

BIRMINGHAM DEVELOPMENT PLAN EXAMINATION 2014

MATTER E: GREEN BELT POLICY & THE LANGLEY SUE

STATEMENT BY SAVILLS ON BEHALF OF TAYLOR WIMPEY

SEPTEMBER 2014

Question 1. Does policy TP10 set out an appropriate approach to the management of the Green Belt?

1. Taylor Wimpey supports the removal of the Langley SUE (Area C) from the Green Belt, in accordance with the revised Green Belt boundaries shown on the Policies Map, for allocation for a residential urban extension. Taylor Wimpey is part of the Langley SUE Consortium and has made general comments separately to Question 1 as part of the Langley SUE Consortium's response.
2. Taylor Wimpey questions whether the Green Wedges identified in Policy TP10 truly perform a Green Belt function when assessed against the five purposes of including land in the Green Belt set out in NPPF paragraph 80 and therefore whether it is appropriate to include them all in the Green Belt.
3. Taylor Wimpey has an interest in c.40ha of the southern end of the Langley SUE. If the 40ha 'substantial green corridor' green infrastructure link proposed for the Langley SUE in Policy GA5 comes forward, either as a single east-west corridor to the north of the Taylor Wimpey land (shared infrastructure) or as part of an interlinked network running through and around the Taylor Wimpey land (site-specific infrastructure), Taylor Wimpey considers that this should not be designated as a Green Wedge in the Green Belt, on the basis that either approach is not considered to meet the five purposes of Green Belt identified in the NPPF.

Question 2. Do exceptional circumstances exist which justify an alteration to the Green Belt boundary to accommodate 6,000 dwellings?

4. Birmingham City Council (BCC) accepts that not all of its objectively assessed housing need can be accommodated in the existing urban area, as informed by the 2013 Birmingham SHLAA, and therefore that it needs to look to Green Belt within its administrative boundary to seek to accommodate more of its need because the only remaining 'non-urban' land within its administrative boundary is in the Green Belt. Taylor Wimpey notes that BCC states at paragraph 5.67 of the Plan that it considers that this set of circumstances provides justification for 'exceptional circumstances'.
5. Taylor Wimpey also recognises that Birmingham has no 'countryside' which it could look to for development in advance of considering Green Belt release and that the non-urban land on the edge of the Birmingham administrative boundary in adjoining local authorities is also in the Green Belt. Therefore, on a housing need basis Taylor Wimpey considers that exceptional circumstances exist to justify looking at releasing land from the Green Belt within the Birmingham administrative boundary.
6. The Birmingham Development Plan 2031 Green Belt Assessment (October 2013) responds to the NPPF paragraph 83 requirement for LPAs to review Green Belt boundaries "*having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*". In Section 5.5 of the Green Belt Assessment (October 2013), Area C, when considered in isolation, scores the highest out of all the Green Belt areas reviewed for residential development, both in terms of accordance with the Green Belt tests for 'sprawl', 'merger' and 'encroachment' (score of 8/9) and in overall terms against all of the assessment criteria (score of 28/33). The release of Area D (Peddimore) for employment development to the east, subject to this site being found 'sound' through the Examination, will further reduce the case for Area C performing a Green Belt function and further reduce the impact of residential development in Area C on the landscape.

7. Area C (The Langley SUE) is well-related to the existing urban area, including existing transport, retail, community, employment and other infrastructure. Green Belt release in this area represents a logical expansion of the urban area, in accordance with the need to promote sustainable patterns of development (NPPF paragraph 84).
8. The Langley SUE can also deliver the following additional benefits: social benefits through delivering a significant choice of new housing, including family housing and affordable housing, new community, educational, open space and sporting facilities; economic benefits through the construction of housing, support to the vitality of both the local and City Centres and support to the wider economic growth of Birmingham by providing housing for the expanding workforce; and environmental benefits through delivering housing in a sustainable well-connected location and opportunities for enhanced biodiversity.
9. Taylor Wimpey therefore considers that exceptional circumstances do exist for the release of land in Area C (The Langley SUE) for 6,000 dwellings based on the need for housing and the Green Belt evidence base accompanying the Plan.

Question 4.a) Is there adequate justification, including Sustainability Appraisal and assessment of the transport, education, health, drainage, sewerage and other infrastructure implications, for the selection of Green Belt “Area C” to accommodate Langley SUE?

