interest, with pockets of the this likely to qualify as priority habitat. However, the majority of grassland is of low ecological interest. The most valuable areas of grassland are proposed to be retained, whilst significant areas can be enhanced or created.

Overall the strategy for ecology within the site would comprise;

- **Improvements the floristic diversity of the retained grassland within the site through wildflower grassland seeding / scarification and future sensitive management;**
- **Improved opportunities for roosting bat within the site through new bat bricks and bat boxes being provided;**
- **Improved bird nesting opportunities for a variety of bird species through provision of bird bricks / boxes and creation of new areas of native structural**

- **planting;**
- **Creation of ecology zones with a diverse mosaic of floristically rich habitats types shall provide gains over the current situation;**
- **Creation of a number of new ponds to offer a range of species with heightened on-site opportunities; and**
- **Improved and strengthened local green infrastructure through habitat creation and future sensitive management.**
- **Secure significant net gains for biodiversity as measured through a Biodiversity Metric**



3. CONSTRAINTS & OPPORTUNITIES

The detailed site analysis leads to a number of constraints and opportunities for change. The site itself is an area of largely unused agricultural land, with field parcels bounded by outgrown hedges, with some hedgerow trees.

CONSTRAINTS AND OPPORTUNITIES

Some of the hedges are “important” under the hedgerow regulations and have some ecological value. The field pattern is largely sinuous and appears to have some historic interest. The flatter areas of land are located to the east and south towards the existing housing. The steeper slopes pass across the central parts of the site, with the steepest section of all to the north adjacent to the sports ground.

Views into the site are possible from Wilderness Lane, through the field gate or over the boundary hedge. More distant views from the wider city to the west are also possible seen in context to existing properties, though close-range views from the Beacon Way path are more restricted by localised vegetation.

The moat feature near Wilderness Lane is an interesting feature of some ecological and historic interest which will be preserved and enhanced.

Access would be possible from the A34 and from Wilderness Lane. There would be the potential for a park and ride with a bus route through the site as part of the Sprint Cross-City Route.

Opportunities arise from the introduction of built development and establishing new areas of accessible green space.

There is the opportunity to tie into the Beacon Way Long distance route and to provide an alternative much more attractive and safe feeling route.

The former agricultural character of the site, with its sinuous hedgerows could provide a basis for a new ecologically more diverse and accessible landscape. If it is no longer viable to graze this urban edge area of land, a positive new use based on ecological principles would benefit the area.

Opportunities to provide healthcare within the site to benefit new and existing residents.

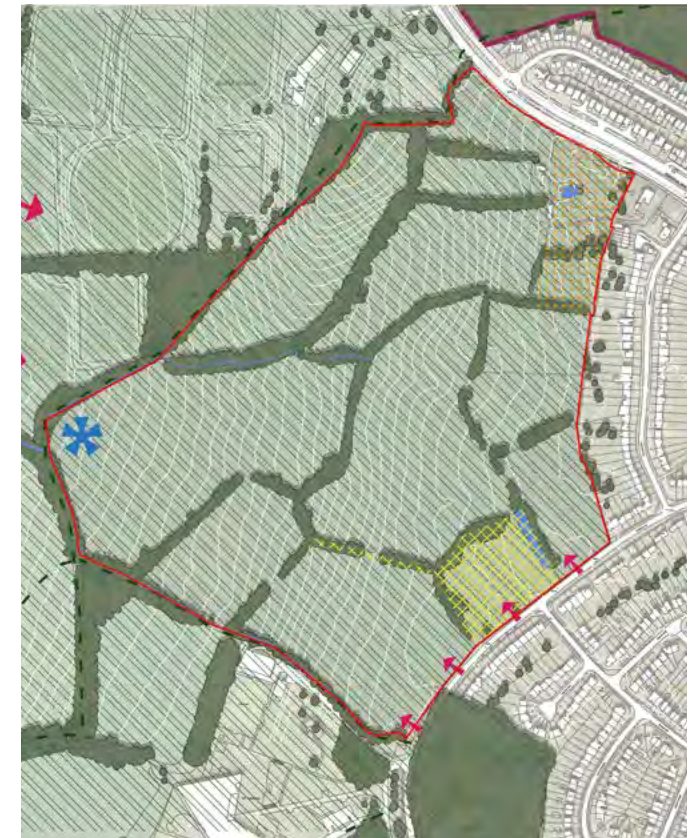
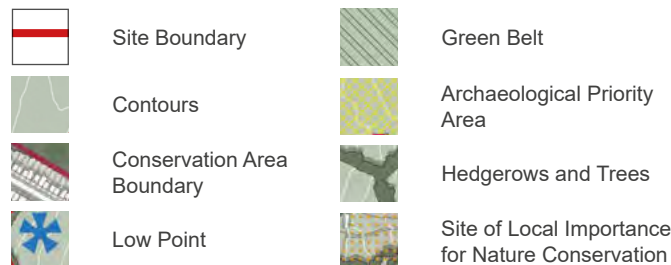


Figure 9: Constraints and Opportunities

4. CONCEPT DEVELOPMENT OPTIONS

The Vision is expressed through two emerging options for Capacity Plans, which following analysis of the known baseline conditions and constraints, illustrate the potential layout and scale of land uses together with the approach to green infrastructure. These are not fully developed masterplans at this stage, but concept plans to show the potential approach to developing parts of the site.

OPTION 1

Option 1 shows a limited area of new built development off Wilderness Lane, between Peak House Road and the Q3 Academy. The new housing would be developed in parcels contained by a structure of the retained hedgerows and trees. The moat feature and adjacent field would be retained as an area of green infrastructure. The northern part of the site would remain open and undeveloped with the part to the north remaining in agricultural management, and the western part becoming an ecologically based Country Park. The Beacon Way long distance path could be re routed through the site, providing a much more inviting and attractive route than the current constrained and intimidating alignment. This option follows the existing urban form and retains a large open area to the north.

The option shows 7.2ha of new housing, which would deliver approximately 250 new dwellings at 35dph or 288 dwellings at 40dph. This would represent approximately 27% of the site area. Potential healthcare provision proposed encompassing 0.27ha of land. A substantial proportion of the site would be green infrastructure capable of delivering biodiversity net gain for the development.



Figure 10: Development Option 1

4. CONCEPT DEVELOPMENT OPTIONS

OPTION 2

This option provides a larger area of development across the eastern and southern part of the site. The option includes the land shown on Option 1, but also includes the land on the more northerly fields and allows a route through the site between Wilderness Lane and the A34. A logical form of development could be achieved, with different points of access to Wilderness Lane and Birmingham Road for pedestrians and cyclists. A bus route could extend through the site, and a potential park and ride and bus interchange could be provided, close to the A34. The field containing the moat has been kept as part of the green infrastructure, and a range of green links could be based around the retained field structure.

This option could provide up to 8.68ha of development and up to 300 dwellings at 35dph or 345 dwellings at 40dph. A potential park and ride and bus interchange is proposed on 1.35ha of land with 0.27ha for potential healthcare. The option also shows an extensive area of green infrastructure and a Country Park, with the re - routed Beacon Way long distance path.

This option has the following implications:

- **Benefits to sustainable travel, through the provision of the potential park and ride facility.**
- **It allows for a logical urban form and maintains an area of open land to the north adjacent to the sports pitches.**
- **The majority of the historic hedgerow pattern stays intact, with minor losses of sections to provide connections between parcels.**

- **Additional planting within the green infrastructure will mitigate for any minor loss in existing vegetation.**
- **Green infrastructure capable of delivering biodiversity net gain for the development**

- **There is an excellent opportunity for habitat enhancement and increased public access on the land to the north and west, and through the development.**



Figure 11: Development Option 2

5. GREEN INFRASTRUCTURE

A substantial proportion of the site would be retained or established as green infrastructure, with potentially some land retained in agricultural use, or all developed as a Country Park.

GREEN INFRASTRUCTURE

There is currently no public access into the site, however with some new development a significant new area of accessible greenspace would be available.

This could become an attractive local destination along the Beacon Way, providing public access into the site with space for sustainable outdoor recreation, close to where many people live in an established urban area. The park would be developed along ecological principles with retained and enhanced habitats based around the framework of retained hedges. Areas of existing interest, including some grassland, would be retained, and other areas enhanced, with potential to create more diverse meadows, new tree and woodland planting, fruiting trees for birds and enhanced habitat for bats. New routes through the area could be established linking to existing residential areas and rights of way. Within the overall area, facilities for children's play could be established.

The green infrastructure would include:

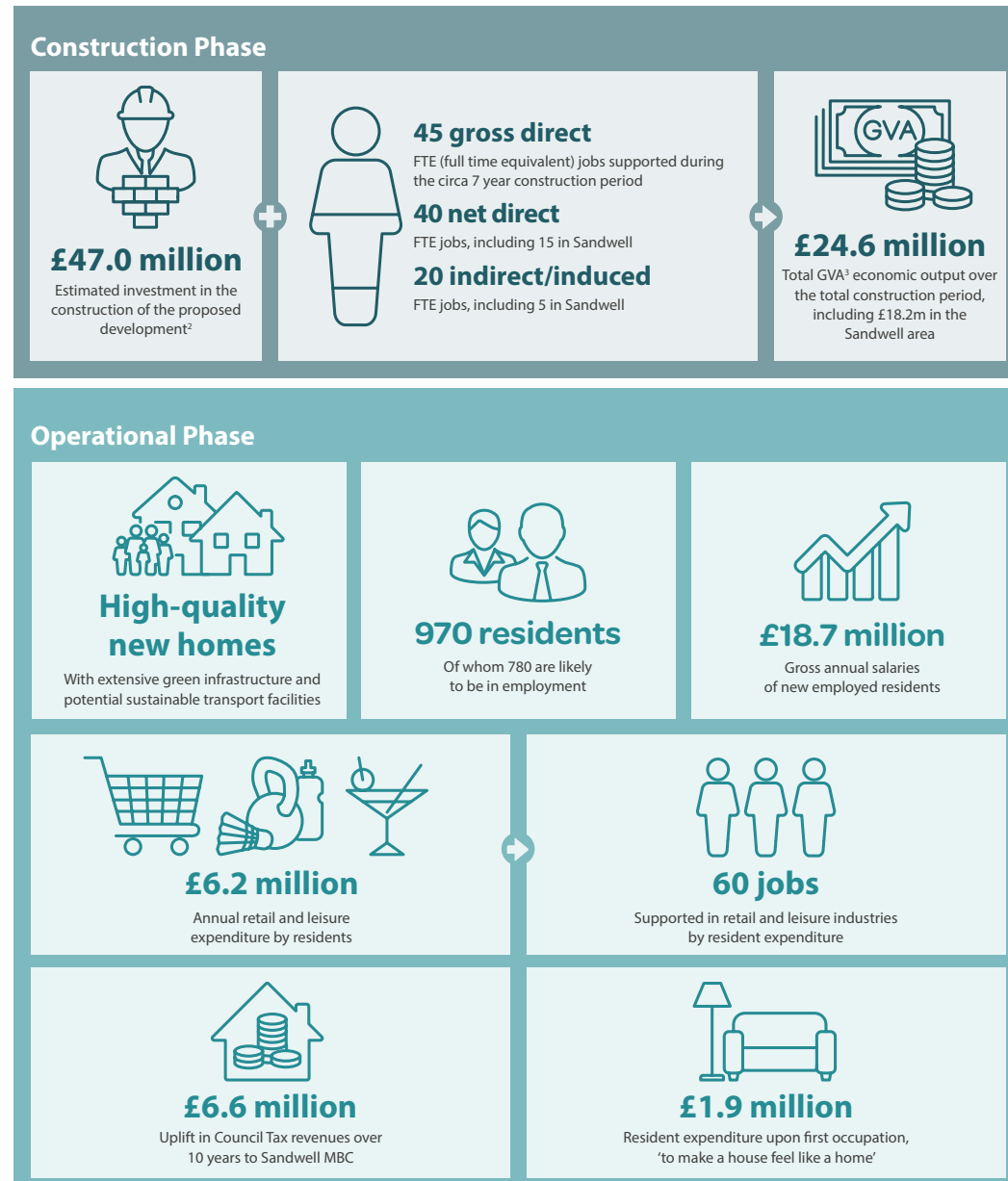
- **Retained trees and hedgerows with reinforcement planting where necessary.**
- **New recreational walking and cycling routes integrated within green corridors, including a re-routed Beacon Way.**

- **Equipped children's play integrated with the new housing.**
- **A fitness trail for outdoor exercise.**
- **Improved floristic diversity of the retained grassland through wildflower grassland seeding / scarification and future sensitive management.**
- **Improved opportunities for roosting bat through new bat bricks and bat boxes being provided.**
- **Improved bird nesting opportunities for a variety of bird species through provision of bird bricks / boxes and creation of new areas of native structural planting.**
- **A diverse mosaic of floristically rich habitats types.**
- **New ponds and wetland areas.**
- **Secure a wildlife corridor in the long-term, contributing to long-term ecological resilience.**



7. ECONOMIC BENEFITS

An indicative scheme of up to 345 homes would generate a range of economic benefits, summarised below.



1 This infographic is based on a build out rate of 50 dwellings per annum, the RICS Build Cost Information Service (BCIS) to assess build costs, and excludes any benefits that may arise from the potential park and ride interchange facility

2 The total construction investment includes infrastructure costs and professional fees

3 GVA (Gross Value Added) measure the value of output created (i.e. turnover) net of inputs used to produce a good or service (i.e. production of outputs). It provides a key measure of economic productivity. Put simply the GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes.

8. CONCLUSION

CONCLUSION

The Vision demonstrates how the site is very well located for a wide range of infrastructure and facilities. Whilst the site contains some features of interest mainly the existing hedges and trees, it is inaccessible and of little use or value to the nearby population. The site lies within the Green Belt, but by removing a limited part of the site from the Green Belt for residential development, an extensive area of land could be made available for green infrastructure for the benefits of the existing and new population. This would enhance the value of the site for nature conservation, and provide space for outdoor healthy recreation, close to where people live. A new Country Park could become a local destination along an enhanced Beacon Way long distance path.

Two options have been shown, the first having a limited area of new housing including potential healthcare provision served off Wilderness Lane, with an extensive area of retained farmland and Country Park. A second concept option shows slightly more housing, and space for a park and ride facility, with a sustainable transport connection between Wilderness Lane and the A34. Whilst slightly more land would need to be removed from the Green Belt, this option has additional benefits for sustainable travel within the wider conurbation.



Residential development and wetland habitat



Footpath connections through green infrastructure



Residential housing

Great Barr

VISION DOCUMENT

**Appendix 7: Technical Review of Housing Need
and Supply in the Black County
(October 2021)**

Technical Review of Housing Need and Supply in the Draft Black Country Plan 2039

October 2021

Turley

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Executive summary

1. Turley has been commissioned by a consortium of developers to critically review the approach to housing provision that is proposed in the Draft Black Country Plan 2039 ('the Draft BCP') which was published in August 2021 and is currently out for consultation until 11 October 2021.

Housing need

2. The Draft BCP acknowledges an overall need for 76,076 homes throughout the Black Country over the plan period (2020-39). This equates to an average of **4,004 dwellings per annum**, aligning closely but not exactly with the minimum need for 4,011 dwellings per annum currently suggested by the standard method.
3. This would actually only require the existing housing stock to grow at an average rate of 0.7% per annum which is less than is needed either regionally or nationally, according to the standard method (0.8/1.1%) and indeed aligns exactly with the average housing growth seen across the West Midlands as a whole since 2006.
4. The outcome of the standard method for the Black Country therefore should not be viewed as excessively high, but instead a reasonable benchmark of the *minimum* need for housing in this area. It would boost the historic rate of delivery, in line with the Government's ambitions, and allow Wolverhampton – as one of the country's largest cities – to contribute towards meeting a nationwide need for housing.
5. There may well be an even greater need for housing given that the standard method makes no attempt to predict the impact of changing economic circumstances, for example, and the Councils' existing evidence base does not properly consider whether there will be sufficient labour to meet the economic growth ambitions of the sub-region. It equally provides no assurance at present that the prevailing need for houses, estimated to account for two thirds of the overall housing need in the Black Country, can and will be met through the proposed supply.

