

Birmingham Development Plan 2031
Examination Hearing Statement on behalf of
Richborough Estates

Matter E: Green Belt policy, the
Langley SUE allocation and the
Peddimore employment allocation
(BDP policies TP10 & GA5-6)

September 2014

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LPA reference

Birmingham Development Plan 2031 Examination

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Executive Summary

1. This hearing statement is submitted by Turley on behalf of Richborough Estates in respect of their objections to the Birmingham Development Plan 2031 with reference to land at Fox Hill, Roughley.
2. It addresses Matter E: Green Belt policy, the Langley SUE allocation and the Peddimore employment allocation (BDP policies TP10 & GA5-6) due to be heard on Tuesday 28 and Wednesday 29 October (Days 4 and 5).
3. The statement is set out as a response to the Inspector's Issues and Questions for Discussion as set out in the Programme for Hearing Sessions (version 1) dated 20 August 2014.

Main Issue: Does the plan comply with national policy in its approach to the Green Belt? Are the Langley SUE and Peddimore employment allocations justified and deliverable? Should other Green Belt and/or major greenfield allocations be made?

4. Once the Council determined that exceptional circumstances existed and decided to review its Green Belt Boundary in order to help meet its housing needs, it failed to undertake an appropriate assessment of Green Belt and, consequently, its sustainability appraisal was flawed as a result.
5. It is required to determine the extent of Green Belt alteration and define a boundary that is defensible in the long term in accordance with NPPF paras 83-85. This is not a case where the Council is unwilling to release Green Belt land for development, so the matter at hand is whether enough land has been released to maximise housing delivery within the plan period.
6. In addition to the Langley and Peddimore allocations, Richborough Estates considers that another major allocation should be made on land currently designated as Green Belt (referred to in the 2012 Options Consultation as Area B) to maximise the delivery of housing within the city's boundary (see our submissions on Matters A and F). This area can accommodate up to another 5,000 dwellings.
7. This can be justified and delivered within the plan period. There is as much certainty that development of this land can be achieved before 2031 as there is of land which has yet to be quantified, then identified in other LPA areas, much of which will be currently designated Green Belt and will have to go through Green Belt and Local Plan review before it can be delivered, as envisaged by the Council's mechanism for meeting unmet needs.
8. Even if the Inspector considers that delivery within the plan period is unlikely to be achieved, the land should be removed from the Green Belt and safeguarded to meet longer term development needs in accordance with NPPF para 85.

1. Q1

1.1 No response.

2. Q2: Do exceptional circumstances exist which justify an alteration to the Green Belt boundary to accommodate 6,000 new dwellings?

- 2.1 We agree that 'exceptional circumstances' exist to justify alteration of the Green Belt. Para 83 of the NPPF makes clear that this can only be through review of a local plan, having regard to the "intended permanence" of Green Belt in the long term. Once a decision has been made to review Green Belt, this must look beyond the plan period.
- 2.2 The Council's position is that it cannot meet all of its housing needs within the existing urban area, but the BDP states at para 3.27 that:

"The strategy of the BDP is to accommodate as much of the City's housing requirement as possible within the boundary." (our underlining)
- 2.3 The Council undertook a review of Green Belt options (2012) and determined that exceptional circumstances existed to remove land to meet development needs in the Sutton Coldfield area.
- 2.4 The difference between us is the scale of the housing need and how much can be met within the city. The altered boundary should also be "capable of enduring" (in NPPF terms) beyond the plan period.
- 2.5 The Langleigh SUE can accommodate 6,000 dwellings, with 5,000 during the plan period, and 1,000 safeguarded for longer term needs. This is important as it recognises the need for safeguarding beyond the plan period.
- 2.6 The BDP proposes 51,000 dwellings in Birmingham to meet a 'need' of 84,000 (61% of the total). If, as expected, the full objectively assessed need is greater (our Matter A submission suggests c111-112,000), the proportion met within the city falls below 50%.
- 2.7 If the full need is greater than anticipated, there must be a reconsideration of the means by which it will be met. It is not enough to simply say that the city is "full".
- 2.8 We set out in Q8 and Q9 that exceptional circumstances exist to remove Areas A and B in addition to Area C and that the development of up to 10,000 dwellings on Areas B and C can be delivered within the plan period.
- 2.9 This would still leave between 33-50% of the city's housing needs to be met outside the plan boundary, and much of that will require Green Belt release in adjoining districts, for which exceptional circumstances will also need to be shown in due course.
- 2.10 The Council's own Technical Note and SA of the submission BDP (Amec, June 2014) also states:

There are significant uncertainties over the likely sustainability implications of accommodating around 30,000 dwellings in surrounding authorities.

- 2.11 If the shortfall is nearer 60,000 (based on the higher OAN), this becomes even more significant and the need to maximise what Birmingham can accommodate even more important.
- 2.12 In respect of NPPF para 83 and the intended permanence of Green Belts, we believe there is no reason why Areas A to C cannot be released from Green Belt to ensure the boundary is “capable of enduring beyond the plan period”. The Council has identified capacity for 1,000 dwellings to be safeguarded post 2031 but has provided no evidence why this is sufficient to meet the NPPF’s requirements for permanence.

3. Q3

3.1 No response

4. Q4 a) is there adequate justification, including Sustainability Appraisal ...for the selection of Green Belt 'Area C' to accommodate the Langley SUE?

- 4.1 Our March 2014 representations make the case that Area B is of equal merit to Area C from a Green Belt and sustainability perspective and therefore should also be removed to accommodate a SUE.
- 4.2 By implication, we consider there is adequate justification for Area C. We address the justification, including SA, for Area B under Q9 below.

Q4 b) Is the SUE deliverable within the expected timescale?

- 4.3 We consider that more housing can be delivered within the plan period than is proposed at the Langley SUE. This is addressed in relation to Q9 below.

5. Q5: Is there adequate justification for all the requirements of policy GA5, including preparation of SPD?

- 5.1 Richborough Estates supports the requirements of GA5 and believes the addition of Area B would make a positive contribution to the development of an exemplar SUE on the edge of Birmingham.

6. Q6

6.1 No response

7. Q7

7.1 No response.

8. Q8: Do exceptional circumstances exist which justify further alterations to the Green Belt boundary to release additional land for housing ..., either within the plan period or as safeguarded land beyond the plan period?

8.1 We consider exceptional circumstances do exist in accordance with NPPF paras 83-85 to further alter the Green Belt boundary to release additional land for housing.

8.2 This is justified because:

- The full objectively assessed need for housing is greater than the BDP currently identifies and therefore the Council's search for a 5,000 capacity single SUE location is not the only reasonable alternative to be considered
- The Council's Green Belt Assessment is flawed and LDA's own analysis (in our March 2014 representations) shows that Areas B and C are equally well suited in Green Belt terms to the creation of a residential urban extension which can be well integrated to the urban area and define a new and defensible urban edge.
- The Council's response to comments on Langley and Green Belt (June 2014) simply asserts that its assessment is based on NPPF policies and states that Areas A and B were considered, but they contribute to the purpose and function of the Green Belt and are "more sensitive" to development. LDA's assessment is much more thorough and has not been adequately rebutted.