10. Taylor Wimpey is part of the Langley SUE Consortium and has made general comments separately to Question 1 as part of the Langley SUE Consortium’s response.
11. In terms of potential constraints to residential development, both in isolation and in the context of other Green Belt parcels assessed for residential development, Taylor Wimpey considers that BCC’s evidence base, notably through the assessments set out in paragraphs 4.5.2 and 5.5.3 of the Green Belt Assessment (October 2013), in addition to the Langley SUE infrastructure requirements identified within the Infrastructure Delivery Plan (October 2013), Site Delivery Plan (October 2013), support the selection of Green Belt Area C to accommodate the Langley SUE.

12. Taylor Wimpey also wishes to highlight that paragraph 5.4.3 of the Submission Plan Sustainability Appraisal (June 2014) acknowledges that the overall sustainability effects in relation to the Langley SUE allocation (Policy GA5) are likely to be positive in the context of creating a mixed use development which responds to the housing needs of the City which cannot be realistically met in the built-up area and which encourages self-containment and provision of green infrastructure enhancements.
13. Taylor Wimpey has an interest in c.40ha of the southern end of the Langley SUE. Taylor Wimpey submitted site-specific baseline technical studies to the Green Belt Options consultation stage of the Plan in 2013, which demonstrated that the Taylor Wimpey land, as well as a parcel of land to the south east owned by BCC and land immediately to the north owned by William Davis could be developed for residential development without significant highway, flood risk / drainage, archaeology, noise, ecology, landscape or air quality constraints.
14. These findings are consistent with the BCC evidence base assessments for this area set out in the Birmingham Green Belt Assessment (October 2031), notably in relation to archaeology (page 59 – low sensitivity), landscape (page 61 – low sensitivity), ecology (page 63 - majority low sensitivity).
15. The southern area of the Langley SUE is considered to be self-contained and would represent a logical first phase of development for the Langley SUE, on the basis that it: i) abuts the existing urban area on 2 sides; ii) is in close proximity to the existing Walmley services and facilities; iii) would benefit early from the proposed new A38 roundabout BCC is planning on its land in the south eastern corner of the SUE; iv) is of a size that could deliver primary education and other community facilities as part of the development; and v) is largely free from technical constraints. The combination of these factors and the additional benefits stemming from national housebuilder and BCC land interests is considered to be able to facilitate early delivery on the site, in accordance with the wider site-wide masterplan being progressed, without large up-front infrastructure costs, and which can therefore enable funds to be released to facilitate delivery within the remainder of the SUE.

16. Taylor Wimpey considers that the benefits that can be achieved from this early phasing approach provides further justification for the selection of Area C to accommodate the Langley SUE.

Question 4.b) Is the SUE deliverable within the expected timescale?

17. As stated in the response to Question 4a) Taylor Wimpey, as a national housebuilder with a significant land interest at the southern end of the Langley SUE can play an important role in enabling the early delivery of housing in the SUE and assist with 'unlocking' and facilitating delivery on the remainder of the SUE within the anticipated timescales. Taylor Wimpey anticipates being able to deliver housing in the Langley SUE within the next 5 years.
18. Taylor Wimpey is part of the Langley SUE Consortium of landowners and promoters, who together control or represent the majority of the SUE and who are all working together to actively promote the SUE and ensure that the SUE and infrastructure requirements can be delivered.

Question 5. Is there adequate justification for all the requirements of policy GA5, including preparation of a Supplementary Planning Document?

19. Taylor Wimpey is part of the Langley SUE Consortium and has made general comments separately to Question 5 as part of the Langley SUE Consortium's response.

GA5 Requirements

20. Policy GA5 should include a reference to development taking place at the Langley SUE 'at an appropriate density', in accordance with the flexibility sought for design policies through paragraph 59 of the NPPF and to take account of 'market signals' (Planning Practice Guidance ID 2a-019-20140306 and NPPF paragraph 158).
21. Taylor Wimpey does not consider that the June 2014 BCC response in relation to Langley SUE density comments sufficiently addresses the concerns raised in the representations Taylor Wimpey submitted to the Plan Pre-Submission consultation document. Whilst the 2013

SHLAA, applies the densities proposed in the Plan (policy TP29) to all sites considered in the SHLAA, generally at 40dph outside the City Centre, Taylor Wimpey notes that many of the recent detailed planning permissions in Birmingham which have achieved densities of 40dph or higher outside the City Centre have been generally small scale previously-developed sites and often included flats.