Housing supply and shortfall

6. The Draft BCP intends to make provision for only 47,837 homes over the plan period, equivalent to **2,517 dwellings per annum**, leaving a shortfall of circa 28,239 homes to 2039 with an assumption – but no guarantee – that this will be met in neighbouring areas. The proposed level of annual provision has been exceeded in each of the last six years, when roughly a third more homes have been delivered. The Black Country has seen tangible benefits as a result, more effectively attracting and retaining people than has been the case historically and once again growing its working age population.
7. Rather than planning positively for a similar "boosting" that would very nearly meet the minimum need for housing suggested by the standard method, the Draft BCP instead threatens to reduce the recent rate of delivery by 12%. Demographic modelling suggests that this would dramatically slow the recent rate of population growth and effectively force around 5,500 residents to move elsewhere every year, over three times more than in recent years.

8. The associated reduction in the size of the working age population, combined with potential behavioural changes, would be expected to leave a labour force capable of supporting only 615 new jobs every year, whereas at least one economic forecast suggests that the Black Country has the potential to create over three times as many jobs (c.2,100 per annum) and indeed the LEP has previously expressed a target that appears to be over ten times greater, at in excess of 6,000 jobs per annum.
9. This demographic modelling could even be reasonably described as optimistic as it assumes that the proposed requirement can be met through the supply identified in the Draft BCP, which may not be the case based on the analysis in this report. The National Planning Policy Framework (NPPF) requires Local Plans to be aspirational but deliverable, identifying a sufficient supply of sites taking into account their availability, suitability and likely economic viability. Those sites should meet the tests of deliverable and developable contained in the NPPF glossary. This report assesses the Councils' claimed supply against the NPPF guidance and **concludes that 9,571 homes** are unlikely to be deliverable/developable during the plan period. This has a significant impact because it would result in **the shortfall increasing to 37,810 homes, circa 50% of the minimum need for housing.**
10. Given the large gap between supply and need, compounded by previously over optimistic assumptions on what can be delivered, the Councils' sources must be scrutinised further as the BCP advances, and the implications of the possible additional housing supply shortfalls considered closely.
11. This report follows on from Turley's 'Falling Short – Taking stock of unmet needs across the Greater Birmingham and Black Country Housing Market Area' published in August 2021. That report identifies a housing shortfall across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) of between circa 18,700 and 42,000 dwellings up to 2031, and between 68,700 and 78,000 homes up to 2040. This includes the Black Country shortfall as currently reported in the Draft BCP. Any reduction to the Councils' proposed supply would only exacerbate and worsen the wider GBBCHMA shortfall up to 2031 and 2040.

1. Introduction

- 1.1 The Black Country authorities are currently undertaking a Regulation 18 consultation on the Draft Black Country Plan¹ ('the Draft BCP') which runs until 11 October 2021.
- 1.2 Turley has been commissioned by a consortium of developers² to critically review the proposed approach to housing provision, where the Draft BCP acknowledges an overall need for 4,004 dwellings per annum over the plan period (2020-39) – or 76,076 homes in total – but intends to make provision through Policy HOU1 for only 2,518 homes each year, or 47,837 homes in total.
- 1.3 The report is structured to consider:
- The overall need for housing in the Black Country, in **section 2**, reviewing the outcome and limitations of the standard method;
 - The consequences of the approach proposed in the Draft BCP, in **section 3**, where it would slow the recent rate of housing delivery and appears likely to undermine ambitions for economic growth based on demographic modelling that has been commissioned to inform this study;
 - The composition of the proposed housing supply, in **section 4**, and the underlying evidence base;
 - The elements of the proposed supply that are unlikely to be delivered in the period to 2039 and should arguably be removed, in **section 5**, such that supply would fall even further short of need and the aforementioned consequences would be even more pronounced; and
 - The implications of the above analysis for the Draft BCP, in the concluding **section 6**.

¹ Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and the City of Wolverhampton Council (July 2021) Draft Black Country Plan

² Barratt West Midlands and Barratt David Wilson Mercia; HIMOR; Taylor Wimpey Strategic Land; and William Davis

2. Housing need in the Black Country

Establishing the minimum local need

- 2.1 The Draft BCP refers to ‘a local housing need for 76,076 homes’, equivalent to 4,004 dwellings per annum on average over the plan period³ (2020-39).
- 2.2 While not specified, this is assumed to have been calculated using the ‘standard method’ for determining ‘the minimum number of homes needed’, as is required in all but ‘exceptional circumstances’ according to the National Planning Policy Framework⁴ (NPPF). It is of note, however, that the quoted figure does not quite align with the need for 4,019 dwellings per annum calculated, with a 2020 base date, in the recently published Black Country Housing Market Assessment⁵ (BCHMA). It likewise does not align with the current outcome of the formula, when rebasing to the current year (2021) and accounting for the new affordability ratios released in March 2021. It does not even align with the higher figures that were briefly generated earlier this year, when the method was necessarily rebased to 2021 but these updated affordability ratios had yet to be published. While Table 2.1 shows that the difference over the plan period is relatively modest, it is considered that the origin of the local housing need figure must be clarified within the next iteration of the Draft BCP.

Table 2.1: Current and recent outcomes of the standard method

	Outcome of the standard method when applied in		
	December 2020*	January 2021	March 2021
Dudley	636	640	635
Sandwell	1,488	1,487	1,466
Walsall	882	879	869
Wolverhampton	1,013	1,020	1,041
Black Country	4,019	4,026	4,011
Total over plan period	76,361	76,494	76,206
Relative to BCP (76,076)	+285	+418	+130

Source: Turley analysis

* Aligns with BCHMA

- 2.3 There are three elements to the minimum need for housing currently generated for the Black Country authorities by the standard method, as shown by Figure 2.1 overleaf. The demographic baseline of the 2014-based household projections is adjusted by 10-14%, or 11% in aggregate, to formulaically account for the current relationship between house prices and earnings in each area. While none of the four authorities are

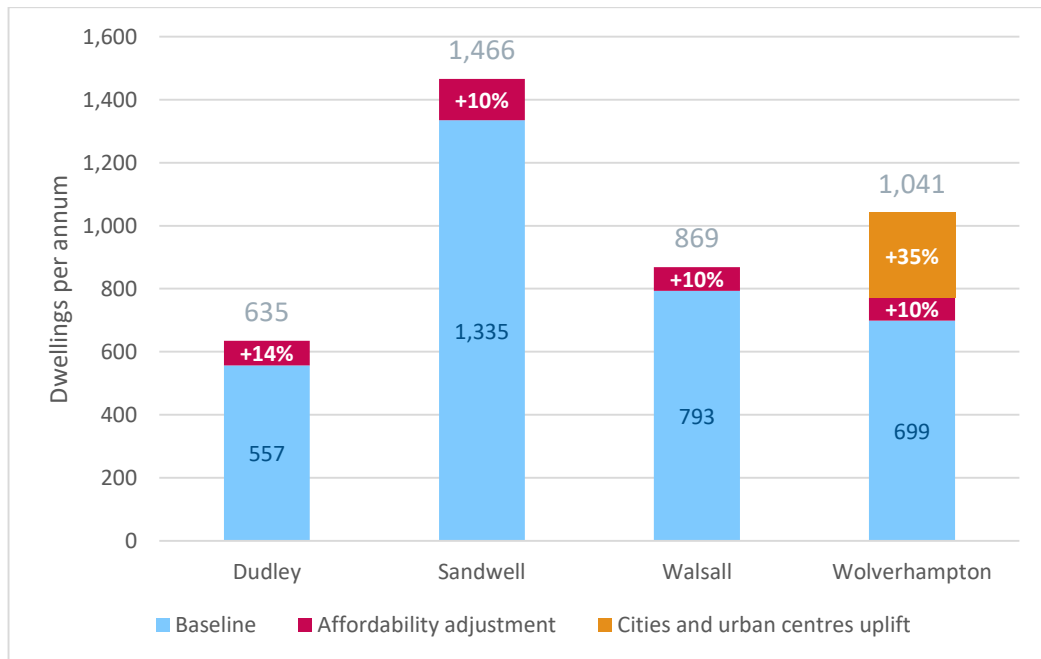
³ Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and the City of Wolverhampton Council (July 2021) Draft Black Country Plan, paragraph 3.20

⁴ MHCLG (July 2021) National Planning Policy Framework, paragraph 61

⁵ HDH Planning and Development (March 2021) The Black Country Housing Market Assessment

affected by the cap linked to existing requirements, Wolverhampton does subsequently receive a further 35% uplift, reflecting its status as one of England’s twenty most populated cities and urban centres which are all required to apply such an uplift in order to ‘*increase home-building in existing urban areas*’ and make a greater contribution towards meeting the Government’s aim of delivering 300,000 homes every year⁶.

Figure 2.1: Components of the standard method for the Black Country



Source: Turley analysis

Setting the minimum need in context

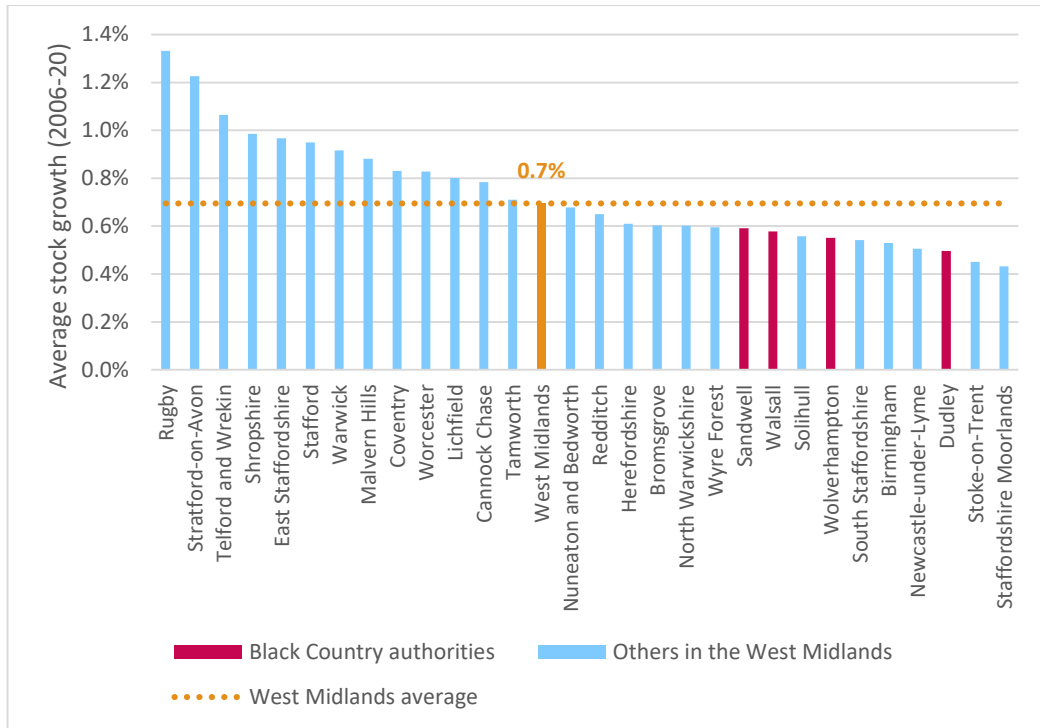
- 2.4 The resultant combined need for at least 4,011 dwellings per annum, like the slightly lower figure of 4,004 dwellings per annum referenced in the Draft BCP, initially appears significant and potentially challenging to meet where the authorities have jointly delivered no more than 3,129 homes in any year since 2006⁷.
- 2.5 It appears markedly less so when considered in context, however. Both figures suggest a need to grow the existing housing stock of the Black Country by an average of 0.7% during each year of the plan period⁸, which is not unrealistic or necessarily unattainable where the West Midlands as a whole has successfully grown its stock at this exact rate on average since 2006. Almost half of its thirty authorities have performed even better, as shown at Figure 2.2 overleaf.

⁶ MHCLG (December 2020) Government response to the local housing need proposals in “Changes to the current planning system”

⁷ Based on completions consistently reported by each authority over the period from 2006 to 2020 in Statements of Housing Supply, Strategic Housing Land Availability Assessments and Housing Delivery Test Action Plans

⁸ MHCLG (2020) Table 125: dwelling stock estimates by local authority district

Figure 2.2: Regional precedents for housing growth needed in the Black Country

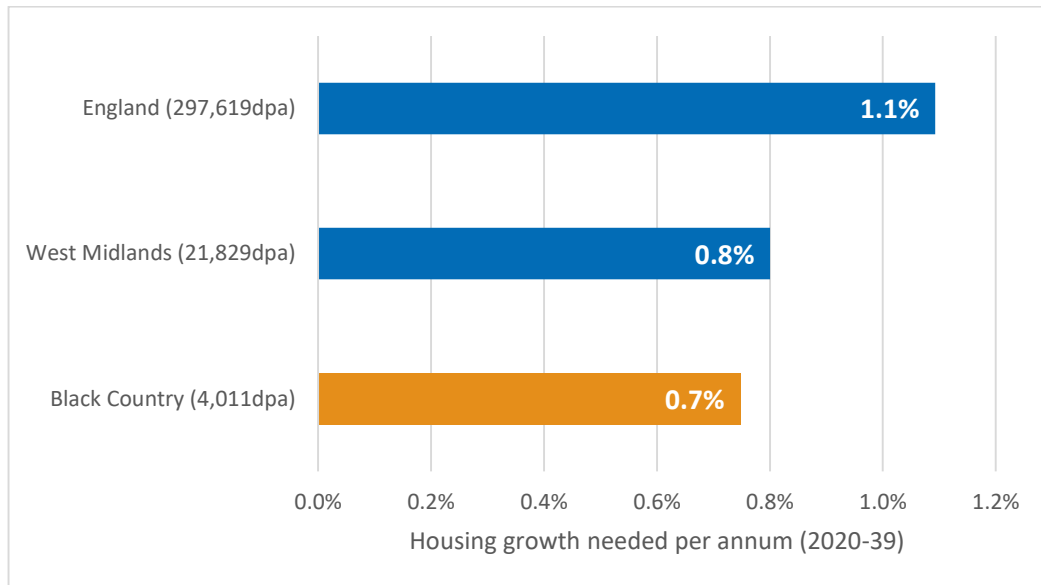


Source: MHCLG; Turley analysis

2.6 The implied need to grow the housing stock of the Black Country by at least 0.7% per annum over the plan period appears still less daunting when acknowledged that the West Midlands needs to grow its housing stock by at least 0.8% per annum over an equivalent period, according to the standard method, and England by 1.1% per annum⁹.

⁹ Based on the outcome of the standard method as of August 2021, estimated for every local authority by Turley and aggregated to the West Midlands (21,829dpa) and England (297,619dpa)

Figure 2.3: Benchmarking the minimum housing need generated by the standard method (2020-39)



Source: MHCLG; Turley analysis

- 2.7 This shows that the outcome of the standard method for the Black Country is not excessively high, rather providing a reasonable benchmark of the minimum need for housing in this area where it would boost the historic rate of delivery – in line with the general aim of the NPPF¹⁰ – and allow Wolverhampton, as one of the country’s largest cities, to make its expected contribution towards a nationwide need for housing.

Prospect of a greater need for housing

- 2.8 There may well be an even *greater* need for housing in the Black Country than implied by the standard method, when recognised that it provides only ‘*a minimum starting point*’ and ‘*does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour*’, such that ‘*there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates*’¹¹.
- 2.9 The BCHMA does not appear to even contemplate such a prospect, only estimating – in a relatively crude way¹² – the ‘*broad economic consequences*’¹³ of meeting the minimum housing need suggested by the standard method without considering whether this would provide sufficient labour to meet economic ambitions, for example. This is contrary to the NPPF, which expects planning policies to ‘*create the*

¹⁰ MHCLG (2021) National Planning Policy Framework, paragraph 60

¹¹ PPG Reference ID 2a-010-20201216

¹² The BCHMA uses “job density” (a measure of jobs per working age person) to estimate the number of jobs in the Black Country at the end of the plan period, drawing on a population projection that is intended to align with the standard method. This is considered to be relatively crude where similar studies tend to draw upon demographic models that allow for future changes in economic participation and unemployment rates, and make transparent assumptions on commuting and so-called “double jobbing”

¹³ HDH Planning and Development (March 2021) The Black Country Housing Market Assessment, p71

conditions in which businesses can invest, expand and adapt’ and ‘seek to address potential barriers to investment, such as inadequate infrastructure, services or housing’¹⁴. This should be rectified in the next iteration of the Draft BCP, through the commissioning of further evidence.