8.3 The Council's only real defence appears to be based on housing delivery, hence the supplementary report by PBA/HDH in response to Savills report in our March 2014 appendices. This is addressed in Q9(b) below.

8.4 Even if the Inspector considers that the delivery of this much housing over the plan period cannot be achieved, there is justification (and hence exceptional circumstances) for removing this land from the Green Belt as there will be a need beyond 2031 to provide more land for housing. To maximise the effectiveness of plan-making, now is the time to alter the Green Belt boundary for the long term and safeguard additional land to meet future development needs.

8.5 This would be consistent with NPPF para 84 which says LPAs should take account of the need to promote sustainable patterns of development and consider the "*consequences of channelling development towards urban areas inside the Green Belt boundary....or towards locations beyond the outer boundary*". The BDP makes no assessment of the consequences of exporting its need beyond its boundaries and therefore cannot be confident that this is a more sustainable approach than accommodating more within its boundaries.

9. Q9a) If additional housing or employment land is required ..., is there justification, including SA, to release other specific area(s) of Green Belt for development?

- 9.1 We believe there is strong justification from a sustainability perspective to release Area B, in addition to Area C, from the Green Belt for residential development.
- 9.2 Robust evidence was submitted in our previous representations demonstrating that the SA is unsound and has incorrectly assessed Area B as a sustainable, additional option to meet housing need. Following our own detailed reappraisal and correction of reporting errors, we demonstrated that Area B is just as sustainable as C when assessed against the SA framework, and therefore development of **both** would present the most sustainable option.
- 9.3 The Council's response to our representations does not rebut this statement, but refers to their Green Belt Assessment as further evidence to justify the SA conclusions. Our March 2014 representations demonstrated deficiencies in the Green Belt Assessment, showing it to be unsound thereby further weakening the SA conclusions.
- 9.4 The release of Areas B and C would provide approximately 9-10,000 dwellings within the city, thereby reducing the quantum needed in adjoining authorities. This would be a more sustainable option by locating more dwellings closer to places of work, services and facilities (as shown in Savills Statement at Appendix 1) thereby reducing transport journeys and carbon emissions and improving local air quality; and is fully supported by NPPF paras 30, 37 and 95. Furthermore, it would support policies TP1 (Reducing the City's Carbon Footprint) and TP2 (Adapting to Climate Change) of the BDP.
- 9.5 Given that the preparation of a Sustainability Appraisal incorporating the requirements of the SEA Directive is a legal requirement for the adoption of a sound development plan, a reassessment of the reasonable alternatives available must be undertaken, which, based on our evidence and a lack of rebuttal from BCC, would demonstrate that para 5.60 of the pre-submission BDP is unsound in its current form.
- 9.6 In our view, the release of further Green Belt land to accommodate up to 10,000 dwellings in the Sutton Coldfield 'arc' is justified and enjoys the same exceptional circumstances that exist for the Langley SUE, as this would still be consistent with the BDP strategy para 3.27.
- 9.7 This still acknowledges that a considerable proportion of the city's housing needs would have to be met outside the plan boundary, and almost certainly a high proportion of that will require Green Belt release in adjoining districts, for which exceptional circumstances will also need to be shown in due course.

- 9.8 If the shortfall is nearer 60,000 (based on the higher OAN), this becomes even more significant and the need to maximise what Birmingham can accommodate even more important.

Q9b) Would the development of the other area(s)/major greenfield site(s) be achievable within the plan period?

- 9.9 Richborough Estates and the Gilmour Family control all of Area B. Other housebuilders involved in Area C have not raised objection to the release of Area B and, indeed, have lent support through letters appended to our March 2014 representations.
- 9.10 The Council has supplemented its response on housing delivery on Green Belt options with the commissioning of further research by PBA/HDH to respond to Savills report (in our March 2014 representations). As this was only made available in August, Savills have prepared an additional statement appended at Appendix 1.
- 9.11 LDA has given further consideration to how the NE arc could be developed based on a detailed understanding of local circumstances. This material is presented graphically on three plans which supplement the material in our March 2014 representations. They are included in the Savills Statement at Appendix 1 and comprise:
- Figure 13 - Access to Social Infrastructure. This illustrates integration of the existing and proposed social infrastructure, identifying existing and proposed schools to serve the proposed communities, and local centres serving both existing and new communities. Existing main highway network is highlighted to identify main routes between Sutton Coldfield and the NE arc.
 - Figure 14 - Access to Green Infrastructure. This illustrates areas of existing strategic and public open space, and connections with proposed strategic and public open space as part of the LDA Development Framework. It demonstrates how the green infrastructure benefits the whole area and creates a well-planned edge to the urban area and wider countryside beyond.
 - Figure 15 – Phasing. This illustrates three potential phases for the development of the NE arc. The phasing enables the expansion of existing communities, with the proposed development relating to the overall character and market of the existing adjacent urban edge. The varying phases will also offer different benefits to the adjacent communities, for example through the provision of primary and secondary schools, local centres and open space.
- 9.12 Given their local knowledge and using LDA's development framework, Savills have identified how the delivery of both Areas B and C could be achieved over the plan period including a number of outlets, building on the social facilities and green infrastructure identified by LDA.
- 9.13 We invite the Inspector to undertake a detailed site visit of these locations so that he can appreciate the diverse nature of the local communities in this part of the city and examine the development principles set out in our representations. It will be apparent that it is not appropriate to view this area (6.2 miles north to south) as a single SUE location. Nor is it appropriate to apply academic analysis of SUE performance from

around the country. What is required is a Birmingham-based solution to a Birmingham problem using local knowledge and a thorough understanding of the local context.

- 9.14 The deliverability of SUEs also needs to be considered in the context of how the inevitable shortfall is to be met outside Birmingham. It is likely that a number of neighbouring authorities will rely at least in part on SUEs removed from their Green Belt following local plan review to accommodate Birmingham's need. Given the timescales involved in undertaking local plan review and then the lead-in times for delivery of SUEs, there are significant uncertainties that enough will be delivered by 2031 and therefore the BDP's reliance on other LPAs may not be the most effective strategy, i.e. one that is deliverable over Birmingham's plan period.

Q9c) or should it/they be safeguarded for development beyond the plan period?

- 9.15 LDA's work in our March 2014 representations shows that that there is no justified reason why the 2012 Option Areas A to C could not be released from the Green Belt to ensure the boundary is "capable of enduring beyond the plan period". The Council has identified capacity for only 1,000 dwellings to be safeguarded post 2031 but has provided no evidence why this is sufficient to meet the NPPF's requirements having regard to permanence. We believe that Area B can be delivered within the plan period, but if the Inspector is convinced otherwise, we still consider that Area B should be removed from the Green Belt and safeguarded for development beyond the plan period.

Appendix 1: Savills Statement on Sutton Coldfield Green Belt Sites

Dated September 2014

Birmingham Development Plan - Sutton Coldfield Green Belt Sites

Savills Statement

September 2014



Order of Statement:

1. Birmingham City Council's (BCC) housing offer challenge.
2. Sutton Coldfield's part in the solution.
3. Potential of the North East Arc.
4. Observations on and response to the PBA Phase 2 Report of Study (June 2014).
5. Conclusion.

