

BIRMINGHAM DEVELOPMENT PLAN EXAMINATION 2014

MATTER H: NEIGHBOURHOODS AND HOUSING PROVISION

STATEMENT BY SAVILLS ON BEHALF OF TAYLOR WIMPEY

OCTOBER 2014

1. This statement is made on behalf of Taylor Wimpey. Taylor Wimpey is part of the Langley SUE Consortium and has an interest in c.40ha of the southern end of the Langley SUE. As a national housebuilder, Taylor Wimpey has extensive experience in promoting and delivering strategic housing development.
2. This statement should be read in conjunction with the Statement made on behalf of Taylor Wimpey with respect to Matter E (The Langley SUE).

Question 1. As required by NPPF paragraph 47 have the Council identified: a) a five year supply of deliverable housing sites?

3. Taylor Wimpey notes that Birmingham City Council (BCC) recently published an updated (June 2014) 5-Year Land Supply Statement, which states that it can demonstrate 6 years supply based on a requirement of 51,100 dwellings.
4. Whilst there remains uncertainty over what the full objectively assessed housing need (OAHN) is for Birmingham, as highlighted by the Inspector's clarification questions on Matter A (EXAM 7), it appears that the OAHN is likely to be in excess of 81,500 dwellings. In calculating the five year housing land supply against the full OAHN for Birmingham, it would appear that BCC would not be able to demonstrate a five year supply of deliverable housing sites.
5. Notwithstanding the uncertainty over the OAHN, Taylor Wimpey considers that the discussion over housing numbers should not prevent the Langley SUE from being identified as a sound allocation within the Birmingham Development Plan.

6. The Langley SUE is not identified in either Appendix 1 of the BCC updated 5-Year Land Supply Statement or in the BCC September 2014 Strategic Housing Land Availability Assessment as contributing towards the five year supply of deliverable housing land. Taylor Wimpey considers that the Langley SUE, with appropriate phasing, can deliver housing within the next five years, which will assist BCC in reducing its five year housing land supply shortfall.
7. 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.

Question 3. Is policy TP27 justified in requiring infrastructure to be put in place before new housing is provided?

8. Taylor Wimpey notes that the BCC CIL Draft Charging Schedule (September 2014) currently proposes that the Langley SUE should be nil-rated. On this basis the development-specific infrastructure requirements for the Langley SUE would be delivered through S106 obligations, which could be phased to accord with the phased delivery of the SUE by a number of parties.
9. Taylor Wimpey acknowledges the importance of having appropriate infrastructure in place to meet the needs of development, but wishes to stress with reference to the Langley SUE that it would not be necessary to have all the infrastructure required by the SUE to be in place prior to the commencement of development on the SUE. There is potential for early delivery at the

southern end of the Langley SUE without the need for significant up-front investment in new infrastructure. S106 contributions from the early delivery of housing development on the SUE can release funds to facilitate delivery of development and infrastructure in the remainder of the SUE, linked to housing completions and S106 delivery thresholds where appropriate.

10. It is therefore important for policy TP27 to retain the flexibility it currently proposes through acknowledging that new development should be adequately served by new or existing infrastructure. However policy TP27 should also acknowledge the implication that the phased delivery of larger housing sites can have on infrastructure delivery.

Question 4 a). Are the provisions of policy TP29 adequate to ensure the provision of a mix of housing to meet the needs of different groups in the community?