Size and type of housing needed

- 2.10 While this section has focused on the overall number of homes needed in the Black Country, the size and type of housing needed is also an important consideration. The NPPF is clear in stating that the planning system should ensure that ‘a sufficient number **and range** of homes can be provided to meet the needs of present and future generations’, and therefore requires ‘the size, type and tenure of housing needed for different groups in the community’ to be ‘assessed and reflected in planning policies’¹⁵.
- 2.11 The BCHMA rightly, in this context, seeks to estimate the sizes of homes needed in each tenure. This is summarised at Table 2.2 below, with the addition of totals to aid interpretation.

Table 2.2: Size of housing needed by tenure (2020-39)

	1 bed	2 beds	3 beds	4+ beds	Total
Owner occupied	7,526	11,005	12,034	8,924	39,488
Private rented	2,209	2,214	2,018	3,502	9,941
First Homes	1,322	1,724	2,152	1,208	6,407
Shared ownership	1,527	1,953	1,680	943	6,103
Social/affordable rent	2,959	1,715	2,555	4,287	11,516
Total	15,543	18,611	20,439	18,864	73,455
%	21%	25%	28%	26%	100%

Source: HDH Planning and Development; Turley analysis

- 2.12 While this modelling suggests a need for property of all sizes, it indicates that the greatest need is for larger homes with at least three bedrooms, with this accounting for 54% of the overall need for housing in the Black Country.
- 2.13 This profile of need has clear implications for the *type* of housing needed to deliver such a mix, even if this is not explicitly considered by the BCHMA. Houses, rather than flats or bungalows, will undoubtedly be required for instance to meet the need for larger homes with at least three bedrooms, where some 97% of the existing homes of this size in the Black Country are houses¹⁶. Indeed, when combining the above with these statistics from the Valuation Office Agency (VOA) – which show the proportion of one bedroom properties in the Black Country that are flats, for example – it can be argued that two thirds (66%) of the overall need for housing in this area relates to

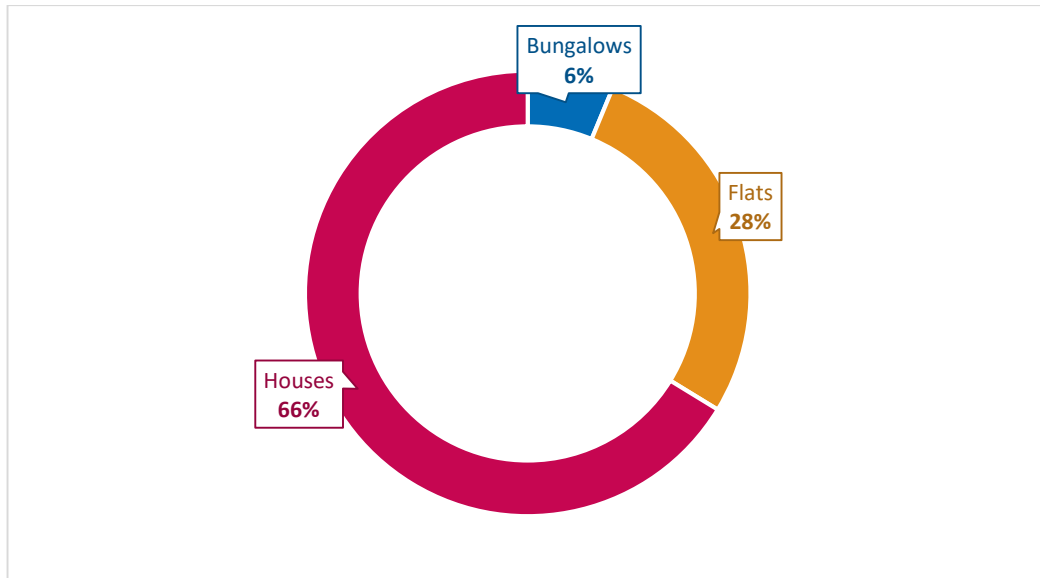
¹⁴ MHCLG (July 2021) National Planning Policy Framework, paragraphs 81 and 82c

¹⁵ *Ibid*, paragraphs 8b and 62

¹⁶ VOA (2020) Council Tax: stock of properties, 2020

houses, with a much smaller need for flats (27%) and bungalows (6%). The Draft BCP should, therefore, identify a supply of sites capable of delivering such a mix, a point considered further in section 4 of this report.

Figure 2.4: Implied need for different types of housing (2020-39)



Source: VOA; Turley analysis

Summary

- 2.14 The Draft BCP acknowledges a **need for 4,004 dwellings per annum** over the plan period. This appears to have been based on the standard method but notably falls slightly below its current and recent outcomes, so must be clarified in the next draft.
- 2.15 While this may initially appear a substantial need that will be challenging to meet – where the authorities have jointly delivered no more than 3,129 homes in any year since 2006 – it is certainly not unrealistic or unattainable when recognised that **it would only need the housing stock to grow at the average rate since achieved by the West Midlands as a whole**, which indeed was bettered by almost half of its thirty authorities. The outcome of the method, as a proportion of the existing housing stock, is also smaller than seen regionally or nationally.
- 2.16 This shows that the outcome of the standard method for the Black Country is not excessively high, but instead **a reasonable benchmark of the minimum need for housing in this area** where it would boost the historic rate of delivery – in line with the general aim of the NPPF – and allow Wolverhampton, as one of the country's largest cities, to contribute towards meeting a nationwide need for housing.
- 2.17 There may well be an even greater need for housing, where **the standard method makes no attempt to predict the impact of changing economic circumstances** for example and the Government accepts that it will often be appropriate to consider whether there is a greater need for housing. The BCHMA does not appear to even contemplate such a prospect, such that there may be insufficient labour to meet

economic growth ambitions in conflict with the NPPF. This must be rectified and properly considered through the commissioning of further evidence.

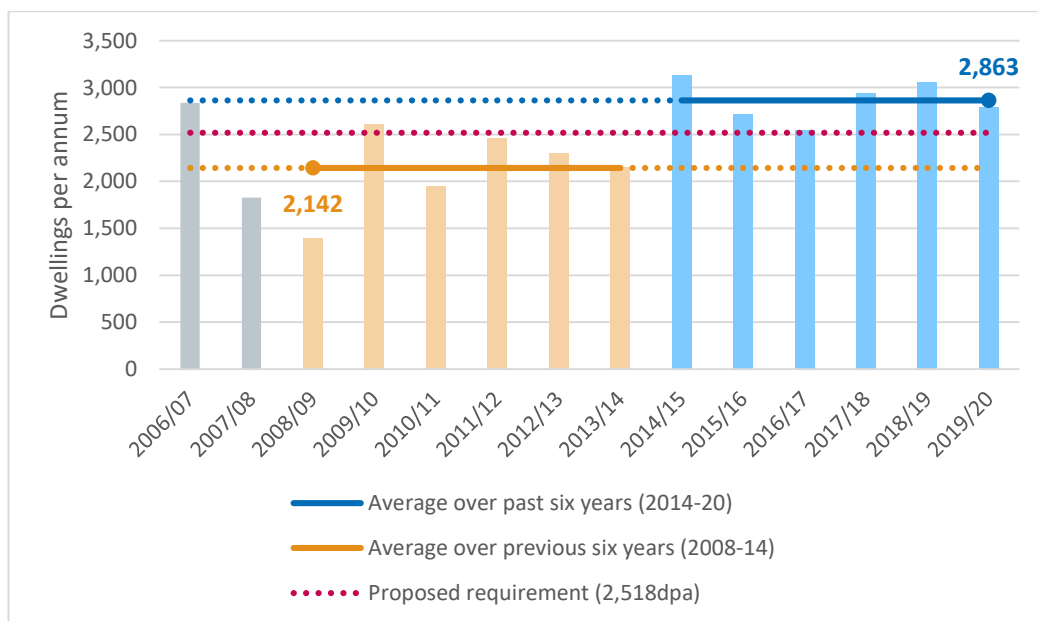
- 2.18 Beyond the overall number of homes needed, the size and type of housing required is also an important consideration for the Draft BCP. Analysis presented in the BCHMA indicates that more than half of all new homes will need to contain at least three bedrooms, and meeting this need will clearly require provision of houses. Indeed, it is estimated that **two thirds (66%) of all new homes over the plan period will need to be houses, rather than flats or bungalows**, with the Draft BCP therefore required to identify an appropriate supply of land that can meet this prevailing need.

3. Consequences of failing to meet need

Planning to reduce the recent rate of housing delivery

- 3.1 The Draft BCP acknowledges a need for 76,076 homes, equivalent to 4,004 dwellings per annum throughout the plan period, but only identifies sufficient land to provide 47,837 homes or 2,518 dwellings per annum¹⁷. It openly admits that this would meet less than two thirds (63%) of the reported housing need, with a presumption – but no guarantee – that neighbouring authorities will accommodate the shortfall¹⁸.
- 3.2 Such an approach, whilst evidently threatening to leave a substantial amount of need unmet, would reverse the progress that has recently been made in boosting housing delivery in the Black Country. Figure 3.1 shows that the proposed requirement for 2,518 dwellings per annum is less than what has been delivered in each of the last six years, the average rate of provision in this period having been boosted by around one third (34%) compared to the six years prior but now apparently at risk of falling by some 12% under the approach proposed by the Draft BCP. This would represent a missed opportunity, as positively planning for a further boosting – of the scale achieved recently (+34%) – would very nearly meet the minimum need suggested by the standard method¹⁹.

Figure 3.1: Proposed housing requirement relative to recent delivery



Source: Councils’ monitoring; Turley analysis

¹⁷ Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and the City of Wolverhampton Council (July 2021) Draft Black Country Plan, paragraph 6.4

¹⁸ *Ibid*, p31

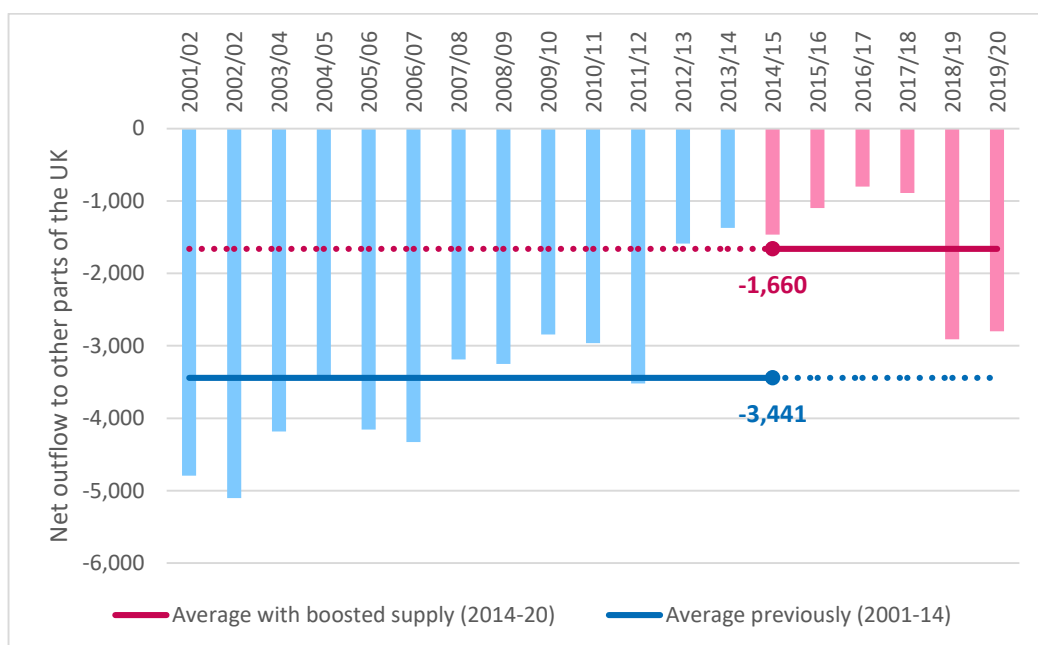
¹⁹ Boosting the rate of provision achieved over the past six years by 34% would result in circa 3,827 dwellings per annum being provided throughout the Black Country, equivalent to almost 96% of the annual need referenced in the Draft BCP

Risking the benefits associated with recently increased provision

3.3 The recent boosting of housing supply has brought demonstrable benefits to the Black Country which will be put at risk if delivery is allowed to fall.

3.4 One such benefit relates to the attraction and retention of people within the Black Country. This area has historically tended to lose residents to other parts of the UK without attracting the same number from elsewhere, but Figure 3.2 shows that the average size of this net annual outflow over the past six years (2014-20) has been less than half that recorded previously, over the years for which consistent data is available²⁰ (2001-14).

Figure 3.2: Recent change in the average net outflow from the Black Country



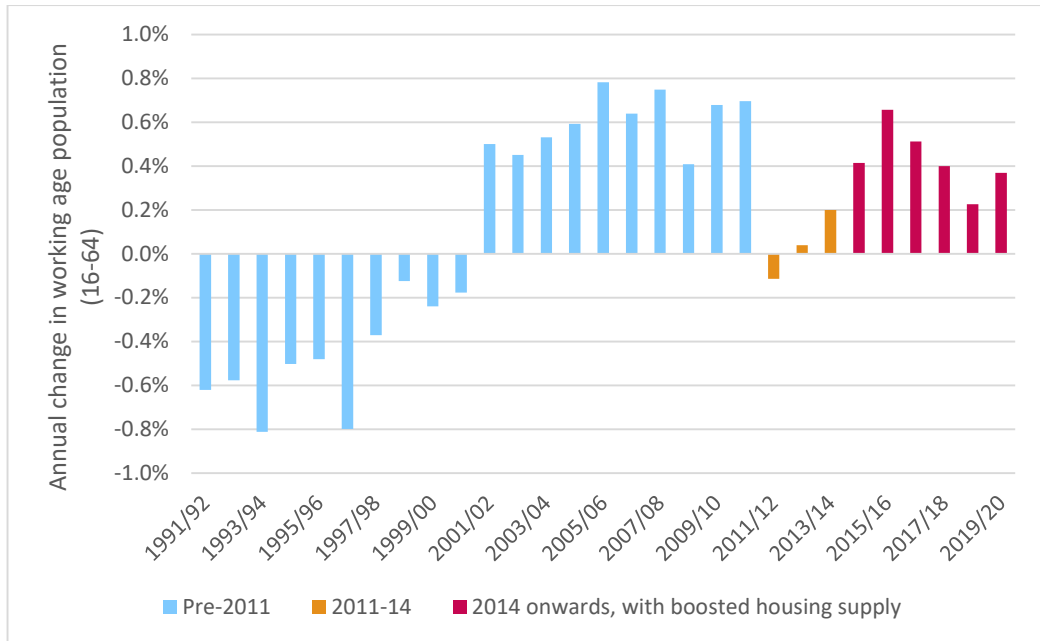
Source: ONS; Turley analysis

3.5 This smaller net outflow of people has helped to restore a trend of growth amongst the working age population (16-64) which had been faltering in the years before²¹. Having declined throughout the 1990s, this cohort grew in size for ten straight years to 2011 before effectively remaining static for three years, with average annual growth of close to zero (0.04%). The boosting of supply from 2014 onwards, however, has helped to once again grow this key cohort of the population as shown at Figure 3.3 overleaf.