Appendices

- 1) Key Experience of Savills
- 2) Birmingham map of Group A – Career Professionals Living in Choicest Housing
- 3) North East Arc Adjacent Values Heat Map
- 4) Access to Social Infrastructure; Green Infrastructure; Phasing and Access Maps

Savills Statement expands upon the opinions set out in their report "Birmingham Strategic Growth Review (March 2014)". Plus, responds to points necessary for redress in PBA's report for BCC, "Sutton Coldfield Green Belt Sites, Phase 2 report of Study (June 2014)"

1. Birmingham City Council's (BCC) housing offer challenge

- 1.1 As a national and regional practice of surveyors, planners and designers involved in over 150 UK major residential developments ranging from 1,000 up to 10,000 homes and mixed uses, we believe we have the first hand commercial delivery experience, to offer credible opinions on the solutions to BCC's housing offer challenge. Appendix 1 sets out our West Midlands credentials for residential development expertise.
- 1.2 To satisfy BCC's economic growth, a full range of housing offer will be required, importantly including executive housing. Failing to deliver executive housing will jeopardise BCC's ambition to create 100,000 resilient new jobs, as the new housing stock will fail to deliver adequate quality housing types. For example for the top 200 of the 1,500 jobs locating in Birmingham for the HS2 headquarters, it is alleged each will be earning in excess of £100,000 per annum, plus the majority of the other HS2 jobs will be approaching these salary levels. Savills opinion is that the BCC Development Plan is not planning to satisfy the demands of these people and families, let alone Birmingham's existing upper end socio-economic groups. Relying on neighbouring authorities will result in delays and uncertainties, plus unsustainable long distance commuting.
- 1.3 Proposed new land supply is heavily relying on urban area sites for 45,000 SHLAA plots, at 40 dwellings per hectare (dph) and up to 100 dph in the City Centre. The sites are almost all in low value market areas. For example 20.1% are in Nechells and 18.3% in Ladywood. Only 1.9% of SHLAA sites are in BCC's high value suburb of Sutton Coldfield. Group A households are significantly under planned for.
- 1.4 GVA's CIL Economic Viability Assessment (October 2012) on behalf of BCC, identified 7 Market Value Areas. For reference GVA's Areas are:
 - Area 1 - £240 per square foot (psf)
 - Area 2 - £230 psf
 - Area 3 - £220 psf
 - Area 4 - £175 psf
 - Area 5 - £170 psf
 - Area 6 - £165 psf
 - Area 7 - £150 psf
- 1.5 Almost exclusively all the SHLAA sites are in Areas 4 to 7, the lowest value Areas. The combined 38% of SHLAA sites in Nechells and Ladywood are Areas 6 and 7. BCC's proposed housing offer is severely out of balance. 27 of the 35 GVA Market Value Areas are in Areas 4 to 7.
- 1.6 BCC's intention is to deliver a major urban extension in the vicinity of the Walmley part of the NE Arc, known as Langley being Area C. This allocation is very necessary, yet in Savills market knowledge view it is planned at to high a density and fails to satisfy the higher value market needs for Birmingham that would fall within GVA's Areas 1 and 2, as Walmley is in GVA's Area 4. Therefore there is a robust need also for Area B and the housing value and quality it can offer (see 2.7). The values heat map in **Appendix 3** shows that values adjacent to Area B are higher than to C.
- 1.7 The NE Arc is 1,200 hectares in size and has significant physical capacity for much greater delivery than BCC are planning for. This is recognised by PBA on behalf of BCC, but dispute Savills contention that the NE Arc's market capacity within the Development Plan period to 2031 is much greater than solely the Langley urban extension.
- 1.8 Savills offer in comparison, Cambridge City's growth plans. With a population of 130,000 (Birmingham is 1.074m), it is planning for four major sites ranging from 1,000 up to two sites of 10,000 homes. These sites are all within a distance of 8 miles. The extent of the NE Arc is 6 miles from the southern point up to the most northern point of Area B. This is a major land mass, one that would encompass many districts within an existing urban area.

Planned correctly Areas B and C would be complementary, each catering for different housing market needs, taking the lead from their existing adjacent districts of Sutton Coldfield. Area B would be the GVA Market Value Areas' 1 and 2 which the current Development Plan fails to satisfy the need for.

- 1.9 BCC's choice of seeking cooperation from neighbouring authorities to deliver the substantial housing shortfall is a poor alternative. It is almost certain that a similar sized urban extension, more likely several, would have to be allocated. This would take much longer than BCC allocating a second urban extension in Area B of the NE Arc. Sites would have to be identified and promoted through local plan reviews.
- 1.10 Allocating Area B enables BCC to have greater control of their destiny.
- 1.11 Furthermore the benefits of developing the much needed type of housing within Area B of the NE Arc should not be delayed just because of the stepped trajectory over the DP period (TP28). NE Arc land supply would be a very significant source of housing supply, impossible to deliver elsewhere within the City boundaries.

2. Sutton Coldfield's part in the solution

- 2.1 The Royal Borough of Sutton Coldfield has a population of circa 95,000 (2011 census). As such it is the largest district within BCC's administrative area.

Taking as a simple comparison this also makes it larger than Rugby for example with a 70,000 population. Yet Rugby has allocated 10,800 new homes in its adopted Core Strategy to 2026, including a site for 6,200 and one of 1,200 homes within 7 miles of each other. It has to be questioned why Sutton Coldfield should be assumed to only have a market capacity to plan for 1,000 SHLAA and up to 5,000 plots in the NE Arc, yet has a 35% larger population.

- 2.2 According to BCC's statistics on 'Types of Residential Areas in Birmingham', Sutton Coldfield is one of two constituencies with the highest 'Group A – Career Professionals Living in Choicest Housing'. This is illustrated in **Appendix 2**. Of the 23,000 households of this category in Birmingham, 5.6% of the total number in the city, compared to 11.7% in the West Midlands and 12.9% in England. Sutton Coldfield is one of two constituencies where the majority of these households live (**Appendix 2**).

- 2.3 Sutton Coldfield cumulatively has at least 12 schools, five railway stations, three local football clubs, major open space areas notably Sutton Park (2,400 acres) and New Hall Country Park (160 acres) and supports two local papers. The town centre has all municipal services of a large community such as town hall, rescue services, two shopping centres, train station etc. Effectively it is a town in its own right.

- 2.4 Sutton Coldfield comprises four Wards, approximately divided into seven main districts with sub-districts covering many varying markets. Counting main and sub districts there are approximately twenty seven. The seven main districts in approximate order of residential value, are:

2.4.1 Four Oaks - The most expensive residential area in the West Midlands, renowned for its exclusive Four Oaks Estate, home to some of the wealthiest people in the West Midlands. Four Oaks Estate is a solely residential area. The wider Four Oaks area has two railway stations.

2.4.2 Mere Green – includes a commercial centre, library and community facilities as part of the Four Oaks area, benefitting from close proximity to a railway station. Roughley is a sub district and is adjacent to Area B of the NE Arc. Both benefit from a high reputation.