11. Taylor Wimpey notes that the provisions of policy TP29 are broadly consistent with NPPF paragraph 50.
12. Notwithstanding the requirement for BCC to undertake a Strategic Housing Market Assessment (SHMA) for the relevant Housing Market Area, in compliance with NPPF paragraph 159, Taylor Wimpey considers that it is important that policy TP29 is sufficiently flexible to enable market signals and local housing market trends and requirements to be taken into consideration (NPPF paragraphs 50 and 158). Taylor Wimpey therefore requests that the wording of policy TP29 specifically takes market signals and local housing market trends and requirements into account.
13. Policy TP29 needs to be sufficiently flexible to enable the particular dynamics provided by the location of the Langley SUE, as well as the specific reference in policy GA5 to the Langley SUE providing a particular focus on the provision of family housing and the identification within the 2012 Birmingham SHMA (as revised in January 2013) that there is significant demand for larger (3-bed and in particular 4-bed) properties, to be taken into proper consideration in the planning and delivery of the Langley SUE. Conversely, other sites within the City, in particular smaller previously-developed sites, may be better suited to delivering

smaller dwellings, or a different housing product, or be developed to meet a different community need.

14. The density requirements of policy TP29 also need to be sufficiently flexible to enable these local market considerations to be accommodated appropriately. The density thresholds and minima included within policy TP29 do not currently provide sufficient flexibility to enable this to be achieved effectively.

Question 4 b). Is the policy sufficiently flexible to ensure its effectiveness?

15. Please refer to the answers to Questions 4a) and 5.

Question 5. Are the density requirements of policy TP29 justified?

16. 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.
17. Taylor Wimpey considers that it would not be appropriate to apply a 'blanket' requirement of at least 40dph for residential development on sites outside of the City Centre and is concerned about the potential ramifications of policy TP29 for the phased delivery of the Langley SUE (policy GA5).
18. Taylor Wimpey wishes to reiterate that the BCC evidence base does not provide clear justification that BCC has been able to consistently achieve the density minima identified within policy TP29 in the past. Taylor Wimpey therefore questions why the density minima set out within Policy TP29 are deemed to be appropriate for application to all development sites coming forward over the next Plan period across the BCC administrative area.
19. Taylor Wimpey submitted an illustrative masterplan relating to the southern area of the Langley SUE to support representations made to the BCC Birmingham Development Plan Options Consultation Document in January 2013. This illustrative masterplan was based on densities of 30-35dph for this area. The supporting representations statement for this consultation stage, prepared by Savills, summarised why it is not considered to be

appropriate to apply a density of 40dph to a Green Belt urban extension and provides examples (at Appendix 2) to demonstrate that housing schemes across the Midlands have been achieving densities of between 30-35 dph. Housing schemes across the Midlands (as opposed to schemes which rely on a significant element of apartment provision) continue to achieve densities of less than 40dph.

20. Taylor Wimpey is keen to highlight that large-scale urban extensions have significant infrastructure requirements, which need to be carefully masterplanned, as well as a need to address to market requirements and respond to the site context and physical characteristics. These create a particular set of 'local circumstances' that need to be taken into consideration in reaching an appropriate development density for an urban extension. This has been evidenced through the achieving of 30-35dph in other 'exemplar' urban extensions across the Country. A 40dph density requirement 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 40 dph is a maximum density and that most developers are seeking lower densities on greenfield sites, often down to 32dph. It would therefore not be appropriate to rigidly apply the policy TP29 density minima to the Langley SUE.
21. Taylor Wimpey therefore considers that, in its current form, the density minima in policy TP29 are not appropriately justified or sufficiently flexible to facilitate the effective delivery of development at the Langley SUE.
22. However, if the Inspector is still minded to retain the density minima set out in policy TP29, Taylor Wimpey requests that, to avoid ambiguity, the matters set out in this statement are taken into consideration and a specific Langley SUE exception is included within the policy. The specific exception should recognise that the appropriate development density for the Langley SUE will be established through the masterplanning of the allocation area, to take account of its infrastructure requirements, as well the a need to address to market requirements, including the provision of a significant number of family homes, and respond to the site context and physical characteristics, to avoid the potential for conflict with policy GA5.

Question 8. Are these policies effectively drafted to achieve their intended purpose and so they provide a clear indication of how a decision-maker should react to a development proposal?

23. Please refer to the answers provided within this statement to Questions 3, 4 and 5.