²⁰ ONS (2021) Mid-year population estimates, 2001 to 2020

²¹ *Ibid*

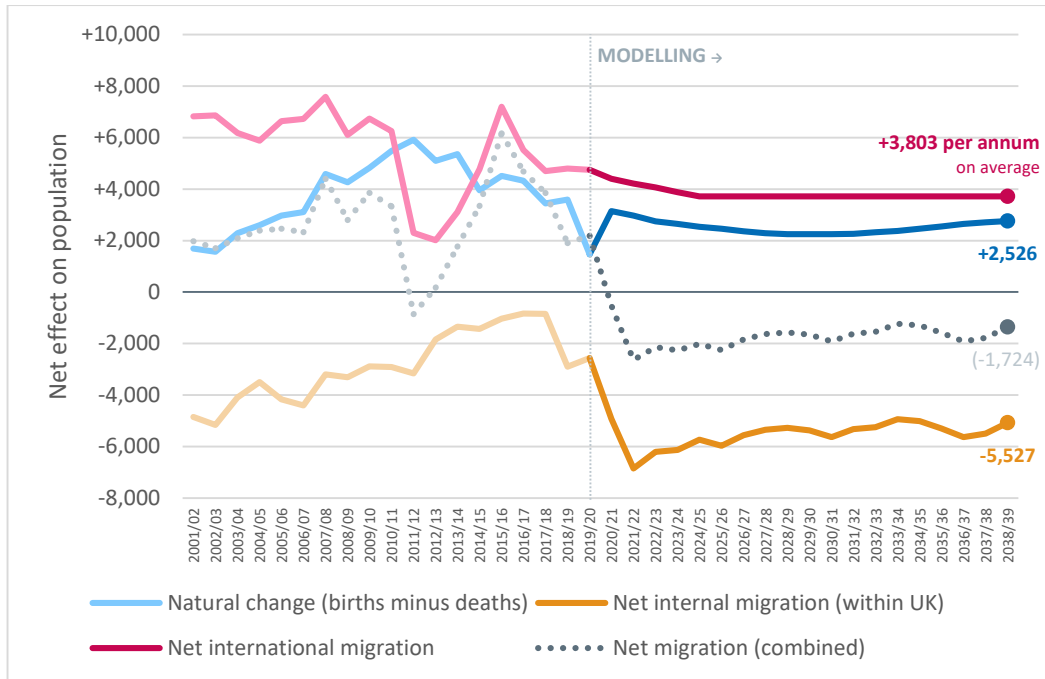
Figure 3.3: Annual change in the working age population of the Black Country



Source: ONS; Turley analysis

- 3.6 The positive trends outlined above appear extremely unlikely to continue if the rate of housing delivery slows to the rate proposed by the Draft BCP, according to demographic modelling by Edge Analytics which has been commissioned to inform this report. This is intended to illustrate how the provision of 2,518 dwellings per annum from 2020 onwards could, in combination with other demographic factors, affect the size and profile of the Black Country population. Further detail on the methodology is provided at **Appendix 1**.
- 3.7 The model suggests that the proposed level of housing provision would be unable to accommodate a net inflow of people from outside of the Black Country, effectively forcing circa 5,525 residents every year to move to other parts of the UK. This is more than three times greater than the net outflow of recent years, shown at the earlier Figure 3.2, and indeed is without recent precedent where it is larger than recorded in any year since at least 2001. This does technically allow for a net inflow of international migrants, albeit one that is smaller than recorded in recent years, but even if this does not materialise and their homes accommodate those otherwise assumed within the model to move elsewhere, the overall net outflow – shown as a dotted grey line at Figure 3.4 below – would remain larger than seen historically.

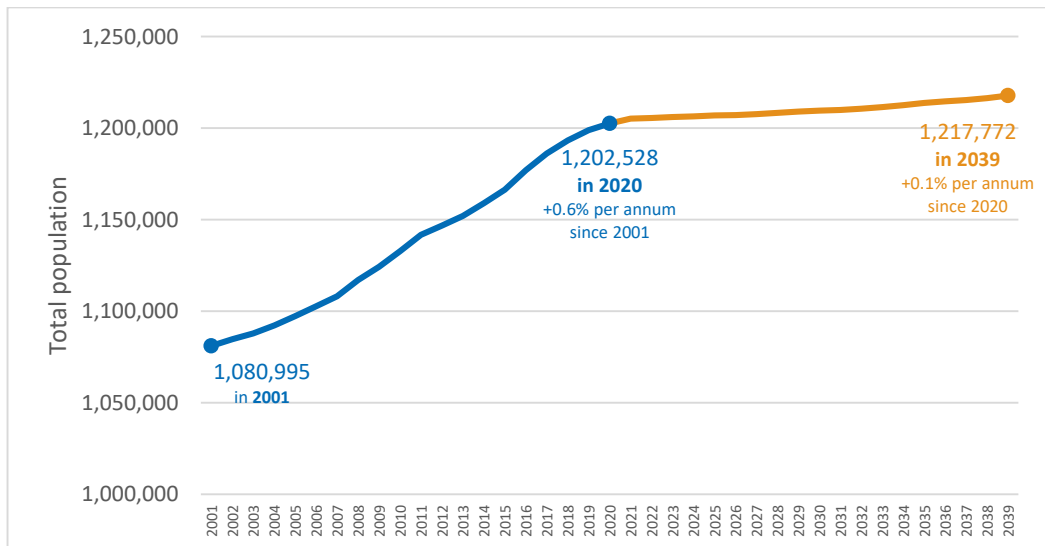
Figure 3.4: Modelled impact of reduced housing provision on net migration



Source: Edge Analytics; Turley analysis

- 3.8 Population growth would be expected to dramatically slow in this scenario, falling to only 0.1% per annum over the 19-year plan period compared to 0.6% per annum over the equally long historic period (2001-20).

Figure 3.5: Modelled impact of reduced housing provision on total population

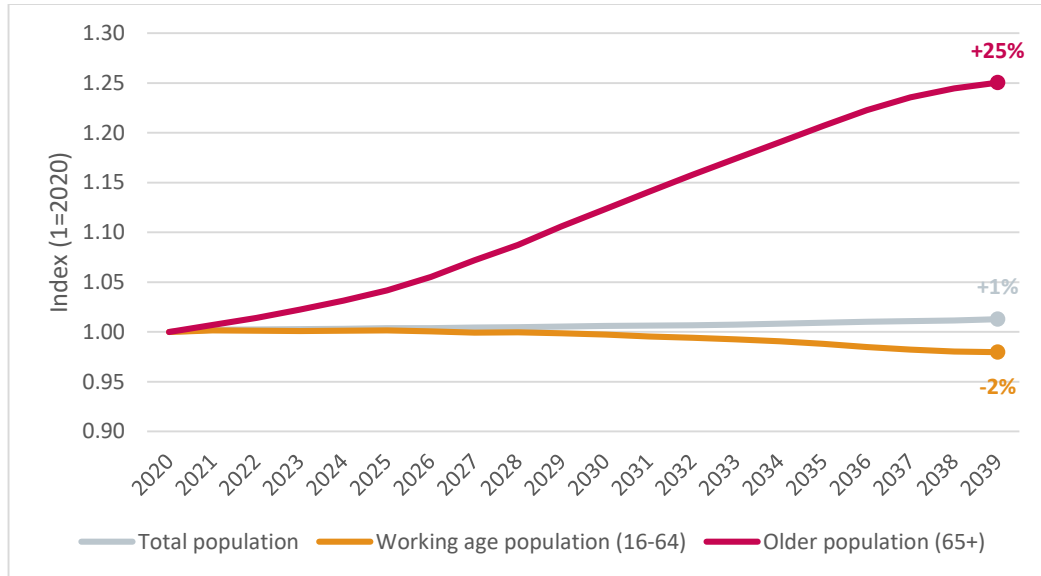


Source: Edge Analytics; Turley analysis

- 3.9 The working age population would also be expected to shrink by circa 2% in total – as shown at Figure 3.6 overleaf – while the elderly population, aged 65 and over, could

grow by as much as a quarter. This would increasingly and markedly shift the demographic profile of the Black Country towards older age groups.

Figure 3.6: Modelled impact of reduced housing provision on selected age groups



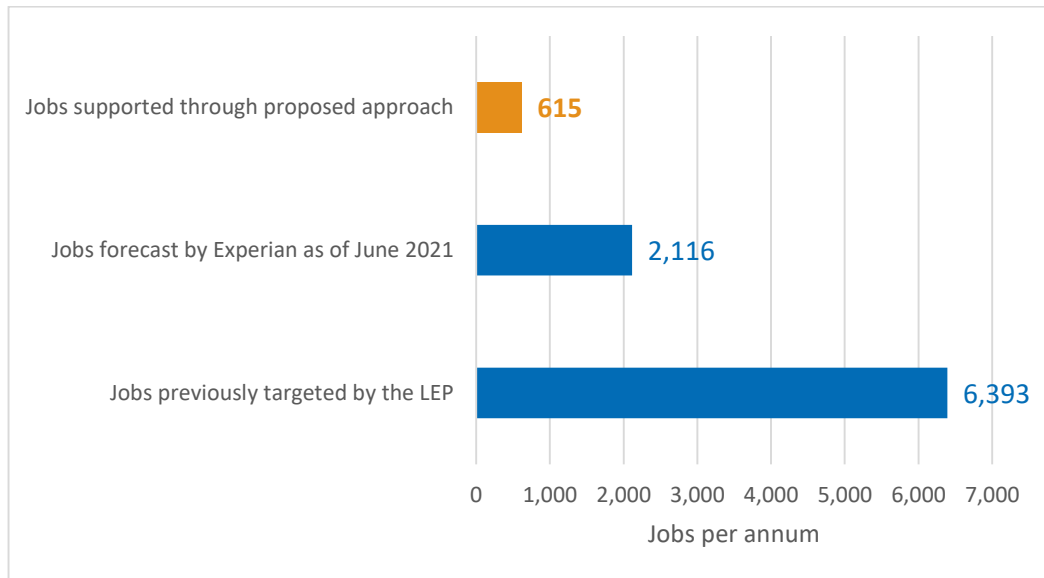
Source: Edge Analytics; Turley analysis

Implications for the Black Country economy

- 3.10 Such limited population growth, combined with a changing age profile, would in turn affect the size of the resident labour force, and its ability to support the creation of new jobs in the Black Country. Edge Analytics' modelling suggests, based on the assumptions detailed at **Appendix 1**, that the labour force could support the creation of only 615 jobs per annum over the plan period if housing delivery aligns with the proposed requirement.
- 3.11 At least one economic forecast, produced by Experian, suggests that the Black Country has the potential to create over three times as many jobs over the same period (2,116pa). The Local Enterprise Partnership (LEP), meanwhile, has previously expressed a target that – although not officially annualised – appears to equate to more than 6,000 jobs per annum if reasonably assumed to cover a period of twenty years²². This is *over ten times* more jobs than could be supported by the Draft BCP, as shown by Figure 3.7 overleaf.

²² Black Country LEP (March 2017) Black Country Strategic Economic Plan. This references a '2030 target of 569,700 local jobs' (p36) and suggests that this would require an increase of 127,860 from an unspecified base date. With the Black Country LEP only established in 2010, however, it appears that the target could be achieved over no more than 20 years at an implied average rate of circa 6,393 jobs per annum

Figure 3.7: Benchmarking job growth annually supported through the proposed approach



Source: Edge Analytics; Experian; Black Country LEP; Turley analysis

- 3.12 The proposed housing requirement will therefore hamper, rather than support, the recovery and growth of the Black Country economy. This is contrary to one of the overarching aims of the Draft BCP, which explicitly seeks to ‘*attract new businesses and jobs*’ to the area and:

“...increase employment opportunities to support the delivery of the Black Country and West Midlands Combined Authority Strategic Economic Plans (SEP), the Local Industrial Strategy and Covid-19 recovery plans”²³

- 3.13 It later describes the LEP’s ‘*overall aim of transforming the sub-regional economy by creating the conditions for enterprise to flourish, resulting in greater economic prosperity across the Black Country*’²⁴. It states that its own ‘*challenge*’ is to maintain the ‘*momentum*’ that has recently led to economic growth, particularly in light of the pandemic, suggesting that ‘*the Black Country Plan is part of that process*’²⁵ in terms of providing employment sites without acknowledging the parallel importance of attracting and retaining labour through making sufficient provision for housing.
- 3.14 The proposed approach to housing supply does not rise to this ‘*challenge*’, threatening instead to stall any ‘*momentum*’ that has developed in recent years. It must therefore be reconsidered, with the aim of further boosting housing supply and retaining the benefits that have recently been generated through increased delivery.

²³ Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and the City of Wolverhampton Council (July 2021) Draft Black Country Plan, paragraph 1.4

²⁴ *Ibid*, paragraph 1.11

²⁵ *Ibid*, paragraphs 1.29-1.30

Summary

- 3.15 The Draft BCP identifies sufficient land to provide only 47,878 homes over the plan period, equivalent to **2,518 dwellings per annum** which is less than two thirds of the reported need for 4,004 homes per year.
- 3.16 It represents **a level of provision that has been exceeded in each of the last six years**, delivery in this period having been boosted by roughly a third (34%) compared to the six years prior. While a similar boost would very nearly meet the minimum need for housing in the Black Country, the Draft BCP instead threatens to bring a 12% reduction compared to the recent trend of delivery over the last six years.
- 3.17 This would **put at risk the benefits generated through the recent boosting of housing supply**. The Black Country has historically experienced a net outflow of people to other parts of the UK, for instance, but this has more than halved over the past six years to suggest that people are being more effectively attracted and retained, helping to restore a trend of growth in the working age population. Demographic modelling commissioned to inform this report suggests that this trend is unlikely to continue where housing delivery is allowed to fall, with the proposal to provide only 2,518 dwellings per annum effectively forcing around 5,525 residents to move elsewhere every year – over three times more than in recent years.
- 3.18 This would be expected to **dramatically slow the rate of population growth and reduce the size of the working age population**. This, combined with potential changes in behaviour, could result in a labour force that is capable of supporting only 615 new jobs per year. An economic forecast produced by Experian suggests, for comparison, that the Black Country actually has the potential to create over three times as many jobs (c.2,100 per annum) while the Black Country LEP has previously expressed a target that seemingly equates to more than 6,000 jobs per year, over ten times more than could be supported through the housing supply identified in the Draft BCP. The proposed housing requirement will therefore hamper, rather than support, economic growth and recovery, conflicting with the Draft BCP's stated intentions.

4. Proposed supply and evidence base

- 4.1 The previous section estimated the impact of delivering in line with the proposed housing requirement, which would fall short of meeting the full housing needs of the Black Country and also appears likely to result in a range of adverse consequences for this area. These would only become more pronounced if the proposed requirement is not or cannot be met, through the supply identified on page 90 of the Draft BCP and summarised below.

Table 4.1: Total BCP Supply

Source of supply	Number of homes (Black Country wide)
Current supply (including existing allocations not being reviewed which are discounted by 10%, commitments which are discounted by 5% and under construction)	21,413
Proposed allocations on occupied employment land (discounted by 15%)	3,091
Sites to be released from Green Belt	7,720
Other urban allocations (discounted by 10%)	6,921
Windfall allowance for small sites of less than 10 homes / 0.25ha	7,651 (circa 402 dpa)
Wolverhampton City Centre upper floor conversions	812
Additional site capacity in strategic centres, to be allocated in Part 2 Plans	1,300
Total gross new homes	48,908
Dudley estimated housing renewal demolitions	-323
Estimated small scale demolition windfalls	-748
Total net new homes 2020-2039	47,837

- 4.2 This section initially reviews the Councils' sources of supply and accompanying evidence base in the context of the NPPF guidance outlined in **Appendix 2**, specifically to ensure that the BCP must be aspirational but deliverable, identifying a sufficient supply of sites taking into account their availability, suitability and likely economic viability. Those sites should meet the tests of deliverable and developable contained in the NPPF glossary. Section 5 then considers whether the identified supply is likely to actually come forward in the manner envisaged.

The structure of the Councils' evidence

- 4.3 The size of each authority and the number/nature of the sites involved inevitably presents challenges.
- 4.4 A Strategic Housing Land Availability Assessment (SHLAA) has been prepared by each authority. It is understood that the SHLAAs are a principal supporting document to justify the Councils' supply, however there is a disconnection between the amount of supply identified in the SHLAAs and the scheduled number of homes in the BCP. The Draft BCP does not include a trajectory illustrating the expected rate of housing delivery over the plan period (apart from an overall figure for each authority), as required by paragraph 74 of the NPPF. The BCP should therefore be updated to include a trajectory detailing the expected rates of delivery for individual sources of supply, for the benefit of the Inspector and interested parties, to readily allow review and scrutiny of the housing supply in the Plan, which is a fundamental issue and affects soundness.
- 4.5 Furthermore, given the complexity in this case of the numerous sources of supply, it is considered that the Councils should set out the anticipated rate of development for specific sites, as directed by NPPF paragraph 74.
- 4.6 The Sites Assessment Report included in the Councils' evidence base specifically considers some sites' constraints, capacity and availability, but the connection between these sites, the SHLAA, and to which total source of supply they are intended to contribute is unclear.