2.4.3 Wylde Green – North west of Walmley, mainly a residential area with shopping and community facilities, plus a railway station.

2.4.4 Boldmere - well-served with shops, banks, hair dressers, pubs and restaurants, plus railway station. Five churches, four schools, theatre, golf and football sports clubs.

2.4.5 Walmley – originated in the 19th Century. Comprises large residential areas, a railway station, retail centre, and sports clubs. Once called a 'boom' suburb due to its growth into the green belt. Several sports clubs, schools and churches.

2.4.6 Minworth – adjacent to Walmley it comprises housing estates and a major retail park including a large Asda, plus employment areas.

2.4.7 Falcon Lodge – predominantly 1950's council houses of reasonable reputation with six churches, four schools and shopping and community facilities.

- 2.4.8 Four Oaks falls within GVA's Market Value Areas 1 and 2. Four Oaks is a highly aspirational address, Area B is immediately to the east and is a natural extension to Roughley being part of the wider Four Oaks district. It certainly would set it apart from any other Birmingham location and most certainly Walmley which is classed as a Market Value Area 4 by GVA.
- 2.5 To reinforce this BCC's 'Housing Delivery on Green Belt Options Paper (**Appendix 3**, para 8)', states that the NE Arc is made up of different markets:

"the above areas are arranged from north to south down the east side of Sutton Coldfield. As can be seen, the asking prices of nearby homes varies – with those around the Reddicap area markedly lower and generally those to south lower than those to the north".

3. Potential of the North East Arc

- 3.1 Savills report – Birmingham Strategic Growth Review (March 2014), sets out the opinion, that the NE Arc can deliver much greater development in the Development Plan period to 2031, than solely the Area C, Langley urban extension.
- 3.2 The detailed Savills opinion is not repeated here, suffice to say it is based on the following:
 - 3.2.1 Areas B and C cover an extensive land mass. From north to south extremities of the two, the distance is close to 6 miles. Such a distance within an urban area would have many local districts and markets. Taking Birmingham as an example, one can envisage this. Sutton Coldfield with its 27 districts and sub districts is of similar distance north to south.
 - 3.2.2 This land mass physically can accommodate two urban extensions. PBA concur with this, but not that market delivery potential exists for Areas B and C.
 - 3.2.3 Savills elaborate above why two developments would be complementary, not in competition. Savills March 2014 report set out the multiplicity of development sales outlets that can potentially be covered at the same time. The list included six classes of standard house ranges from starter homes up to high value executive homes, plus two additional types for specialist care homes and affordable homes.
 - 3.2.4 These outlets would be built by several house builders. Furthermore it is not uncommon for competing house builders to build similar outlets at the same time. Savills see that as potential upside but we did not include them in our calculation.
 - 3.2.5 Area B benefits from existing major highways. There are up to thirteen potential development access points, eleven of which allow many potential outlets to be developed. This optimises potential for contemporaneous outlet development (see LDA Plan “Phasing” – **Appendix 4**).
 - 3.2.6 Also within **Appendix 4** we include plans to illustrate the Green Infrastructure quality of Area B; also its proximity and ability to be integrated into the Social Infrastructure of Sutton Coldfield urban area to the west.
 - 3.2.7 Savills delivery rate is estimated at an average ranging from 0.75 to 1 sale per week, equating to 40 to 50 homes per annum per outlet. This was further calculated to estimate that any one of the three NE Arc Areas could deliver at peak annual production on the eight identified ranges, 320 to 400 homes per annum. This is based on 1 sale per week on higher density sites and 0.75 on the lower density areas.
 - 3.2.8 Across the three Areas this could amount to 960 to 1,200 homes per annum. With a development lead in time of five years this enables 12,000 to 15,000 homes in the Development plan period.
 - 3.2.9 Savills then reduced this by assuming that if only six housing ranges would be relied on for delivery, the total figures reduced to 9,000 to 12,000 across all three Areas. This equates to 720 to 900 homes per annum.
 - 3.2.10 Considering that 35% of homes are to be affordable homes, this is even more achievable. Affordable homes are far less speculative than private homes; they are ‘built to order’.

4. Observations on and response to the PBA Phase 2 Report of Study (June 2014)

- 4.1 Drawing on reports from Hourigan Connolly (planning consultants) and DCLG/University of Glasgow, PBA (4.12 to 4.20) seek to counter Savills delivery rates. This is argued on the basis that insufficient outlets can simultaneously be developed. Also that similar size major sites have performed at much slower delivery rates. Therefore no more than one urban extension should be developed in the NE Arc. PBA also say that to deliver the Savills rates there aren't enough house builders to achieve that (4.18 & 6.5). Savills suggest that great caution should be taken about these claims. Savills address PBA's key assertions as follows:
- 4.1.1 Outlets – the DCLG/University of Glasgow report claims, that house builders do not develop more than one site each, within less than six mile distances (3.8 to 3.13 & Table 2). Savills strongly dispute this, it is contrary to reality in many locations. Letters of support from house builders confirming their readiness to build in more than one NE Arc Area at the same time, were presented with Savills March report. If such a fact were true, it would seriously prejudice the delivery of BCC's SHLAA sites, which almost all fall within six mile distances.
 - 4.1.2 Programme – the 'Indicative Delivery Trajectory for SUEs' (Section 3, Figure 3) is pessimistic. Savills clients' on Rugby Radio Station obtained a section 106 for 6,200 houses in six months from the 'resolution to grant consent' decision. Much depends upon how much section 106 work is run in parallel with the application. PBA's two years three months is definitely pessimistic. A strong advantage of Area B is that it is predominantly controlled by two organisations, working in collaboration.
 - 4.1.3 Delivery Rates – the Hourigan Connolly report was commissioned by Gladman. They are an astute development site promotion company, very successful with sites of only a few hundred each. Their corporate brochure lists that they have 50 promotion sites, the largest of which are a couple of 300 and 330 plots each. It is in their interests to see urban extensions being less favoured by local authorities, so as to open up the prospects for more sites being released of Gladman's chosen size, in place of major urban extensions.
 - 4.1.4 Insufficient House Builders – PBA's statement (4.18 & 6.5) shows a fundamental misunderstanding of Savills delivery description. Savills statement is that one, or more likely a few major house builders, would develop several distinctly varying housing outlets, at the same time on one urban extension. One outlet could be very high density small homes; another middle market family housing; another being executive low density detached; other ranges would be within these. None of the outlets would seriously compete with each other; therefore they can be delivered contemporaneously, further more competing house builders may well build similar outlets at the same time. This would be very similar to how the car industry competes, with each manufacturers having similar specifications but varying designs for different tastes and needs. In addition will be 35% affordable homes. Following this description it can be seen how multiple, simultaneous outlets can be delivered on major urban extensions by a small number of house builders. In all likelihood it would be several of the top ten national house builders. Savills appended to its March report, seven letters from ten of the national and regional house builders, more could have been approached. If only a few from this number were involved, it could achieve the Savills delivery rates. It does not have to be "24 house builders that don't exist in the UK" to paraphrase PBA (4.8 & 6.5).

