

Birmingham Development Plan 2031

Examination hearing statement

On behalf of:

1. The Gilmour Family
2. Sutton Coldfield Charitable Trust &
3. Bishop Vesey's Grammar School

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

1. Main issues: 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?

Questions:

- 1) **Does policy TP10 set out an appropriate approach to the management of the Green Belt?**

No response

- 2) **Do exceptional circumstances exist which justify an alteration to the Green Belt boundary to accommodate 6,000 new dwellings?**

We agree that exceptional circumstances exist which justify an alteration to Green Belt boundary.

Accepting that there are 'exceptional circumstances' justifying the altering of Green Belt boundaries to accommodate housing (and employment) requirements, the Council's assessment of its Green Belt is flawed, and when properly carried out, there is justification for a more widespread release of land from the Green Belt both to meet current and longer term needs as required by the NPPF. The reasons for this are set out in Section 2 of our Part B representations including Appendices B & C incorporating reports from LDA Design and CgMS. BCC has provided no rebuttal of this evidence.

We consider that exceptional circumstances exist to justify an alteration to the Green Belt boundary to accommodate a further 5,000 dwellings in North East Birmingham as set out in our Part B representations.

3) Do exceptional circumstances exist which justify an alteration to the Green Belt boundary to provide 80ha of employment land?

No response

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 the Langley SUE?

We believe there is a strong justification for the release of Area C from the Green Belt but given the clearly identified need to provide a greater quantity of housing within Birmingham, also believe that there is equal justification to release Area B in addition to C from the Green Belt for residential development.

Paragraph 5.60 of the pre-submission BDP states that;

Land West of the A38 is clearly the most sustainable and accessible of all the options considered....

Robust evidence was submitted in previous representations ¹paragraphs 1.6 – 1.11 which demonstrates that the SA is unsound in its current form for a number of reasons and has incorrectly assessed (and demonstrated in the SA report) Area B

¹ Land North East of Birmingham. Sustainability Appraisal. February 2014. Turley

in respect of a sustainable, additional option to meeting a greater proportion of the housing demand within Birmingham.

We believe that there is strong evidence (section 3 of previous representations) to demonstrate that Area B, following a detailed reappraisal and correction of reporting errors, is just as sustainable as Area C when assessed against the SA framework. Development of both Area B and C would present the most sustainable option to meeting the identified housing need.

Birmingham City Council have published a response² to our representations which does not rebut the statement that the release of Area B and C is the most sustainable option for meeting Birmingham's housing need. This note also refers to a Green Belt Options Assessment undertaken by Birmingham City Council as further evidence to justify the conclusions of the SA. We have provided evidence demonstrating this assessment to be unsound³, thereby further weakening the conclusion that only Area C is the most sustainable option for the provision of residential development in the Green belt.

The release of Area B and C would provide approximately 9 - 10,000 dwellings within the administrative boundary of Birmingham thereby reducing the quantum needed in adjoining authorities. The Technical Note⁴ and SA of the submission BDP⁵ state that;

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

The release of Area B would locate a substantial number of additional dwellings closer to places of work⁶, services and facilities⁷ thereby reducing transport

² Evolution of the Sustainability Appraisal of the Birmingham Development Plan. Technical Note. June 2014. AMEC

³ X REF Green Belt Review by LDA.

⁴ Evolution of the Sustainability Appraisal of the Birmingham Development Plan. Technical Note. June 2014. Page 6, Para 1. AMEC

⁵ Sustainability Appraisal of the Birmingham Development Plan. Sustainability Appraisal Report of the Submission Birmingham Development Plan. June 2014. Non-Technical Summary, Page x. AMEC,

⁶ Fox Hill, Birmingham. Access to Social Facilities . Figure 13

⁷ Fox Hill, Birmingham. Access to Green Infrastructure. Figure 14.

journeys and carbon emissions and improving local air quality. This sustainable approach to housing provision is fully supported by paragraphs 30, 37 and 95 of the Framework and would substantially resolve the uncertainty referred to in above. Furthermore, this would fully support policies TP1 (reducing the City's Carbon Footprint) and TP2 (Adapting to Climate Change) of the BDP.

Given that the preparation of a Sustainability Appraisal (SA) incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive is a legal requirement for the adoption of a sound development plan, a reassessment of the alternatives should be undertaken to avoid the risk of legal challenge.

Based on evidence submitted⁸ and lack of rebuttal from BCC, Paragraph 5.60 of the pre-submission BDB is unsound in its current form and should be amended to include Area B and C.

It is submitted that there is a robust justification for the release of Areas B and C from the Green Belt to create a high quality, low carbon, sustainable option to meet a greater percentage of the identified housing need within Birmingham.

b) Is the SUE deliverable within the expected timescale?