The Black Country Core Strategy assumptions

- 4.7 The BCP is stated to be a Local Plan Review. Paragraph 33 of the NPPF states that reviews should take into account changing circumstances affecting the area, or any relevant changes in national policy. The Council refer back to assumptions derived from the Black Country Core Strategy (BCCS) which was adopted in 2011, more than ten years ago, with an evidence base prepared even before that. The policy context was significantly different, especially in relation to housing provision, than is before us now and under which the BCP will be examined.
- 4.8 The various iterations of the NPPF over the preceding decade have pivoted the emphasis of national policy even further towards significantly boosting the supply of housing, which inevitably requires taking the most robust and realistic approach to what supply is truly deliverable in plan-making.
- 4.9 On this basis, and with full regard to the Councils stating that the BCP is a 'Review', it is concerning that the Councils have attempted to simply roll forward assumptions derived from the BCCS. In the main, these relate to non-implementation discount rates, the deliverability of existing allocations and approach towards some key sources of supply.
- 4.10 The Urban Capacity Review (May 2021) explains the utilisation of various assumptions derived from the BCCS in determining the urban capacity of the Black Country. It is concerning to see given the age of the evidence upon which the BCCS assumptions are based. The assumptions taken forward include:

- Existing allocations not being reviewed which are discounted by 10%; and
 - A 15% discount rate on proposed allocations on occupied employment land.
- 4.11 The Councils also apply a 5% discount rate on sites under construction (considered further below) which has been amended from 10% in the BCCS, but this discount rate has been reconsidered in the 2021 Urban Capacity Review document, and adjusted in the BCP supply assumptions.
- 4.12 It is not appropriate to roll forward these assumptions without due scrutiny of new evidence in this context. The application of realistic discount rates, taking account of the best available evidence since the BCCS, suggests significant changes should be made to the Councils' claimed deliverable housing supply.
- 4.13 The Inspector's report on the BCCS at paragraph 48 stated:
- "48. In particular, we are reassured about the likely potential delivery of new housing by the identified current surplus of about 8% of new housing capacity available against the JCS target, having already allowed for a 15% discount on surplus employment land and a 10% discount on other commitments to take into account delivery constraints, such as ground contamination. Both adjustments seem reasonable and appropriate in general terms for a strategic level assessment, particularly as there is no specific evidence available to justify any preferable alternatives. We therefore conclude that this aspect of the JCS is sound."*
- 4.14 It appears that the BCCS Inspector adopted a set of assumptions in relation to non-implementation rates in a fairly general way, and in the absence of any evidence suggesting any alternative approaches.
- 4.15 As this report will show, in reality sites have not come forward as predicted by the Councils. As a result, a more cautious approach should therefore be taken in the Draft BCP given the evidence which has come to light in the intervening period, and the changing circumstances in national policy.

The relationship with the need for employment land and reliance on the SHLAA

- 4.16 The BCP evidence base²⁶ concludes there is a gap (shortfall) of 140.3 ha against the demand requirement for employment sites in the Black Country area. The Councils state this will need to be addressed through ongoing Duty to Co-operate engagement with neighbouring local authorities.
- 4.17 There are a number of sources of the Councils' housing land supply which are proposed on existing vacant or occupied employment land. The NPPF states that a sufficient supply of employment sites should be provided as well as housing. The NPPF is also clear at paragraph 81 that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for

²⁶ 2021 EDNA and Employment Land Supply Technical Paper 2021

development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

- 4.18 In this way, the reliance on occupied employment sites to deliver housing instead directly contradicts the intention of national policy to support economic growth and productivity.
- 4.19 The NPPF requires there to be a realistic prospect that a site will be available and could be viably developed at the point envisaged. The fact that many sites in the Councils' trajectory are likely to be in demand for employment land, given the shortfall of 140.3ha identified, increases doubt that they will be developed for housing at the point envisaged.
- 4.20 The NPPF also states at paragraph 68 that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their **availability, suitability and likely economic viability**.
- 4.21 Having reviewed the four SHLAAs, which are a key source in determination of the urban capacity in the Black Country, we have concerns with the approach taken, and any plan making decisions based upon them. The SHLAAs state that:
- "Only where a site has a realistically implementable permission for an alternative, non-housing use will it be removed from the list of SHLAA sites"*
- 4.22 This does not account for the likely high number of sites which may have potential for alternative, non-housing uses, but that simply do not benefit from an implementable permission. It could be argued that based on the SHLAA conclusions, these sites are as much possible employment sites as they are housing sites.
- 4.23 If this is the approach taken to understanding the stock of available housing sites, it is vital that reasonable and realistic planning judgement is then applied when relying on their delivery to meet requirements in the plan period.

Considering the type and size of housing likely to be delivered

- 4.24 The NPPF requires planning policies to reflect the size, type and tenure of housing needed, and the BCHMA – as summarised in section 2 – identifies a prevailing need for larger homes that could require two thirds of all new homes over the plan period to be houses.
- 4.25 From review of the Councils' evidence base supporting the Draft BCP, it is unclear if any assessment of the proposed sources of housing supply has been undertaken to ascertain whether this prevailing need for houses will be met. Draft Policy HOU2 ('Housing Density, Type and Accessibility') sets out generic requirements, stating that density and type of new housing provided on any site should be informed by the need for a range of types and sizes to accommodate local needs.

- 4.26 The Councils' forward housing supply is heavily distorted and relies on previously developed land, with circa 85% of all supply coming from non-greenfield sources. This is reflected in draft Policy HOU2 which drives higher densities when certain criteria are met and the site is located within a Strategic Centre or Town Centre. The densities in draft Policy HOU2 are also increased from the previous policy context, with justification included in Section 2 of the Urban Capacity Study.
- 4.27 Given the Councils' forward supply is so reliant on non-greenfield sources, where traditionally certain types and sizes of housing are more readily delivered due to factors such as viability and density, the Councils should closely consider whether the Draft BCP is clear or justified in the approach to supplying the size, type and tenure of housing needed, and what modifications should be made if it comes to light that the BCP is not meeting needs.

5. Assessment of the Councils' housing supply sources

5.1 In assessing whether the 47,837 homes relied on by the Councils is adequately justified and robust, this section considers the following sources of supply:

- Current supply (including existing allocations not being reviewed which are discounted by 10%, commitments which are discounted by 5% and under construction);
- Proposed allocations on occupied employment land (discounted by 15%);
- Windfall allowance for small sites of less than 10 homes / 0.25ha; and
- Wolverhampton City Centre upper floor conversions.

Current supply – 5% discount on commitment and sites under construction

5.2 The current supply source is broken down by source/phasing and local authority below.

Table 5.1: BCP Current Supply by Period

Source	Total	2020-2029	2029-2034	2034-2039
Under construction	5,258	5,258	0	0
Sites with PP or PA	7,380	7,244	136	0
Sites with Other Commitment	3,802	2,002	986	814
Existing HA in Strategic Centres	4,973	1,708	1,795	1,470

Source: Table 3 of Draft BCP

Table 5.2: BCP Current Supply by Local Authority

Source	Dudley	Sandwell	Walsall	Wolverh.	Total
Under construction	978	624	1,255	2,401	5,258
Sites with PP or PA	1,867	2,577	1,105	1,831	7,380
Sites with Other Commitment	833	102	2,691	176	3,802
Existing HA in Strategic Centres	2,506	201	18	2,248	4,973

Source: Table 4 of Draft BCP

5.3 The Councils have adjusted the BCCS discount rate of 10% on sites under construction and which have planning permission, to a lesser rate of 5%. The stated justification for the change is based only on data from Wolverhampton City and is absent of data from the three other authorities. This is considered to be insufficient evidence to warrant a

significant change in approach which affects a large proportion of the Councils' supply (12,638 homes under construction or sites with PP or PA).

- 5.4 Worse still, the data obtained from Wolverhampton City Council only covers a period from 2001 and 2004²⁷. The Council then assert that of the 1,246 homes granted permission in that period, 96% had been built out in the subsequent 17 years.
- 5.5 This does not constitute rigorous evidence to justify the significant change proposed. There is clearly a significant data gap here – the assessment period is very short, and from almost two decades ago, in a different policy context and market conditions. This data gap must be addressed before robust conclusions can be made on what the true level of non-implementation has been in the Black Country.
- 5.6 The Councils should provide evidence on what the non-implementation rates have been in all of the four Black Country authorities, across a practical period, preferably more up to date and comprehensive than considering planning applications granted only between 2001 and 2004. If this evidence is not forthcoming, the Councils should revert to at least the 10% non-implementation rate on sites under-construction.
- 5.7 The Councils' supply from committed sites and those sites under construction, when a 10% non-implementation discount is applied, reverts to (13,270 - the full stock of permissions without a discount applied), 11,943 homes in the plan period, a reduction of 695 homes in the plan period.

Current supply – 10% discount on existing allocations

- 5.8 A total of 4,973 new homes are identified as being deliverable from this source of supply over the new plan period (2020-39) with the largest contributions to supply coming from Dudley (2,506 homes) and Wolverhampton (2,248 homes).
- 5.9 The 'Existing Allocations' included in this source of supply are stated by Table 4 in the Draft BCP as to be located in defined Strategic Centres.
- 5.10 As a result of being located in Strategic Centres, these sites are allocated in the subsequent Area Action Plans (AAPs) that were intended to deliver the strategic policies for those areas of the BCCS. As far as we can tell, there is no new evidence in relation to them in the Draft BCP. The sites are not, for example, listed individually in the Draft BCP but do appear in the SHLAA.
- 5.11 The evidence in relation to the deliverability of these sites is therefore included in the AAPs, within which (from our assessment) there is limited evidence of developer involvement or justification/explanation that the allocations were sound, developable or deliverable.
- 5.12 There are numerous examples in the supporting evidence base and documentation where it is acknowledged by the Councils themselves that there are possible constraints including land ownership, viability, need to relocate existing uses and remediation issues. This immediately casts doubt on whether the sites can be

²⁷ Para 2.1.14 of the Black Country Urban Capacity Review Update (May 2021)

considered developable, which requires the sites to be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 5.13 The BCP Evidence Base includes a Viability and Delivery Study (May 2021), where at para 7.7 it is concluded that:

“The analysis also excludes housing development in Strategic Centres, given that the BCP will not allocate land in the Strategic Centres. No specific sites have been identified in those centres for the purposes of this assessment. The viability assessment above has however found that development there is unviable, even with zero developer contributions. Without grant support therefore, it is likely that no housing – either market or affordable – would be delivered in the Strategic Centres. The viability assessment does not consider what level of grant would be required to make development viable in the centres - because each strategic centre scheme is likely to be unique, with its own set of challenges and subject to site-specific assessment.”

- 5.14 This is a critical finding when considering whether these sites can be relied on to be developed in the plan period.
- 5.15 Turley have analysed the status of existing allocations in the Councils’ evidence base and consider each authority area in turn below.

Existing Allocations in Dudley

- 5.16 The Strategic Centre for Dudley is Brierley Hill. In 2011 the Brierley Hill Area Action Plan was examined and adopted (the AAP sets out the details of the sites to deliver the level of housing growth set by the BCCS 2011). The vision for the area in that Plan was that development would have delivered more than 3,200 new homes by 2026.
- 5.17 Over 26 sites are listed in the AAP as delivering residential uses in the period, the AAP was adopted in 2011 and so the evidence base for these sites is considered dated.
- 5.18 There is an Appendix 3 of the Dudley AAP (Implementation Framework) which shows the investment needed to regenerate the area, including identifying funding gaps and possible issues relocating existing uses. Even at the time of allocating these sites it was acknowledged that significant investment would be needed to bring them forward.
- 5.19 Within the AAP, at Appendix 4, set out the anticipated trajectory for delivery at the time of adoption.

Table 5.3: Projected Net Dwelling Completions in Dudley AAP

	2009-11	2011-16	2016-21	2021-26
Net completions	258	369	127	48

Source: AAP Appendix 4

- 5.20 This delivery has not materialised. The Dudley AMR (2020-2021) explains that the results from this year’s monitoring is ‘consistent with previous years’; i.e ‘limited development has yet taken place within the Brierley Hill APP Plan Area’.

- 5.21 The only development recorded as progressing in the last monitoring year was the redevelopment of the Canal Street Site (DOB H11) for 65 new affordable dwellings which has now completed, with 33 dwellings completed in this monitoring year and 11 residential units as part of an office conversion (see page 37 of AMR).
- 5.22 The evidence base suggests that 291 homes (net) have been delivered in the area since 2011. This is less than was anticipated to be delivered in the first five years following the adoption of the AAP (369 were anticipated 2011-2016).
- 5.23 It is understood that other sites have been granted planning permission, such as Oak Court with 78 approved residential units (ref. P18/1105/PN30 and P19/0830), however completions have not been forthcoming.
- 5.24 The following table sets out completions against the BCCS requirement in Brierley Hill Strategic Centre and shows that just 10.4% of the requirement has been delivered, with a 2,632 home shortfall.

Table 5.4: Brierley Hill Net Completions

13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	Total	Target
5	0	186	15	2	7	25	67	307	2,939

Source: Dudley AMR Housing Completions Section Page 7

- 5.25 The lack of the delivery in the Strategic Location of Brierley Hill is a factor in the under delivery of Dudley as a whole against the adopted CS requirement, as is shown in Table 5.5 below.

Table 5.5: Brierley Hill Completions against target

	2006-16	2016-21	2021-26	Total
Completions	5,834	2,883	–	8,717
BCCS target	8,112	2,670	5,345	16,127
	-2,278	+213	N/A	-7,410

Source: Dudley SHLAA 2019/20 Update

- 5.26 The Draft BCP does not provide an up to date assessment of the deliverability of Existing Allocations in Strategic Centres. They appear to have simply been re-included in the Councils' supply without due scrutiny. The Councils also continue to include AAP sites in their assessment of five year housing land supply.
- 5.27 When reviewing the Council's housing land supply and the sites from the AAP area (page 31 of the 2020 SHLAA) it is clear that there is no up to date evidence to demonstrate that these sites can be relied upon. The evidence for inclusion in the land supply table is described as 'Yield determined through AAP evidence'. This is relying on evidence that was prepared to support a plan that was adopted over a decade ago, where there has been clear and present deliverability issues.

Existing Allocations in Wolverhampton

- 5.28 As with Dudley, the 2,248 homes due to deliver in the Strategic Centre in Wolverhampton (which is the City Centre) are identified in an Area Action Plan, the latest version of which was adopted in 2016. The aim was for 2,043 homes to be delivered by 2026, with 475 of these by 2021.
- 5.29 In this case, the AAP does not even explicitly identify all the sites it relies on to deliver these homes. The Core Strategy targets for the AAP area include 2,130 commitments and 1,100 unidentified sites in the City Centre, and 560 homes on employment land to the south of the City Centre.
- 5.30 At the time of AAP adoption (2016) there had been 470 homes completed in the City Centre and there were 163 homes on committed sites, according the latest SHLAA (2020) there are still 163 commitments to be delivered by 2021. The latest Wolverhampton SHLAA (2020) states that there had been 948 completions in the City Centre between 2006 and 2019. Although the documentation is not explicit, it appears that delivery has fallen behind what was expected and relied on.

Existing Allocations in Sandwell

- 5.31 The supply figures relied on from existing allocations in Sandwell are lower. The Strategic Centre in question is West Bromwich for which an AAP was adopted in 2012. The evidence base was older than that, with Issues and Options in June 2006, Preferred Options in June 2008 and Changes to Preferred Options in January 2011.
- 5.32 The AAP should have delivered 201 homes before 2026, however it is difficult to identify specific numbers allocated as the adopted AAP is vague.
- 5.33 It is acknowledged that delivery may be slow in the AAP itself with paragraph 4.3 stating that some of the opportunity areas are considered to be more long term and in some instances will require other proposals to have come forward first before they can be delivered.
- 5.34 It is apparent that there are a number of allocations where delivery issues have come to light in the period since adoption of the AAP. The Lyng Industrial Estate, for example, was relied on for 300-430 homes, but Table 9 of SHLAA now assigns this site under the category "Sites allocated for housing but now considered not suitable / developable up to 2039". The change arises from the viability and feasibility study commissioned which highlighted significant viability issues. In addition, the Eastern Gateway North site was identified for around 100 dwellings in the AAP and is now acknowledged in the SHLAA to have delivery issues relating to its occupation, the generally poor condition of the buildings and external environment and the fact that businesses would need relocating if the site was to come forward for residential development.

Existing Allocations in Walsall

- 5.35 The Walsall Town Centre AAP (adopted in 2019) allocated the following sites for residential uses as shown on the Policies Map:
- TC11 Kirkpatricks, Charles Street; and
 - TC15 FE Towe Ltd, Charles Street.