- 4.1.5 Annual Delivery – an example of high rate delivery which does not exist in the Hourigan Connolly report is Emerson Green, Bristol. This site delivered over 500 homes per annum for four years, peaking at 564 pa for two, on a site of 2,865 homes. Birmingham surely has the market capacity to do likewise, particularly in such an affluent area as Sutton Coldfield. Savills delivery forecast is greatly assisted on Area B by the fact that it is located on existing highway infrastructure. Subject to capacity, this enables development starts in eleven potential locations at similar times (see LDA Figure 11).
- 4.2 Using examples of Sutton Coldfield historic sites, PBA use three for local delivery potential (2 & Table 1). At circa 500 units each these were all relatively small and not comparable with major urban extensions such as Areas B and C. More than one outlet did exist on some of them but not constantly, plus the sites were too small for multiple outlets due to:
 - 4.2.1 The sites lack multi access points and at 500 units they aren't large enough to cover all six to eight housing ranges listed in 3.2.3. combined.
 - 4.2.2 House builders like to secure about three years plot supply, 150 plots per outlet, say. This ensures them continuity, but reduces the number of land sales on a 500 unit site to generate multi outlets.
 - 4.2.3 Duttons Lane, known as Harvest Fields is controlled by Crest Homes. They suffered severe corporate financial problems around 2006. It is believed that Section 106 thresholds were reached and Crest could not afford to fund the required infrastructure construction, this prohibited housing occupations. For this reason no development and sales occurred for six years, most of which were the recession times.
 - 4.2.4 Annual cumulative delivery did not therefore reach levels achievable from major urban extensions. However, strong positives can be drawn from some of the annual delivery figures:
- 4.3 Off three sites, years 2001 and 2002 delivered 369 and 422 sales. Also, taking the four years of 2000 to 2003, an average of 292 sales per annum were achieved. These would have been the years when more than one outlet per site was likely. Savills see this as evidence that major urban extensions could multiply this up very significantly.
- 4.4 PBA's statistics in 3.26 of their report about mean annual units delivery at 106 is misleading. The total delivery should not be divided by 15 years due to the Duttons Lane commercial problems.
- 4.5 Infrastructure costs by PBA are set out in table x Section 5, Table 3. This illustrates their view that developing the whole of the NE Arc would require finances that the industry do not have. Savills opinion of this table is:
 - 4.5.1 Development is over the years up to 2031. This is certainly long enough to finance the costs. Much will become self financing once substantial revenue has been generated from sales.
 - 4.5.2 Many of the costs should more appropriately be treated as standard development costs, for example plot utility connections, drainage etc. PBA's table is far too general to be reliable. Their assumption that each residential unit is only worth £150,000 is inaccurate. For Area B an average house would approach 1,000 square feet in size. Taking GVA's advice that Four Oaks area values are in the region of £230psf, Area B could be £230,000 for an average house value. Walmley on the same basis would be £175,000.

- 4.5.3 PBA's assertion (5.14) that school delivery on major sites is difficult, is equally relevant to delivering the same quantum of houses across a number of small sites. If BCC took that multi site choice, it would be even harder for BCC as they would have to find and acquire a school site or sites. Area B could deliver the school requirements as needed.
- 4.5.4 Savills suggest that PBA's Section 5 about infrastructure and delivery across more than one urban extension in the NE Arc, should be taken with great caution.

5. Conclusions

- 5.1 BCC's Development Plan lacks provision for high quality housing sites. It does not allow land for aspirational and top end market housing. This could strongly prejudice economic growth.
- 5.2 Solution is to release Area B of the NE Arc, adjacent to BCC's highest quality suburb. Area B is a sustainable solution, a natural expansion of and strongly integrated with Sutton Coldfield.
- 5.3 Lessons can be learned from Rugby and Cambridge, to name but two, both much smaller populations, but delivering more than one urban extension each.
- 5.4 Sutton Coldfield is a major part of BCC's area, yet only 6,000 homes are being allocated there.
- 5.5 Savills are confident that their delivery and number of housing outlets are credible, particularly as Area B has potentially eleven development access points off existing highways, subject to capacity.
- 5.6 PBA rely too heavily on the Hourigan Connolly report. The report was produced for the specific purpose of creating a negative view about major urban extensions, so that fewer would be allocated and many smaller sites would be needed instead.
- 5.7 BCC's reliance on neighbouring authorities to allocate the equivalent housing numbers in place of development of Area B, would result in significant delay, even if achievable.
- 5.8 Furthermore the benefits of developing the much needed type of housing within Area B of the NE Arc should not be delayed just because of the stepped trajectory over the DP period (TP28). NE Arc land supply would be a very significant source of housing supply, impossible to deliver elsewhere within the City boundaries.

Appendix 1

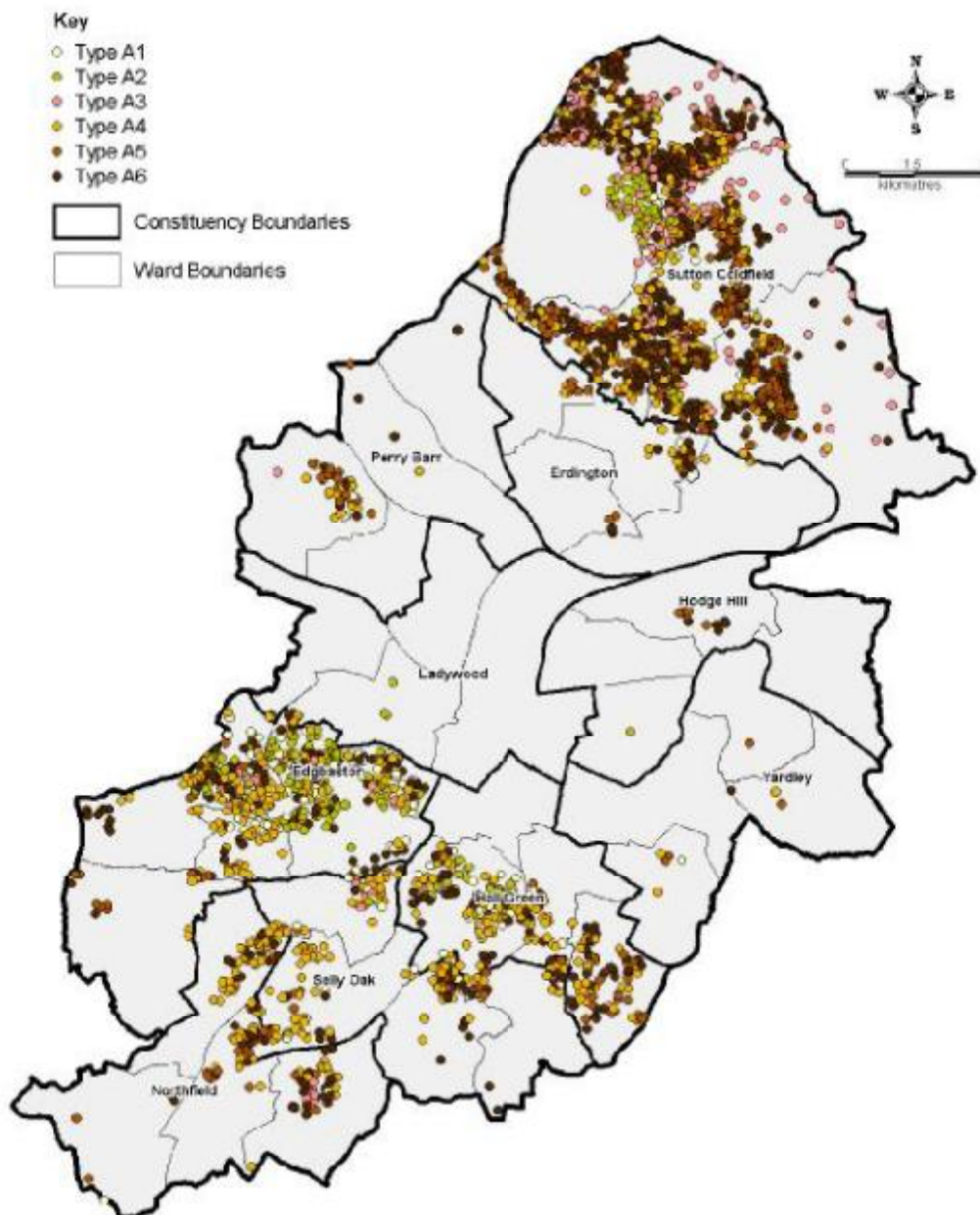
The Key experience of Savills are:

- Major International, UK and regional property consultants, winner of the Top Brand in Property award 7 years in a row;
- UK wide we are instructed on over 150 sites of more than 1,000 plots each, 35 of which exceed 4,000 plots;
- Savills Birmingham office is the leading team for development land sales and consultancy across the West Midlands with a team of 12 people;
- We have recently sold over 364 acres/3,500 West Midlands residential plots for in excess of £168M;
- Our numerous West Midlands instructions on sites ranging from 50 up to 6,200 plots per site provides us with extensive knowledge of the market;
- Involved before planning consent and during the life of developments, we have first hand knowledge of the performance dynamics of major sites.

Appendix 2

Types of Residential Areas in Birmingham

Distribution of Postcodes by Birmingham Segmentation Group, 2010
Group A - Career Professionals Living in Choicest Housing

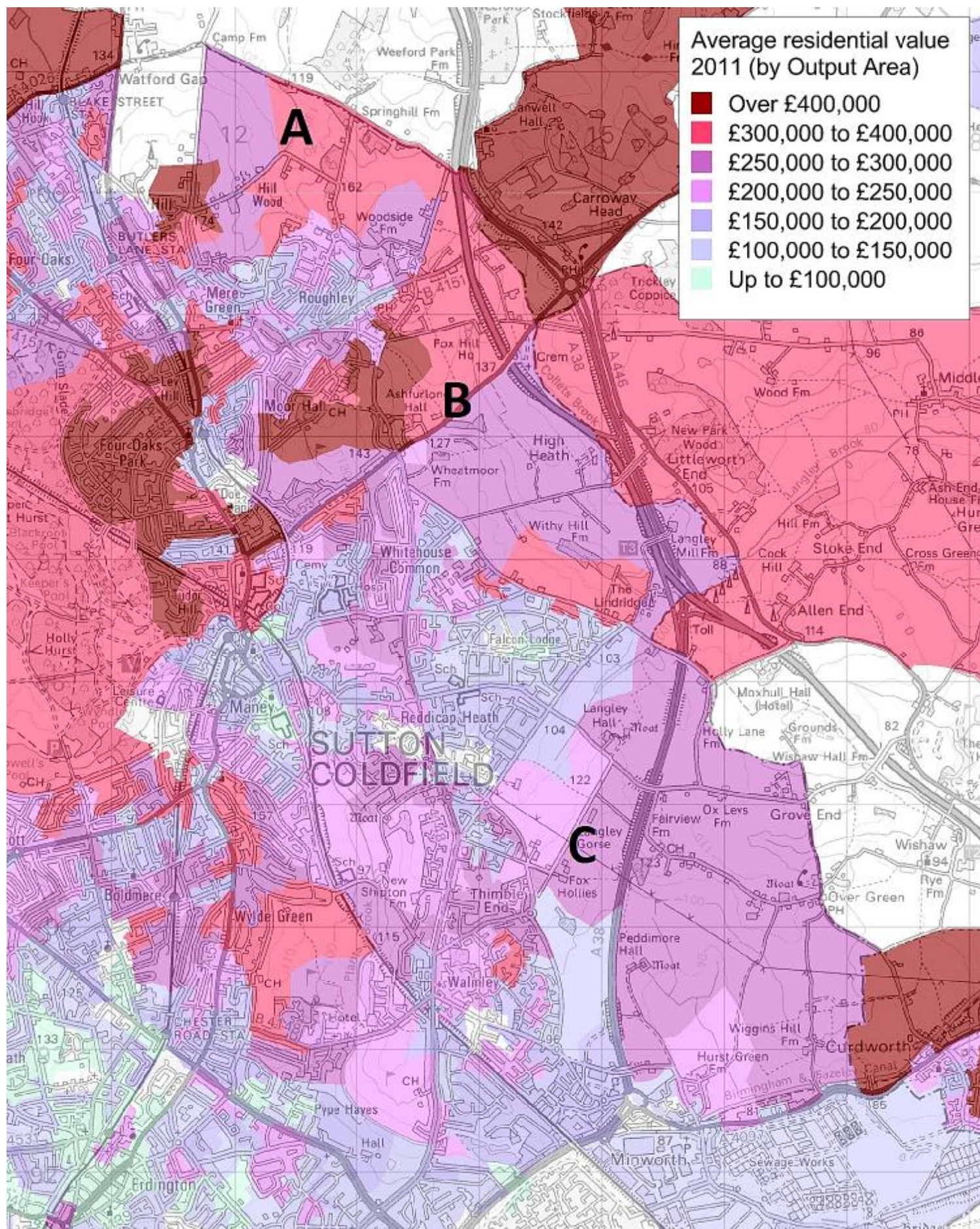


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Source: Experian

Group A households are mainly in Sutton Coldfield and Edgbaston constituencies with smaller concentrations in several of the outer wards including Weoley, Moseley and Kings Heath, Handsworth Wood and Hall Green.