No response

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

We support the requirements of GA5 that will result in the creation of an exemplar of sustainable development. The addition of Area B would further support and compliment the requirements of GA5 and make a substantially positive contribution to the

⁸ Land North East of Birmingham. Sustainability Appraisal. February 2014. Section 3. Turley

development of a new, exemplar Sustainable Urban Extension at the edge of Birmingham.

6)

a) Is there adequate justification, including Sustainability Appraisal and assessment of the transport, drainage, sewerage and other infrastructure implications, for the selection of the Peddimore site for employment development?

No response

b) Is the development of the Peddimore site achievable within the expected timescale?

No response

7) Is there adequate justification for all the requirements of policy GA6, including preparation of a Supplementary Planning Document?

No response

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?

Accepting that there are ‘exceptional circumstances’ justifying the altering of Green Belt boundaries to accommodate housing (and employment) requirements, the Council’s assessment of its Green Belt is flawed, and when properly carried out, there is justification for a more widespread release of land from the Green Belt both to meet current and longer term needs as required by the NPPF. The reasons for this are set out in Section 2 of our Part B representations including Appendices B & C incorporating reports from LDA Design and CgMS. BCC has provided no rebuttal of this evidence.

We consider that exceptional circumstances exist to justify an alteration to the Green Belt boundary to accommodate a further 5,000 dwellings in North East Birmingham as set out in our Part B representations.

9)

a) If additional housing or employment land is required, or if 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?

A full justification to justify the release of additional specific areas of Green Belt is provided in our Part B representations including:

- Birmingham Strategic Growth Review - Savills - February 2014 (Appendix A)
- Fox Hill Birmingham Green Belt Review and Assessment - LDA Design - February 2014 (Appendix B)
- Fox Hill Birmingham Site Appraisal and Development Potential - LDA Design - February 2014 (Appendix C) including CGMS separate Archaeological Desk Based Assessments of Area B1 January 2014 (re-issued

February 2014) and Area B2 dated February 2014 and Heritage Review of Area C dated February 2014.

- Land North East of Birmingham Sustainability Appraisal - Turleys - February 2014 (Appendix D)
- Birmingham Development Plan Transportation Technical Review - WSP - February 2014 (Appendix E)

BCC has not provided any rebuttal evidence in respect of Appendices B, C or E.

As regards Appendix A, the Savills report, BCC has commissioned PBA/HDH to undertake a review of the Savills report entitled “Sutton Coldfield Green Belt Sites, Phase 2 report of Study (June 2014)” (Document Ref PG4),. Report. Savills have prepared a response which is attached as **Annex 1**. In summary it concludes inter alia that:

- 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.
- 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 Sutton Coldfield.
- Lessons can be learned from Rugby and Cambridge, to name but two, both much smaller populations, but delivering more than one urban extension each.
- Sutton Coldfield is a major part of BCC’s area, yet only 6,000 homes are being allocated there.

- 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.
- 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.
- 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.

BCC has also provided a response to our Part B Representation Appendix D - Land North East of Birmingham Sustainability Appraisal - Turley - February 2014. We consider that there is sufficient justification (as set out in 4a and in previous representations⁹) from a sustainability perspective to release **Area B, in addition to Area C**, from the Green Belt for residential development. This conclusion is further supported by representations which demonstrate deficiencies in the Green Belt evidence base, which in turn was used to support the conclusions (in so far as they are presented) that Area C is the most sustainable option for housing provision in the Green Belt.

LDA has given further consideration to the manner in which the NE arc could be development based on a detailed understanding of local circumstances. This material is presented graphically on three plans (attached as **Annex 2**) which are an iteration of the material provided in Appendix D of our Part B representations. They comprise:

⁹ Land North East of Birmingham. Sustainability Appraisal. February 2014. Section 3. Turley

- Figure 13 - Access to Social Infrastructure. This figure illustrates the integration of the existing and proposed social infrastructure, identifying existing and proposed schools to serve the existing and proposed communities, and local centres serving both existing and proposed new communities. The existing main highway network which is highlighted identifies the main routes between Sutton Coldfield town centre and the NE arc.
- Figure 14 - Access to Green Infrastructure. This figure illustrates areas of existing strategic and public open space, and connections with proposed strategic and public open space as part of the Development Framework for the NE arc. The figure demonstrates how the environmental green infrastructure benefits the city as a whole and creates a well-planned edge to the urban area and wider countryside beyond.
- Figure 15 – Phasing. This figure illustrates three potential phases for the development of the NE arc. The phasing proposed 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.