- 5.36 Both sites are industrial employment sites proposed to be redeveloped. The sites are now expected in the period 'post 2025' according to the 2020 SHLAA. This AAP was more recently adopted than some of the other AAPs, in 2019, and the Councils only appear to rely on 18 homes from this source in the Draft BCP.

Conclusion on Existing Allocations

- 5.37 This source of supply (Existing Allocations in Strategic Centres not subject to review through the BCP) is relied on to deliver 4,973 homes between 2020 and 2039. The Councils claim that the application of a 15% discount rate to these sites is adequate to account for non-implementation.
- 5.38 There is significant doubt that the sites making up this source of supply are either deliverable or developable.
- 5.39 The sites are included in documents prepared in the context of the BCCS, and some are more than ten years old. There is a clear record of delivery issues with these allocations, with many of the Strategic Centre AAPs delivering significantly less than was originally anticipated.
- 5.40 They should not be relied on in the Draft BCP without investigation of site specific evidence through which it can be demonstrated that the sites are deliverable and developable, and thereby passing the NPPF tests. If site specific evidence is available to suggest the sites are deliverable or developable (which we do consider may exist for some sites), then they should be re-allocated through the Draft BCP, and fall into another source of the Councils' supply.
- 5.41 We propose that beyond that no reliance should be placed on sites that have previously been allocated but have not come forward. If the allocations had come forward as planned, they would presumably be now counted as commitments
- 5.42 Furthermore, the Council's own Viability and Delivery Study concludes that existing allocations in Strategic Centres are unviable.
- 5.43 As a result, without the necessary evidence base, it is necessary to **remove the 4,973 homes**, being the total quantum of homes relied on from this source in the plan period. It is nonetheless considered that some of this number could be offset through appropriate re-allocation, or identification of a specific existing allocation where up to date evidence is provided to confirm there is a reasonable prospect that they will be available and could be viably developed at the point envisaged.
- 5.44 Continued reliance on existing allocations where there is no realistic prospect they will come forward carries a risk of further compounding the pattern of delivery failure.

Proposed allocations on occupied employment land – discounted by 15%

- 5.45 The Councils rely on 3,091 homes in the plan period from this source. When considered against the NPPF tests, which emphasises '*availability*' as a key tenet of being both developable and deliverable, these sites are unavailable as they are presently occupied by existing uses. There are particular risks with bringing forward occupied employment sites, in that they:

- have existing commercial value
- require business relocation
- are often in multiple ownerships without any form of collaboration agreement or equalisation
- have other commercial considerations (such as lease status)
- require land assembly
- will most likely require complex phases of remediation and new infrastructure

5.46 Whilst the Councils do highlight that investment may be forthcoming to assist land assembly and viability, specific evidence should be submitted for what sites this may affect. The allocation of occupied employment land for housing, in the context of the Councils' own evidence base concluding that there is a gap (shortfall) of 140.3 ha against the demand requirement for employment sites in the Black Country area, casts doubt over whether there is a reasonable prospect that any of this source of supply is developable at all.

5.47 The Councils report, in the Urban Capacity Review, the following historic rates on occupied employment sites.

Table 5.6: Homes Allocated and Delivered on Occupied Employment Land

LPA	Allocated (ha)	Allocated (homes)	Delivered (ha)	Delivered (homes)	% delivered (ha)	% delivered (homes)
Dudley	133	4336	0.5	20	0.38%	0.46%
Walsall	75	N/A	0	N/A	N/A	N/A
Sandwell	311	10541	14	578	4.50%	5.48%
Wolverhampton	43.5	1305	1.5	81	3.45%	6.21%
Total	562.5	16182	16	679	2.84%	4.20%

Source: Turley Analysis of BCP Urban Capacity Review May 2021 Statistics

- 5.48 The above demonstrates that of the occupied employment land allocated in the previous round of development plan documents associated to the BCCS, just 4.2% of the homes have been delivered.
- 5.49 It is acknowledged that there are additional permissions which have been granted (193 homes on 4.5ha of land in Dudley, and 510 homes on 23ha of land in Sandwell) but these do not substantially change the conclusion, and these sites remain undelivered.
- 5.50 The NPPF states that Local Plans must be aspirational but deliverable. We suggest that a precautionary approach to occupied employment sites as a source of supply must apply given the local track record of delivery, and due to the known constraints to delivery of these sites.

5.51 The precautionary principle should apply even more so, given the findings of the Councils' evidence base and conclusions on employment land over the Draft BCP plan period.

5.52 The Councils apply a 15% discount rate to account for non-implementation, but it is considered that this does not go nearly far enough. The Councils state that the 15% non-implementation rate is supported by the GL Hearn Greater Birmingham HMA Strategic Growth Study (2018) which endorsed application of a 15% discount in the Black Country to:

"...take account of the significant proportion of the land supply which comprises employment sites where there are challenges associated with delivery related to assembling land, relocating existing occupiers, and development viability."

5.53 Paragraph 4.123 of that report acknowledges that the discount is:

"...judgement-based and applied for the purposes of this report only and should not be considered to prejudge what allowance should be made for non-implementation in individual local plans or authorities' land supply assessments, which can take account of locally-specific circumstances and evidence."

5.54 It is clear then that the 15% discount was not intended to be relied on in Local Plan preparation, and does not assist in endorsing the Black Country authorities' approach on this matter. It is still necessary for the Councils to prepare their own, authority specific, evidence to support their approach.

5.55 Dudley have undertaken a landowner engagement exercise in relation to assessing the availability of existing employment sites. The Dudley Employment Landowner Engagement Technical Report (August 2021) Appendix B sets out the responses to a direct land owner approach survey. There appears to be **only two sites out of circa 45 sites** documented where the owners have confirmed availability for the proposed use and the site has also been submitted into the SHLAA for housing availability.

5.56 For the significant majority of sites proposed in the Landowner Engagement Exercise Technical Report his document to be re-allocated for housing, the evidence suggests that no response was received from the landowner.

5.57 Evidence from only one of the four authorities covered by the BCP is insufficient to justify an approach with such strategic implications.

5.58 Given the Councils' track record of delivery and the findings of their evidence base, the BCP should only include sites on occupied employment land that is known to be available, suitable and where some evidence is available of likely economic viability.

5.59 In reality this involves removal of all sites where there is any ambiguity around leases/current employment occupation etc.

5.60 This results in a **reduction of the full 3,091 homes** relied on from this source in the plan period, based on the Councils' current limited and insufficient evidence base. However, it is suggested that some of this number could be offset through appropriate re-

allocation, or identification as specific developable existing allocations where up to date evidence provided to confirm there is a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Wolverhampton City Centre upper floor conversions

- 5.61 Being unallocated sites, the upper floor conversions source of supply comprises a windfall allowance.
- 5.62 The principle behind reliance on a significant windfall from 'upper floor conversions' in Wolverhampton presumably comes from the NPPF reference at paragraph 71 which states that any allowance can consider expected future trends.
- 5.63 Following consultation in December 2020, the Government proposed a number of amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) which have now been laid before Parliament in the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021. The changes include Class MA business and commercial to residential permitted development rights, which in practice provide permitted development ('PD') from Class E to Class C3 residential. The rights took effect from 1st August 2021.
- 5.64 There is no evidence to show what delivery has materialised from this source in previous years and there can be no up-to-date and reliable data to show the potential from this source as a result of the expansion of the above PD rights.
- 5.65 Paragraph 71 also states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be **compelling evidence** that they will provide a reliable source of supply.
- 5.66 To this end, the NPPF clarifies that windfall allowances should be realistic, with regard had to the strategic housing land availability assessment and historic windfall delivery rates. There is no evidence in the SHLAA or any data on historic windfall delivery rates of this nature in the Black Country.
- 5.67 There is no compelling evidence currently provided that a windfall allowance of this nature will provide the supply claimed.
- 5.68 There are limitations on the scale, conditions to the rights (including that the building must be vacant for 3 months prior to application) and the take-up/market impacts of this change remain to be seen in practice.
- 5.69 If upper floor conversions are to form part of the Councils' supply, then they should be considered a part of the windfall allowance, which is identified as a separate source.
- 5.70 We suggest **removal of this source entirely (812 homes)**, as no compelling evidence has been provided to demonstrate that this will constitute a source of supply in the plan period, nor can possibly be available given the time elapsed since the relevant policy change has been in place. If evidence is provided that a realistically consistent source of windfall will arise from upper floor conversions, then they should be considered as part of the main windfall allowance.

Summary of recommended adjustments

- 5.71 This section has considered the Councils' proposed sources of the supply against the NPPF guidance that the Plan must be aspirational **but deliverable/developable**. In identifying a sufficient supply of sites the NPPF states that the Councils must consider that those sites are deliverable or developable and account must be taken of their availability, suitability and likely economic viability.
- 5.72 Concerns have been identified in relation to four of the Councils' sources of supply, and this section sets out the reasons why adjustments should be made to the assumptions made on these sources, in the absence of robust evidence to demonstrate they are deliverable/developable.
- 5.73 Based on the above, and amending the Draft BCP to achieve accordance with the NPPF, we recommend the following adjustments to the Councils' land supply:

Source	Council Assumption	Turley Assumption	Difference
Commitments	12,638	11,943	-695
Existing Allocations	4,973	0	-4,973
Occupied Employment Land	3,091	0	-3,091
Wolverhampton CC upper floor conversions	812	0	-812
Plan Period Total	21,514	11,943	-9,571

- 5.74 These adjustments are clearly significant, and result in the Councils being only able to deliver 38,266 homes in the plan period, which would amount to delivering only half of the reported need for at least 4,004 homes per annum. This would accentuate the aforementioned consequences of failing to meet need in full.

6. Conclusions

- 6.1 Turley has been commissioned by a consortium of six developers to critically review the approach to housing provision that is proposed in the Draft Black Country Plan ('the Draft BCP') which is currently out for consultation until 11 October 2021.
- 6.2 The Draft BCP acknowledges an overall need for 76,076 homes throughout the Black Country over the plan period (2020-39). This equates to an average of **4,004 dwellings per annum**, aligning closely but not exactly with the minimum need for 4,011 dwellings per annum currently suggested by the standard method.
- 6.3 While either figure implies a need for more homes than have been delivered in any year since at least 2006 – with no more than 3,129 homes per annum having been provided in this time – it would actually only require the existing housing stock to grow at an average rate of 0.7% per annum. This is less than is needed either regionally or nationally, according to the standard method (0.8/1.1%) and indeed aligns exactly with the average housing growth seen across the West Midlands as a whole since 2006.
- 6.4 The outcome of the standard method for the Black Country therefore should not be viewed as excessively high, but instead a reasonable benchmark of the *minimum* need for housing in this area. It would boost the historic rate of delivery, in line with the Government's ambitions, and allow Wolverhampton – as one of the country's largest cities – to contribute towards meeting a nationwide need for housing. There may well be an even greater need for housing given that the standard method makes no attempt to predict the impact of changing economic circumstances, for example, and the Councils' evidence base does not properly consider whether there will be sufficient labour to meet the economic growth ambitions of this area. It equally provides no assurance that the prevailing need for houses, estimated to account for two thirds of the overall housing need in the Black Country, can and will be met through the proposed supply.
- 6.5 The Draft BCP intends to make provision for only 47,837 homes over the plan period, equivalent to **2,517 dwellings per annum**. This represents a level of housing provision that has been exceeded in each of the last six years, when roughly a third (34%) more homes have been delivered – at an average rate of 2,863 homes per annum – compared to the six years prior. The Black Country has seen tangible benefits as a result, more effectively attracting and retaining people than has been the case historically and once again growing its working age population.
- 6.6 Rather than planning positively for a similar boosting that would very nearly meet the minimum need for housing suggested by the standard method, the Draft BCP instead threatens to reduce the recent rate of delivery by 12%. Demographic modelling suggests that this would dramatically slow the recent rate of population growth and effectively force around 5,500 residents to move elsewhere every year, over three times more than in recent years. The associated reduction in the size of the working age population, combined with potential behavioural changes, would be expected to leave a labour force capable of supporting only 615 new jobs every year, whereas at least one economic forecast suggests that the Black Country has the potential to create

over three times as many jobs (c.2,100 per annum) and the LEP has previously expressed a target that – when annualised – appears to be over ten times greater, at in excess of 6,000 jobs per annum.

- 6.7 This assumes that the proposed requirement can be met through the supply identified in the Draft BCP, which may not be the case based on the analysis in this report. The NPPF requires Local Plans to be aspirational but deliverable, identifying a sufficient supply of sites taking into account their availability, suitability and likely economic viability. Those sites should meet the tests of deliverable and developable contained in the NPPF glossary. It is vital to realistically assess the amount of deliverable supply in plan period, as to overestimate the amount of housing coming forward in the plan period, as appears to be the case here, causes a significant planning harm connected to the unnecessary creation of an acute shortfall of housing when individuals require them.
- 6.8 The Black Country authorities have evidently made a set of assumptions in relation to the housing capacity and deliverability of certain sources of supply, relied upon in the Draft BCP. This report has assessed the proposed sources of supply and identified significant concerns with the assumptions being relied on, with a clear absence of any up-to-date and robust evidence. In some areas the Councils' assumptions are not rigorous enough, the evidence base is inadequate to draw out the conclusions being relied on, and in our opinion the justification provided falls short given the context and scale of the implications of misjudging the true amount of housing supply.
- 6.9 Setting realistic delivery assumptions, as required by the NPPF, is essential as planning harm arises when delivery does not come to fruition. This is evident in the Black Country, where there has been clear issues in delivering sites previously identified in the Black Country Core Strategy (BCCS). Despite this, the Councils seek to simply roll forward the approach taken in that previous plan, with little scrutiny or regard to the effectiveness (or not) of that strategy. This report highlights that:
- In relation to non-implementation of commitments, the Councils seek to lower the opposed discount rate based on entirely inadequate evidence, and we propose a **reduction of 695 homes** to this source in the plan period;
 - The Councils rely on existing allocations from previous Plan documents, which are not subject to review through the BCP but have evidently struggled to come forward in the preceding decade. We therefore propose a **reduction of 4,973 homes** to this source in the plan period;
 - The Councils rely on a significant amount of supply from currently occupied employment land, on which there is patently no reasonable prospect that development will come forward at the point envisaged considering the local delivery track record on employment sites, and the wider economic context. The Councils' strategy on these sites may contradict the wider context in the NPPF which also seeks to ensure a sufficient supply of employment sites. We propose a **reduction of 3,091 homes** to this source in the plan period; and
 - The Councils rely on a significant number of dwellings in Wolverhampton City Centre, where upper floor conversions of retail units are expected to come

forward at a given rate. There is no compelling evidence to include this windfall allowance in the BCP supply, and we therefore suggest removal of the entirety of this source (**812 homes**) in the plan period.

- 6.10 Based on the above, we conclude that the Draft BCP exaggerates the housing supply that is likely to come forward from its identified sources, by **almost 10,000 homes**. Unless additional sites are identified, this could lead to the provision of only 38,266 homes over the plan period, or 2,014 dwellings per annum, which is barely half of the identified minimum need for housing in the Black Country. With this report showing that even delivering in line with the proposed requirement would have negative consequences for the area, it follows that these consequences would be even more pronounced if delivery were to be lower still.
- 6.11 In progressing the BCP, the Black Country authorities are encouraged to fundamentally reconsider the proposed approach to housing provision, adding to and scrutinising the identified supply with the aim of further boosting delivery and meeting housing needs in full.

Appendix 1: Demographic modelling assumptions

This report has referenced demographic modelling produced by Edge Analytics using the industry-standard POPGROUP suite of software. A single scenario has been developed to explore the population growth that could be accommodated over the plan period through the proposed supply of 2,518 dwellings per annum throughout the Black Country, distributed according to Table 4 of the Draft BCP²⁸, as well as the employment growth that could be supported as a result.

In essence, this scenario calculates its own assumptions on internal migration (i.e. inflows and outflows of people of different ages, to and from other parts of the UK) which apply from 2020 as the start of the plan period. A larger net inflow is assumed to occur where there are sufficient homes to accommodate it, while a larger net *outflow* is assumed if not. This has been modelled for individual authorities but aggregated to the Black Country for reporting purposes.