Appendix 3



Appendix 4

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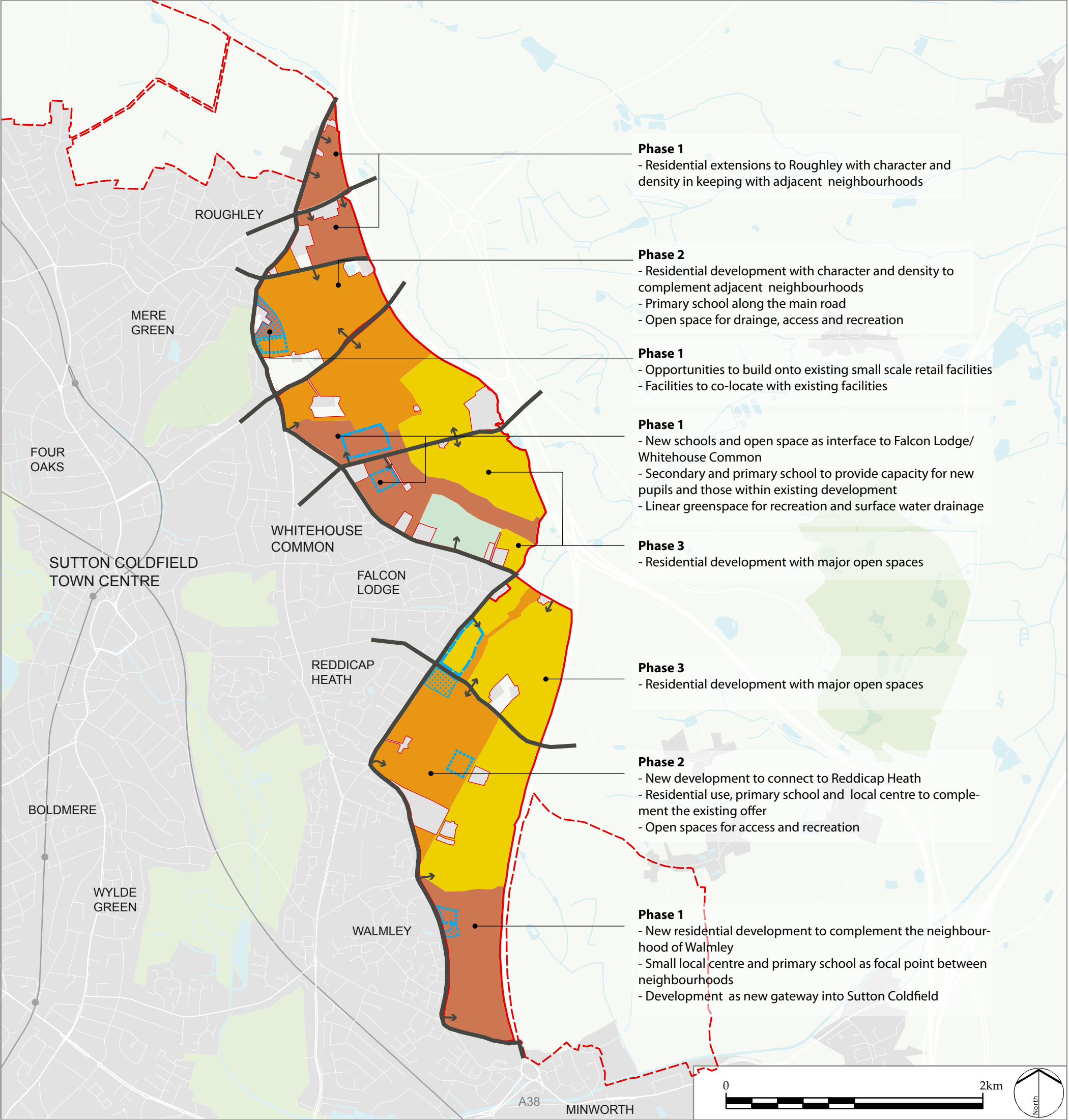
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FOX HILL, BIRMINGHAM
SITE APPRAISAL AND DEVELOPMENT POTENTIAL

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Figure. 15

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- Area boundary (B+C)
- Other areas forming part of the Green Belt eastern arc
- Retained property within the site boundary
- Existing principal network of roads surrounding the site

- Potential phase 1 of development 2,700 dwellings approximately
- Potential phase 2 of development 3,370 dwellings approximately
- Potential phase 3 of development 2,930 dwellings approximately
- Potential access points

- Location of primary school
- Location of secondary school
- Location of local centre

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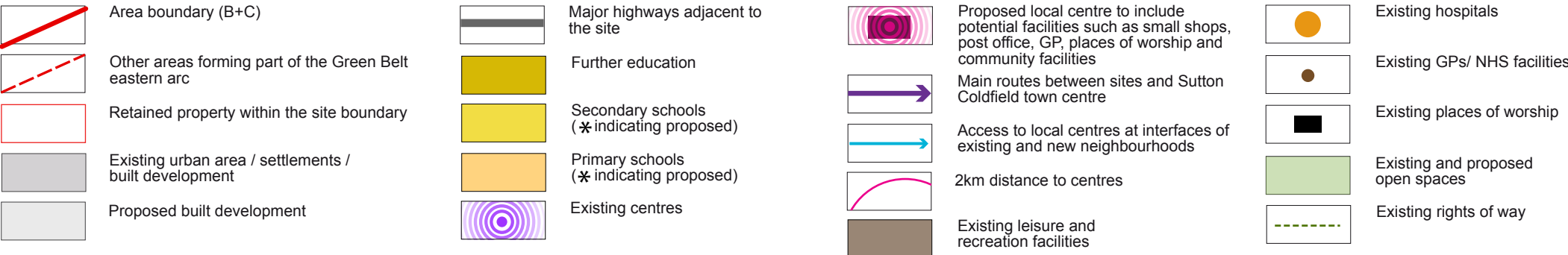
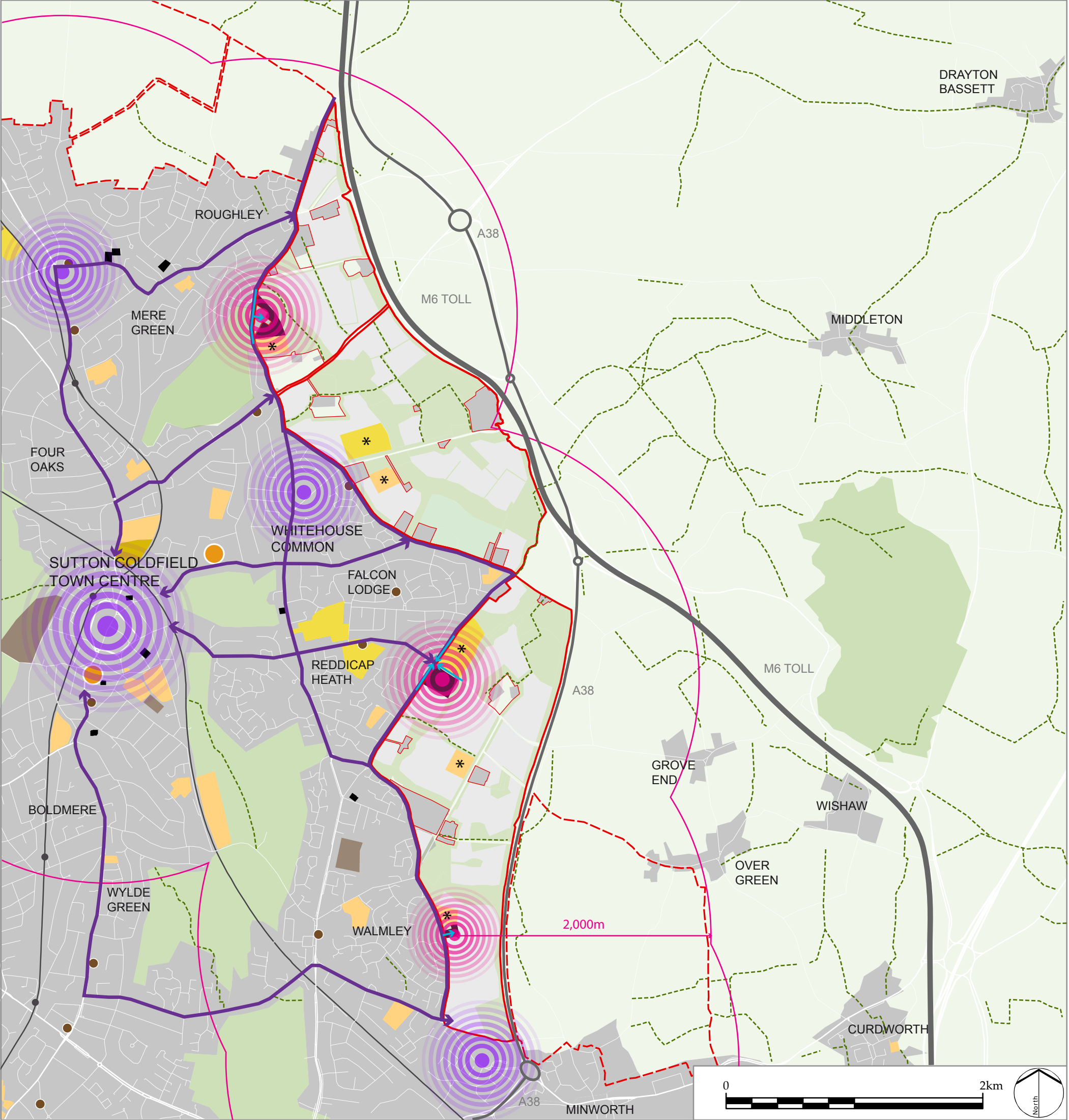
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DRAWING TITLE
Access to Social Infrastructure
Figure. 13