22. Taylor Wimpey still considers that a requirement to apply an average density of 40dph across the Langley SUE based on Policy TP29 to maximise land use and development potential would not be appropriate and would be contrary to the Policy GA5 focus on the provision of family housing. Furthermore, Taylor Wimpey invites the Inspector to view the existing residential areas in the vicinity of the Langley SUE in terms of density, character and housing typologies. This will demonstrate that the established Sutton Coldfield / Walmley mature suburbs area has been developed at an average density of less than 40dph.
23. A delivery requirement based on 40dph on the Langley SUE would also be contrary to paragraph 2.10 of the PBA Housing Delivery on Green Belt Options evidence base document (January 2013), which identifies that 40dph is a maximum density and that most developers are seeking lower densities on greenfield sites, often down to 32dph. This accords with 'exemplar' urban extensions which have been delivered in recent years, such as Newcastle Great Park (35dph), Poundbury (34dph) and Hampton, Peterborough (35dph).
24. BCC has not responded to the Taylor Wimpey's previous concerns relating to the requirement for the "*highest standards of sustainability and design*", for "*development layout, buildings and open spaces to be designed to the highest possible standards*" and for "*development to achieve the highest standards of sustainability including the use of low carbon energy generating technologies such as combined heat and power*" in its July 2014 response to comments on Policy GA5. Taylor Wimpey still considers that these requirements are not objective and are not achievable and consequently should be amended to read "*high standards*" to balance BCC's aspirations with development viability.
25. Taylor Wimpey is firm in its commitment to sustainability and where possible and viable, seeks to integrate sustainability into its developments to encourage or support community,

environmental sustainability and economic vitality. Taylor Wimpey has extensive experience in delivering renewable energy solutions. Taylor Wimpey also seeks to integrate water saving features into developments, encourage recycling, participate in community and homeowner engagement, protect heritage, create jobs and provide open spaces and wildlife areas.

26. BCC has not responded to Taylor Wimpey's previous concerns relating to the requirement for a 40ha Country Park in its July 2014 response to comments on Policy GA5. Taylor Wimpey recognises the importance of green infrastructure within the SUE, but still considers that the Plan requirement for "*a substantial green corridor of at least 40ha connecting New Hall Valley Country Park to the wider Green Belt beyond the A38*" in Policy GA5 has not been justified. Taylor Wimpey is still keen to liaise with BCC prior to Examination and through the masterplanning process to seek to understand the justification for the corridor, proposals for spatial delivery and overlap with general public open space requirements.

Supplementary Planning Document (SPD)

27. Taylor Wimpey, as part of the Langley SUE Consortium, has agreed to work collaboratively with BCC on the production of the masterplanning documents to enable the delivery of a comprehensive and sustainable urban extension. Taylor Wimpey welcomes the response that the Langley SUE Consortium received from BCC confirming that engagement with landowners and developers is a key component of the masterplanning. However, Taylor Wimpey stresses the importance of the need for ongoing and meaningful input from all Consortium members to ensure that the masterplan is deliverable and phased appropriately.
28. Taylor Wimpey, in conjunction with the other Members of the Langley SUE Consortium, is concerned about the timescales and justification for an SPD, on the basis that it now understands that the masterplan will form the basis of an SPD, rather than represent a stand-alone document. Taylor Wimpey is still concerned that the production of an SPD will be overly prescriptive and will cause unnecessary delay to the delivery of development. Early delivery on the SUE could enable a proportion of development on the SUE to be counted within BCC's housing supply for the next 5 years.

Question 8. Do exceptional circumstances exist which justify further alterations to the Green Belt boundary to release additional land for housing and / or employment development, either within the Plan period or as safeguarded land for development beyond the Plan period?

29. Whilst the full objectively-assessed housing need for Birmingham is not yet known, the evidence that has been produced to date suggests that the need will be in excess of the 51,100 homes being proposed within the Plan (including the 6,000 homes in the Langley SUE) and therefore there is still a housing need case for considering further residential development in the Green Belt within the Birmingham administrative boundary.
30. However Taylor Wimpey stresses that, on the grounds that the Langley SUE would deliver a sustainable form of development as a logical urban extension to Birmingham, in the area of Green Belt achieving the most favourable score in the Green Belt Assessment (October 2013), that any further Green Belt release to meet the housing needs of Birmingham is in addition to, rather than instead of, the Langley SUE.

Question 9.a) If additional housing or employment land is required, or the selection of the Langley SUE / Peddimore site(s) is found not to be justified, is there justification, including SA, to release other specific area(s) of Green Belt for development?

31. Taylor Wimpey is not aware of any constraints that would prevent the selection of the Langley SUE from being found to be unjustified. If additional housing land is required, Taylor Wimpey considers that there could also be potential to deliver residential development in the Green Belt in Area B, to the north of the Langley SUE, and potentially also in part of Area A, on market grounds, as identified in the Savills Final Report 'Birmingham Strategic Growth Review' (march 2014).