The following assumptions have been applied in developing this scenario:

- Age-specific fertility and mortality assumptions have been derived from the latest available 2018-based sub-national population projections (SNPP);
- The profile of internal migrants has been derived from the alternative internal migration variant of the 2018-based SNPP, albeit the absolute number of such migrants deviates from this projection depending on the number of homes available;
- The inflow and outflow of international migrants is assumed to align with that suggested by this same variant of the 2018-based SNPP, where it makes an identical allowance to the principal projection;
- The population is converted to households through the application of official 2014-based headship rates, rather than using the assumptions made in subsequent household projections that are widely accepted to be less reliable. These rates have, however, been adjusted in line with the principles of the standard method to allow for a gradual return to the higher rates of household formation seen amongst younger people in 2001, where this is not already anticipated by the official projections²⁹;
- Households have been converted into dwellings by applying vacancy rates drawn from Council Tax statistics for 2020, which range from 1.5% in Walsall to 2.5% in Sandwell³⁰;
- The age- and gender-specific economic activity rates recorded in each authority by the 2011 Census have initially been applied, but the local rates for those aged 16 to 89

²⁸ 697 dwellings per annum in Dudley; 482 dwellings per annum in Sandwell; 702 dwellings per annum in Walsall; and 637 dwellings per annum in Wolverhampton

²⁹ This approach results in adjustments being applied for the 25-34 age group only

³⁰ MHCLG (November 2020) Council Taxbase 2020 in England

have been adjusted to reflect national forecasts produced by the Office for Budget Responsibility³¹;

- There is assumed to be no change from the commuting ratios recorded by the 2011 Census, with a small net out-commute therefore assumed for the Black Country as a whole;
- The unemployment rate is assumed to align with the average recorded over the past five years³² (2016-20), generally allowing for a slight rise from the levels recorded in 2020 – except in the case of Dudley – but remaining lower than the long-term averages; and
- A fixed proportion of employed people are assumed to occupy more than one job ('double jobbing') based on the long-term average of 2.3% recorded over the last ten years throughout the Black Country by the Annual Population Survey.

³¹ Office for Budget Responsibility (July 2018) Fiscal Sustainability Report

³² ONS (2021) Model-based estimates of unemployment

Appendix 2: NPPF extracts

The National Planning Policy Framework was revised in July 2021. Set out below are the parts of the NPPF that are felt to be most relevant to the consideration of housing land supply in plan making.

Paragraph 16 states Plans should:

(a) be prepared with the objective of contributing to the achievement of sustainable development;

(b) be prepared positively, in a way that is **aspirational but deliverable**;

Paragraph 33 states that Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary. Reviews should be completed no later than 5 years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every 5 years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

Paragraph 62 states the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

Paragraph 68 states that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account **their availability, suitability and likely economic viability**. Planning policies should identify a supply of:

(a) specific, **deliverable sites** for years 1 to 5 of the plan period; and

(b) specific, **developable sites** or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

In respect of what is considered a 'deliverable' or 'developable' site for the purposes of paragraph 68, a definition is included in the NPPF Glossary:

Deliverable

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

Developable

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Paragraph 71 states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be **compelling evidence that they will provide a reliable source of supply**. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

Paragraph 74 states strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.

Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

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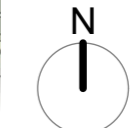
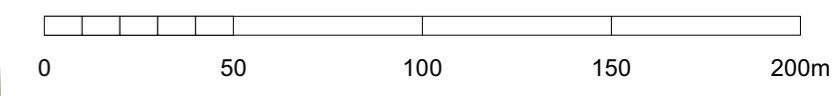
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Appendix 2: Development Framework Plan
(submitted as part of DC/23/68822)



NOTES
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- Key**
- Site Boundary 27.00Ha
 - Proposed Residential Development 3.91Ha
 - Proposed Green Infrastructure (Includes indicative roads crossing green infrastructure) 23.09Ha
 - Indicative main vehicular routes
 - Indicative relocated Beacon Way
 - Indicative segregated cycle link
 - Indicative LEAP Play Area with 20m offset
 - Proposed attenuation features
 - Proposed vehicular access
 - Indicative pedestrian / cycle access
 - Indicative emergency / cycle access
 - Existing vegetation
 - Retained / existing moat
 - Existing Public Right of Way / footpath
 - Existing contours

P11	27.10.2023	Plan updated to client comments.	OWB	KMN
rev	date	description	drn	chk

fpcr

- masterplanning
- environmental assessment
- landscape design
- urban design
- ecology
- architecture
- arboriculture

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client
Wain Estates

project
Land north of Wilderness Lane, Great Barr, Birmingham

drawing title
Development Framework Plan

scale	1:2000 @ A2	drn	OWB	chk	KMN	date created	27 JULY 2023
project number	9364	status	S1	issue	P11		

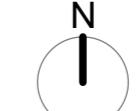
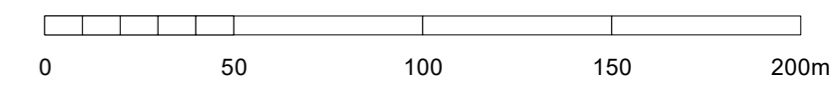
document number
09364-FPCR-XX-ZZ-DR-L-0010

Project Code - Originator - Zone - Level - Type - Role - Drawing Number

Appendix 3: Illustrative Masterplan (submitted as part of DC/23/68822)



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- Key**
- Site Boundary 27.00Ha
 - Proposed dwellings
 - Proposed Green Infrastructure (Includes indicative roads crossing green infrastructure) 23.09Ha
 - Proposed vehicular access
 - Indicative pedestrian / cycle access
 - Indicative emergency / cycle access
 - Indicative Primary Street
 - Indicative Informal Footpath route
 - Indicative segregated cycle link
 - Potential location for interpretation board
 - Potential location for bench / resting area
 - Proposed tree planting
 - Proposed historic hedge replanting
 - Proposed SuDS
 - Indicative LEAP Play Area with 20m offset
 - Existing Tree and hedgerows
 - Trees/hedges to be removed
 - Retained/ existing moat
 - Existing Public Right of Way / footpath
 - Existing contours
 - Indicative mown grass footpath route

P07 27.10.2023 Plan updated to client comments. OWB KMN

rev	date	description	drn	chk

masterplanning •
environmental assessment •
landscape design •
urban design •
ecology •
architecture •
arboriculture •

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client
Wain Estates

project
**Land north of Wilderness Lane,
 Great Barr, Birmingham**

drawing title
Illustrative Masterplan

scale 1:2000 @ A2	drn OWB	chk KMN	date created 18 AUGUST 2023
project number 9364	status S1	issue P07	

document number
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Project Code - Originator - Zone - Level - Type - Role - Drawing Number

Appendix 4: Falling Even Shorter: an updated review of unmet housing needs in the Greater Birmingham and Black Country Housing Market Area Report (December 2023)

Falling Even Shorter

an updated review of unmet housing
needs in the Greater Birmingham and
Black Country Housing Market Area

December 2023

Turley

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6. Conclusions and recommendations	14

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1. Introduction and purpose

Turley is instructed by a consortium of housebuilders and land promoters to provide an updated assessment of the position relating to housing need and land supply across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA' or 'HMA') in order to quantify the true scale of unmet need to 2031, and beyond.

It is now more than two years since the Turley 'Falling Short' report was published. That report critiqued the 'third position statement', published by the GBBCHMA authorities in September 2020, which claimed only a 2,597 housing shortfall remained across the HMA up to 2031. The Turley 'Falling Short' report found that there was a minimum shortfall up to 2031 of almost 9,000 homes.

An addendum to the third position statement was published in December 2020 followed 'Falling Short' indicating that the scale of unmet need as of 31 March 2020 was 6,302 homes. Since then a further addendum to the third position statement was published in April 2023, that now claims a shortfall of 2,053 homes across the GBBCHMA as of 31 March 2021.

Given the wider national planning policy context, since 'Falling Short' no GBBCHMA authority has adopted a new local plan and progress has been faltering:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years.
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

That is despite only North Warwickshire having a plan less than five years old, with the four Black Country authorities not having a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities having a plan adopted over ten years ago as of January 2024.

The lack of plan making progress is at risk of significantly impacting a number of the 14 HMA authorities' ability to meet their housing needs, as required by NPPF paragraph 35. This update to 'Falling Short' therefore seeks to quantify the scale of the unmet need across the GBBCHMA as of 31 March 2023. This includes critiquing the GBBCHMA's most recent position statement, published in April 2023, with a base date of 1 April 2021.

Purpose of this report

This report provides the consortium's independent assessment of the overall housing need and supply position so as to identify the true updated scale of unmet need, focusing on the period to 2031.

The focus upon 2011 to 2031 reflects the timeframe covered by the position statements, as well as various other evidence base studies concerning need and supply prepared since 2013. As with 'Falling Short', this report does consider the position beyond 2031 in high level terms up to 2036 and 2040, mindful that NPPF paragraph 22 requires local plan strategic policies to look ahead over a minimum 15 year period from adoption and set a vision that looks further ahead (30 years), and that all emerging plans are considering plan periods beyond 2031.

The consortium

The consortium comprises the following housebuilders and land promoters, all of whom play a key role in the strategic planning of sustainable housing delivery across the HMA and wider West Midlands region:

- **Bellway Homes**
- **Catesby Estates Plc**
- **Gladman Developments Ltd**
- **Hallam Land Management**
- **Harworth Group Plc**
- **Taylor Wimpey**
- **Vistry Group Plc**
- **Wain Estates**
- **William Davis Homes**

Report structure

The report is structured as follows:

- **Section 2** summarises the most up to date GBBCHMA unmet need context.
- **Section 3** assesses the scale of housing need to 2031, and beyond.
- **Section 4** provides an overview of the most up-to-date position in respect to the GBBCHMA's total housing supply for 2011 to 2031.
- **Section 5** draws conclusions on the scale of unmet need to 2031 and beyond, taking into account the HMA's total need and evidenced supply.
- **Section 6** sets out the overall conclusions in respect to the scale of the unmet need.

2. Update to GBBCHMA unmet need context

This section provides an update on the GBBCHMA unmet need context, including the current starting point for calculating the unmet need.

GBBCHMA Position Statement Addendum (April 2023)

The Position Statement Addendum (the 'Addendum'), dated April 2023 and published in October 2023, provides the supply and shortfall position across the GBBCHMA between 2011 and 2031 as of 31 March 2021. The Addendum continues to use the Greater Birmingham HMA Strategic Growth Study ('SGS') (2018) prepared by GL Hearn and Wood as the starting point for calculating the HMA's housing needs. This is reflected on further at section 3 of this report in determining the scale of need for housing across the GBBCHMA.

The Addendum also continues to consider the level of unmet need **up to 2031**, this reflects the timeframes for the SGS, which essentially uses the Birmingham Development Plan's plan period as its starting point.

The Addendum claims the HMA has a housing supply of 205,926 homes for 2011-2031 as of 31 March 2021. Against the SGS' 'baseline' housing need for the same plan period of 205,099 homes, and factoring in a contribution to the Coventry and Warwickshire Housing Market Area ('CWHMA') of 2,880 homes, the Addendum indicates that the remaining shortfall of housing across the HMA has reduced to 2,053 homes.

The Addendum's base date is now more than two years' ago. Firstly, there has been two years' worth of additional monitoring data, and in some cases, updated supply positions, which essentially renders the position in the Addendum out of date (which is explored further at section 4 of this report in terms of how the supply position across the HMA is assessed).

Secondly, in that time there has been limited local plan progress across the entire HMA.

Local plan progress

With circa 43% of the entire GBBCHMA comprising Green Belt, local plans are an absolutely critical tool in ensuring the HMA meets its housing needs. It is clear that brownfield land will not be enough to meet the HMA's needs, as demonstrated by the shortfall that still remains unaccounted for from the Birmingham Development Plan adopted nearly seven years' ago, and the emerging Dudley and Sandwell plans and their associated evidence bases (which are discussed below).

Almost three years have passed since 31 March 2021. In that time there has been limited progress in advancing local plans across the HMA. Even since April 2023, the context has significantly changed and plan making across the HMA has faltered, as summarised below:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years. Following this each local authority is now preparing its own individual plan. So far Sandwell has published a draft plan with a 18,606 housing shortfall (62% of the borough's total need), and Dudley's draft plan proposes a shortfall of 1,078 homes (9% of the borough's total need).
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to their issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021. The examination was paused in June 2023, pending any updates to the NPPF.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

This is despite national planning policy requiring reviews of plans every five years. Only North Warwickshire have a plan less than five years old, the four Black Country authorities do not have a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities have a plan adopted over ten years ago as of January 2024

Furthermore, it does not appear that this position will change in the short term. Just four authorities have local development schemes committed to submitting a plan before the end of 2024, with a further three committed to submitting before the end of 2025.

With the HMA significantly constrained by Green Belt, local plans are critical to ensuring its housing needs are met in full as brownfield land will not have sufficient capacity alone. Without local plans being advanced reviewing Green Belt boundaries, it is unlikely the GBBCHMA's housing needs can be met in full. This is the critical matter that this report will explore.



3. Scale of need up to 2031 and beyond

Considering the need to 2031

The Addendum continues to reference the ‘baseline’ scenario from the SGS, which suggests a minimum need for 205,099 homes between 2011 and 2031 or 10,255 homes per annum on average.

While this technically remains the last study to have consistently assessed need in all 14 authorities, it is clearly becoming increasingly dated having been finalised almost six years ago in February 2018, and no doubt produced over an extended period prior to that. The extent to which the SGS continues to represent ‘up-to-date evidence’, of the kind that the NPPF at paragraph 31 expects to underpin all planning policies, is therefore open to question. It patently does not allow for the population of the HMA to be some 4% larger than it was then, nor for the area to offer around 8% more jobs, and for the affordability of housing relative to earnings to have worsened in every single authority by an average of 19%¹.

The SGS has undoubtedly had value in providing a consistent assessment of need across the HMA, but circumstances have changed with the introduction of a standard method that has now been required to form the basis of plan-making for almost five years. It was explicitly designed to standardise assessments of housing need, bringing consistency between local authorities and consequently filling at least part of the role formerly played by the SGS. Many of the authorities in the HMA appear to have taken the same view, having commissioned various studies that feature the standard method which generally consider it to provide a reliable indication of their local housing need.

As such, it is highly relevant to note that the standard method suggested a greater need for some **11,868 dwellings per annum** as of April 2021, the base date of the Addendum.

However, this is known to have underestimated the full need as it included a figure for Birmingham that was capped above an existing requirement, but the lifting of the cap in January 2022 – when the Birmingham Development Plan became more than five years old – elevated the need to **at least 13,868 dwellings per annum** and it subsequently rose even further, to at least **14,341 dwellings per annum** in April 2023, when new affordability data was taken into account.

This should not necessarily replace in full the scenario developed in the SGS, which looked back to 2011, but that should equally not take precedence over a standard method that has now been in place for almost five years. The NPPF makes clear at paragraph 61 that it should be used to assess the minimum need for housing in all but exceptional circumstances, which have clearly not been demonstrated by the local authorities in this area.

A sensible and rational approach in these circumstances, which provides a level of consistency with the SGS while adhering to current national policy, would be to align with the SGS ‘baseline’ scenario in the ten years to the base date of the Addendum (2011-21) before aligning with the outcome of the standard method, as of the base date of April 2021, for the second ten-year period² (2021-31). This results in a minimum need for **221,230 homes** over the entire twenty years, some 8% more than suggested by the PSA³.

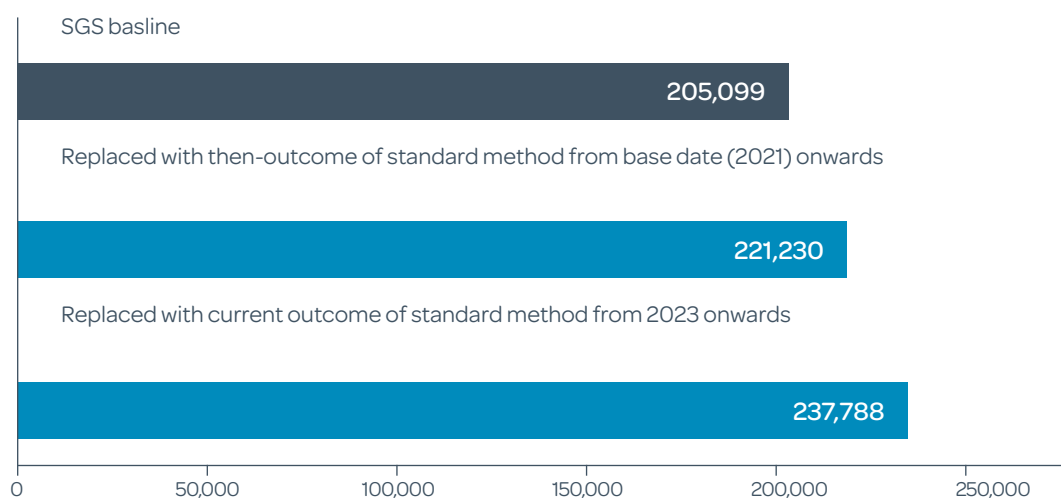
That said, with the outcome of the standard method known to have been an underestimate in April 2021 – rising thereafter, due to worsening affordability and the lifting of the cap in Birmingham – it is arguably also appropriate to consider a scenario based on the current outcome of the standard method (14,341dpa). This would suggest a substantially greater need – for some 237,788 homes in total – even if it was to be applied only from 2023 onwards, reverting to the SGS for the prior two years to avoid using the outcome of the standard method so retrospectively.