DWG. NO. 3758_FP008



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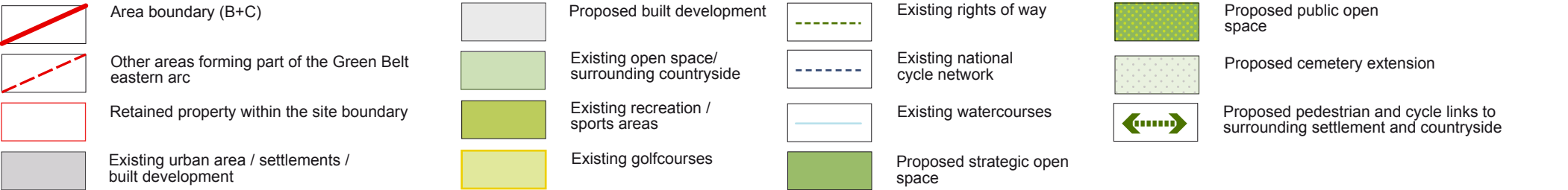
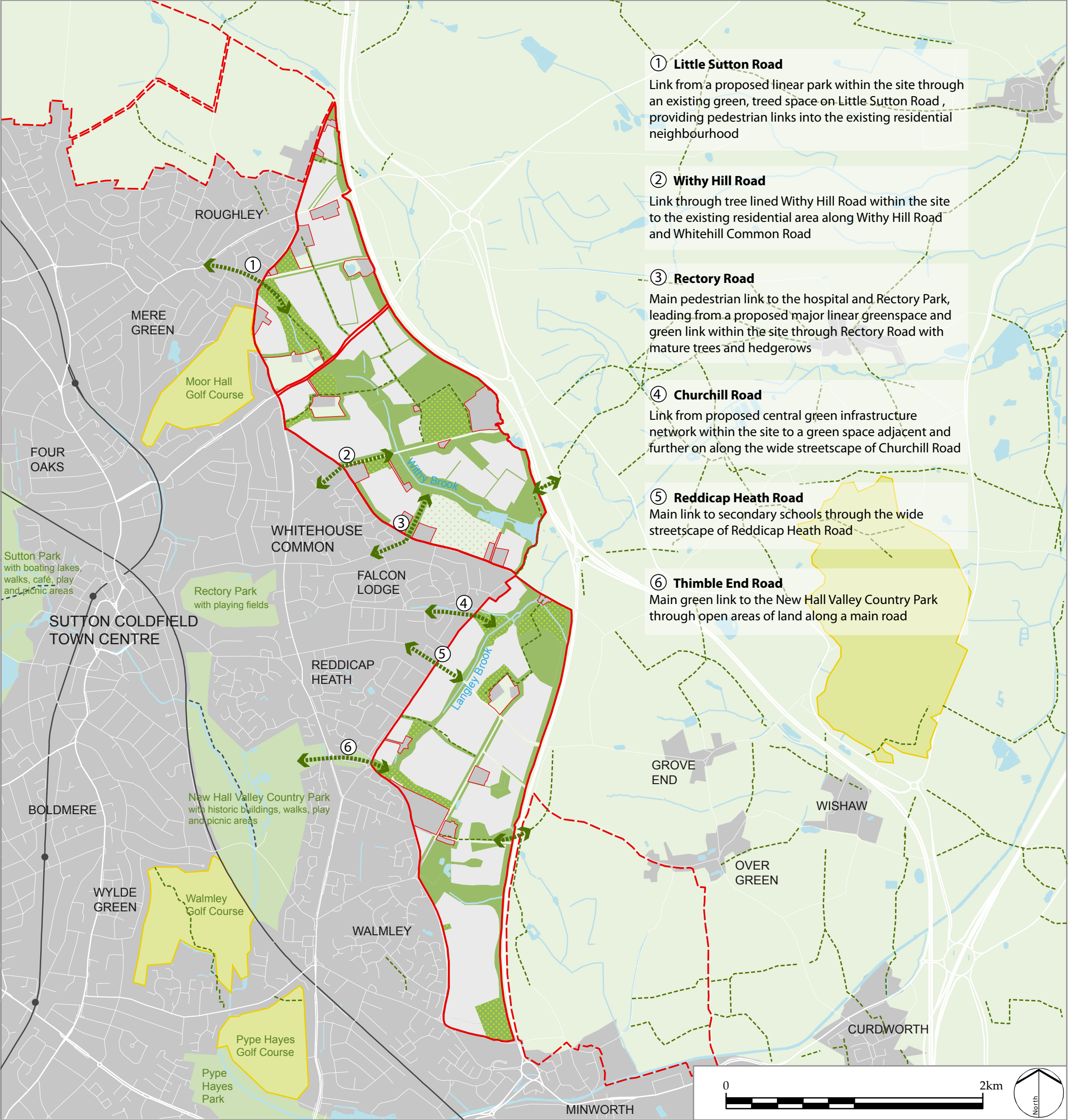
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PROJECT TITLE
FOX HILL, BIRMINGHAM
SITE APPRAISAL AND DEVELOPMENT POTENTIAL

DRAWING TITLE
Access to Green Infrastructure

Figure. 14

DWG. NO. 3758_FP009



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