¹ Comparing data for 2022 to equivalent figures for 2015, where this appears to have been the latest population data available when the SGS was prepared (according to its paragraph 3.26)

² 11,868 dwellings per annum

³ Excluding the 2,880-home contribution to the Coventry and Warwickshire HMA, which – though included in the Addendum – is considered separately in this report’s section 5

Figure 3.1: Turley Estimates of Overall Housing Need (2011-31)



Source: Turley analysis

Looking beyond 2031

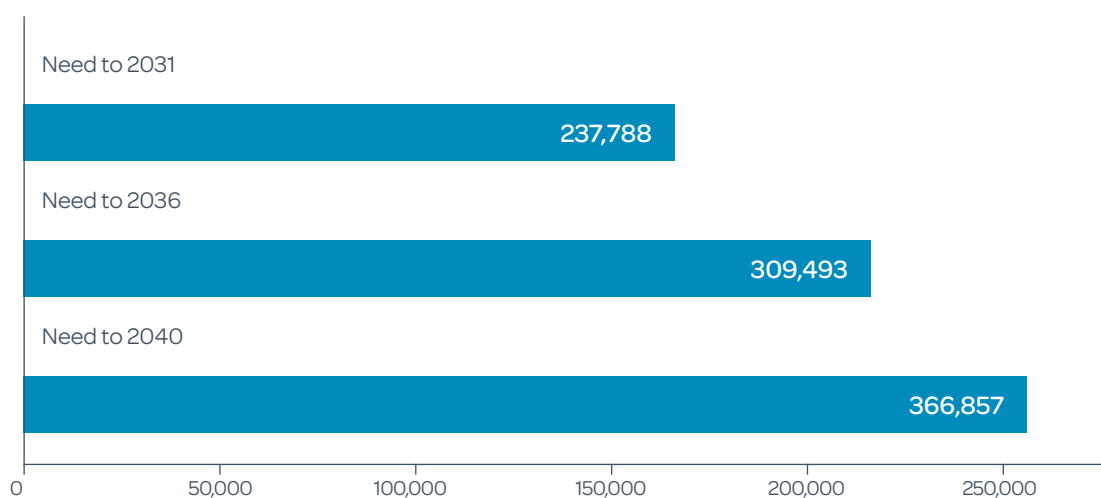
While the above – like the Addendum – provides an estimate of need to 2031, it can be easily extended to cover a longer period to 2036 or 2040.

This is important because NPPF paragraph 22 requires emerging local plans in the HMA to look at least 15 years into the future, such that they are seeking to deliver strategic growth into the late 2030s and even beyond in some cases.

While the standard method technically draws upon a ten-year baseline, the PPG makes clear that its outcome can be extrapolated as necessary to cover any period⁴.

It is not considered appropriate to extrapolate the capped figure in this way but using the current outcome of the standard method from 2023 onwards and using the SGS 'baseline' to that point, suggests that some 309,493 homes are needed throughout the HMA between 2011 and 2036. Circa 366,857 homes are implied to be needed when using the same approach for the period from 2011 to 2040.

Figure 3.2: Estimated Need to 2036 and 2040



⁴PPG Reference ID 2a-012-20190220

4. Establishing the GBBCHMA supply for 2011-2031 (and beyond)

'Falling Short' sets out general observations in respect to the supply identified in the third position statement (September 2020), and the majority of those remain relevant in respect to the Addendum, including:

- It only addresses 2011 to 2031 despite local plan reviews now looking well beyond that.
- The base date then was 31 March 2019 and more than two years had passed at the point of 'Falling Short' being published, with the Addendum having a base date of 31 March 2021 the supply data remains two years out of date.
- The supply is broken down into different categories for all 14 authorities, however the raw data underpinning this is not provided as part of the Addendum, or any previous position statement.
- The supply data has not been independently examined.
- The supply is 'unadjusted' as it does not apply the standardised non-implementation discount rates from the SGS which provided a consistent approach across the HMA. Instead, only local discount rates are applied so several authorities do not apply any discounts for non-delivery (Birmingham, Bromsgrove, Redditch and Stratford).

The 14 authorities' agreed position in respect to the extent of the total supply across the entire GBBCHMA between 2011 and 2031 is **205,926 homes**, as presented at paragraph 3 of the Addendum. The Addendum has a base date of 31 March 2021 and includes all completions up to that point. This represents a total shortfall of 2,053 homes, a significant reduction from 6,302 homes as of 31 March 2020 (as presented in the December 2020 Addendum to the third position statement). Paragraph 3 of the Addendum states that Birmingham is responsible for the majority of the additional capacity identified.

More than two years have passed since then, the Addendum therefore does not reflect any housing completions or additional supply which has come forward in the intervening period. This report therefore seeks to assess the GBBCHMA's supply based on the most up-to-date evidence available.

Method of analysis

A critical factor in any analysis of the shortfall position across the GBBCHMA is an accurate position of the HMA's overall supply.

To understand the 14 authorities' current supply positions this report has reviewed in detail all the most up-to-date evidence, which is summarised in Table 4.1 below.

Table 4.1: Source of evidence for completion and supply data

Authority	Most up-to-date evidence	Base date
Birmingham	2020 SHLAA (March 2022) and Five Year Housing Land Supply Statement 2023-2028	31 March 2023
Bromsgrove	Housing Land Supply in Bromsgrove 2011-2022 (April 2023)	31 March 2023
Cannock Chase	Authority Monitoring Report 2021-22 (undated)	31 March 2021
Dudley	SHLAA 2021/22 Update (undated)	31 March 2022
Lichfield	Five Year Housing Land Supply 2023 (July 2023)	31 March 2023
North Warwickshire	Annual Monitoring Report Up to 31 March 2022 (November 2023)	31 March 2022
Redditch	Housing Land Supply in Redditch 2011-2022 (April 2023)	31 March 2023
Sandwell	SHLAA and 5 Year Housing Land Supply Update as of April 2022 (October 2023)	31 March 2022
Solihull	Examination of Solihull Local Plan – Housing Trajectory and Five Year Housing Land Supply (December 2021) / Draft SHELAA Update 2020 (October 2020)	31 March 2021
South Staffordshire	Housing Monitoring and Five Year Housing Land Supply 2022-2023 (December 2023)	31 March 2023
Stratford	Authority Monitoring Report 2021-22 (December 2022), SHLAA and Five Year Housing Land Supply report Update March 2023	31 March 2023
Tamworth	Draft Housing Delivery Paper (December 2023)	31 March 2023
Walsall	Strategic Housing Land Assessment and Statement of Housing Land Supply 2022 (undated)	31 March 2022
Wolverhampton	SHLAA 2022 (September 2023)	31 March 2022



The majority of the GBBCHMA authorities' most up-to-date evidence available is prepared on the basis of a 31 March 2022 base date, though there are a few exceptions where it is based on an older base date of 31 March 2021 (i.e. Birmingham, Solihull, and Stratford).

This report's independent assessment of the supply position across the GBBCHMA is on the basis of a **31 March 2023 base date**. To complement the 14 authorities' most up-to-date evidence this report uses the DLUHC's net additional dwellings by LPA table (table 122)⁵ so that it reflects the most up-to-date data for completions for 2022-23 (i.e. up to 31 March 2023), and for those authorities who only provide completion data for 2020-21 (i.e. up to 31 March 2021).

As part of this exercise, all 14 authorities were contacted to confirm the data that was used to inform the addendum and the most-up-date source of evidence in respect to housing supply.

Supply position

Based on the above methodology, the most up-to-date evidence demonstrates that the total supply across the GBBCHMA between 2011 and 2031 is **199,992 homes**.

As per paragraph 4 of the Addendum, the Coventry and Warwickshire Housing Market Area (CWHMA) Memorandum of Understanding assumes that a total of 2,880 homes from North Warwickshire and Stratford are to contribute to that HMA's unmet needs. Reflecting the Addendum's approach, the report therefore adds this contribution to the minimum housing requirement, when quantifying the housing need at section 5.

This is even before interrogating the components of supply which make up each authorities' supply. For instance, Birmingham has assumed that the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site. It also does not include a standardised non-implementation discount rate, therefore the individual supply position for at least four of the authorities does not factor in any non-implementation discount.

Reflecting the above, the supply position of **199,992 homes** can therefore be assumed to be a 'best case' scenario.



⁵DLUHC Live tables on housing supply: net additional dwellings by LPA (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>)

5. Quantifying the unmet need to 2031 (and beyond)

Having presented the most up-to-date scenarios in terms of the HMA's needs at section 3 and supply at section 4, this section quantifies the true scale of the HMA's unmet need between 2011 and 2031.

Addendum shortfall position

Set out in Table 5.1 below is the shortfall position based on the Addendum's claimed supply of **205,926 homes**.

Table 5.1: Scale of GBBCHMA shortfall based on Addendum claimed supply

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Addendum claimed supply	205,926	205,926	205,926
Scale of shortfall	2,053	18,184	34,742

Using a base date of 31 March 2021 and not seeking to interrogate the data presented in the Addendum, the claimed shortfall is 2,053 homes based on the SGS baseline.

The Addendum however fails to fully acknowledge that circumstances have changed since the SGS was published with the introduction of the standard method. The starting point for calculating unmet need should therefore be based on using the standard method to calculate housing need from the base date of 31 March 2021.

When applying the then-outcome of the standard method from the base date, the shortfall is 18,184 homes. If the current standard method were to be applied from the current base date of 31 March 2023, the approach advocated by this report for the reasons set out at Section 3, the shortfall is 34,742 homes.

As national planning policy and guidance is clear that standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position alone, the shortfall position across the GBBCHMA stands at 34,742 homes.

Turley shortfall position

The Addendum was based on data with a 31 March 2021 base date. As discussed earlier there is now more up-to-date evidence for the majority of authorities in terms of both completions and proposed supply, as well as national completion data.

Section 4 of this report has therefore calculated a total supply position using a base date of 31 March 2023. Table 5.2 below sets out the Turley supply position against the different need positions.

Table 5.2: Scale of GBBCHMA shortfall based on Turley supply position

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards (Turley advocated approach)
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Turley supply	199,992	199,992	199,992
Scale of shortfall	7,987	24,118	40,676

Using the most up to date base date, following the Addendum's approach of using the SGS baseline housing need figure, the shortfall is **7,897 homes** across the HMA up to 2031.

Reflecting national planning policy and guidance, the housing need scenarios which incorporate the standard method should be used as a starting point for calculating the HMA's unmet needs, in particular the scenario which uses the current outcome of the standard method from 2023 onwards. When these are applied the shortfall ranges between **24,118** and **40,676 homes**.

The above assumes the supply data in each authorities' evidence base documents is accurate. Given the minimum shortfall position on the council's and government evidence alone is significant, it is not necessary to further interrogate in detail the components of supply. However, a review of the evidence base documents demonstrates that some sites included in supplies do not meet the definition of deliverable for reasons such as still being in another use.

Ambitious delivery rates which are unlikely to be met have also been assumed for some sites. Indeed it has been assumed the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site.

Conclusions on unmet need to 2031

The above analysis reveals that there remains a significant unmet need across the HMA to 2031 with the window to deliver this continuing to narrow.

The 14 authorities should be planning positively to deliver the most recent standard method need and ensuring the unmet need of **40,676 homes** up to 2031 as reflected in the most up-to-date evidence is accommodated in full through emerging local plans.

Looking ahead – an indication of the shortfall to 2036 and 2040

As with 'Falling Short', it is difficult to accurately quantify the unmet needs beyond 2031 because there remains an incomplete picture in terms of the HMA's housing supply beyond this date. This report provides an indication of the potential scale of unmet need between 2011 and 2036, and 2011 and 2040, based on each authorities' most up-to-date evidence.

From reviewing the data it is clear there is no supply information for the majority of authorities post 2031. This report has therefore taken the same approach as 'Falling Short' and therefore sought to extrapolate the Addendum and Turley supply position by annualising the supply figure (10,296 homes and 10,000 homes, respectively rounded up) and applying the annual figure each year beyond 2031.

This has been tested against the 2036 and 2040 need positions which use the standard method from 2023 onwards, the approach this report advocates as presented at section 3.

This approach is relatively simplistic and crude and it is arguable as to whether the urban areas can continue to deliver at rates similar to 2011-2031 and how any changes to national planning policy may impact this. It however provides a useful indicator as to the potential scale of the shortfall post-2031, as summarised below.

Table 5.3: Scale of GBBCHMA shortfall up to 2036 and 2040

	Need to 2036	Need to 2040
Need	309,493	366,857
Need with CWHMA contribution	312,373	369,737
Addendum claimed supply (extrapolated)	257,400	298,584
Shortfall against claimed Addendum supply	54,973	71,153
Turley supply (extrapolated)	250,000	290,000
Shortfall against Turley supply	62,373	79,737

As referred to above, this exercise provides the likely direction of travel in terms of unmet need across the HMA, which will likely be established via emerging local plans with unmet need, such as Birmingham.

6. Conclusions and recommendations

The 14 Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') authorities published in October 2023 (dated April 2023) their updated Position Statement Addendum ('the Addendum'). The headline conclusion was that, as of 31 March 2021, the 2011 to 2031 shortfall across the GBBCHMA is estimated to be 2,053 homes.

In response this report has been commissioned by a consortium of housebuilders and promoters to provide an updated position to the Turley 'Falling Short' report (August 2021) to take stock of the position in order to quantify the true scale of unmet to 2031, and beyond.

As with 'Falling Short', this report has focused on 2011 to 2031 as the timeframe covered by the Addendum. The report has however looked beyond 2031 in high-level terms given emerging plans across the GBBCHMA will go well beyond 2031.

The Addendum, published in October 2023, claims the GBBCHMA's shortfall arising between 2011 to 2031 has now reduced to 2,053 homes. This is however predicated on a base date of 31 March 2021, nearly three years ago. In that time, there is now additional monitoring data, and updated supply positions from the majority of GBBCHMA authorities, which has not been reflected in the Addendum's findings.

Furthermore, the Addendum continues to reference a need for **205,099 homes** over the period from 2011 to 2031, based on the Greater Birmingham HMA Strategic Growth Study (2018) that is increasingly dated having been produced almost eight years ago.

The standard method has since been introduced, offering the consistency that the SGS itself sought to provide. While this cannot be backdated to 2011, it can be reasonably used in place of the SGS scenario as an indicator of future needs.

Applying it from the base date of the Addendum (31 March 2021) suggests that some **221,230 homes** are needed between 2011 and 2031 but this rises to **237,788** when the current outcome is used from 31 March 2023 onwards, allowing for worsening affordability and the removal of the cap for Birmingham. This approach, which best reflects national policy, indicates that some 309,492 homes are needed over the longer period from 2011 to 2036, with 366,857 needed to 2040.

As national planning policy and guidance is clear that the standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position, the shortfall position across the GBBCHMA stands at **34,742 homes**. Based on the Turley supply this shortfall increases to **40,676 homes**. This is the scale of unmet need that best represents the most up-to-date evidence. This shortfall increases to **62,373 homes** up to 2036, and **79,737 homes** up to 2040, when extrapolating the available supply data.

As required by the duty to cooperate it is critical that this quantified unmet need up to 2031 should be distributed between emerging local plans and delivered. This will require difficult decisions, including reviewing Green Belt boundaries.

As suggested in 'Falling Short', it remains the case that a strategic plan or framework is required to cover long term growth across the GBBCHMA, potentially to 2040 and beyond.



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