We invite the Inspector to undertake a detailed site visit of locations in North East Birmingham so that he may appreciate the diverse nature of the local communities in this part of the City and to examine the development principles that are set out in Appendix D of our representations. We would willingly provide an itinerary for the Inspector and anyone else if required. It will be apparent that it is not appropriate to view this vast area (6.2 miles north to south) as a single SUE location. Nor is it appropriate to apply desk-top generic academic analyses of SUE performance from around the country. What is required is a Birmingham based solution to a Birmingham problem that is based on local knowledge and a thorough understanding of the local context.

b) Would the development of the other area (s) / major greenfield site (s) be achievable within the plan period, or

The Savills response (attached as **Annex 1**) to the PBA report and the LDA plans (attached as **Annex 2** - Figures 13, 14 and 15) provide a robust assessment of the ability of Area B to be achievable within the plan period.

c) Should it/they be safeguarded for development beyond the Plan period?

As can be seen from the LDA reports attached as Appendices C and D to our Part B representations, we consider that there is a robust green belt case to justify the removal of Areas A and B in addition to C and D from the Green Belt, with Area A being safeguarded for longer term development needs in accordance with paragraph 85 of the Framework.

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

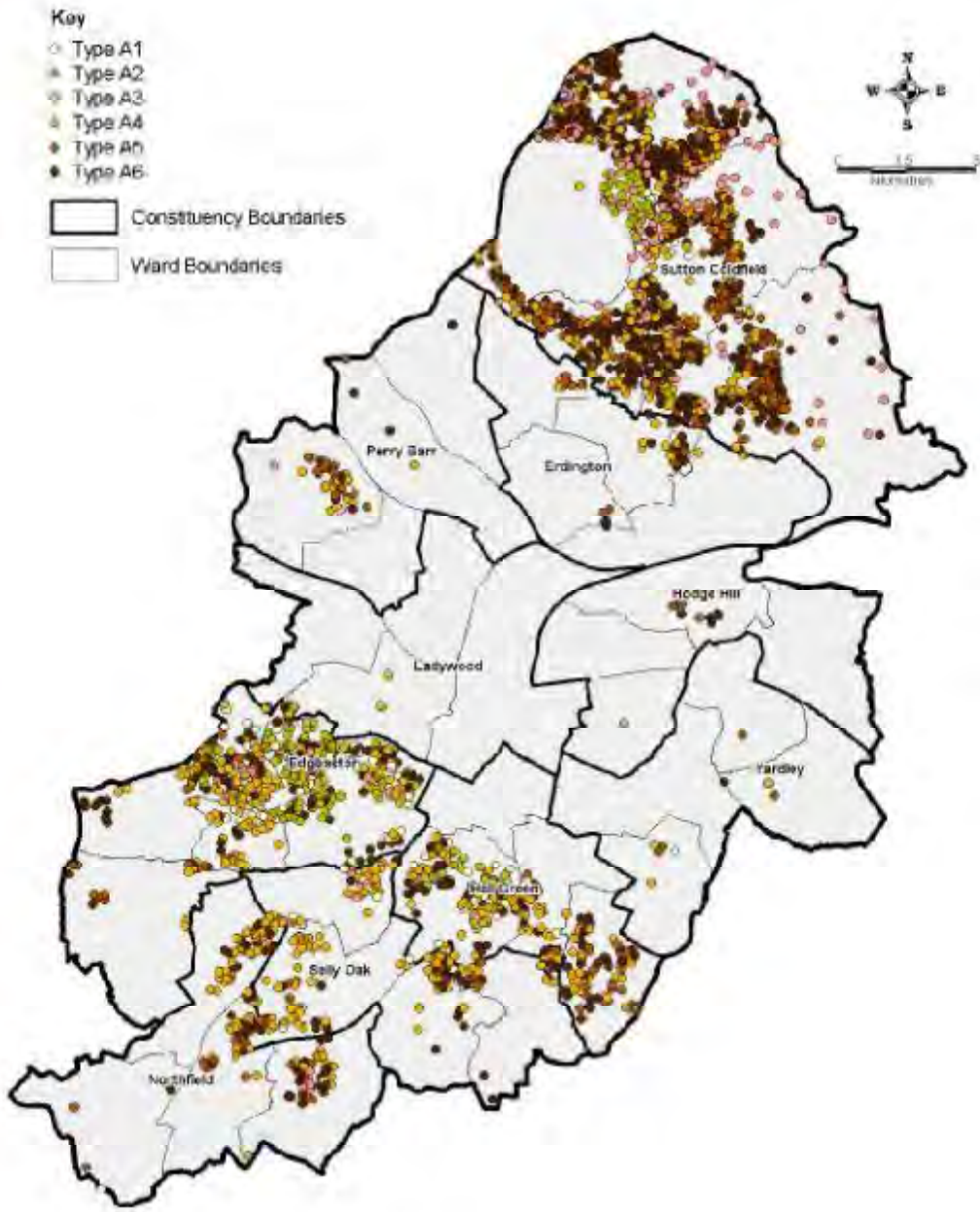
The Key experience of Savills are:

- 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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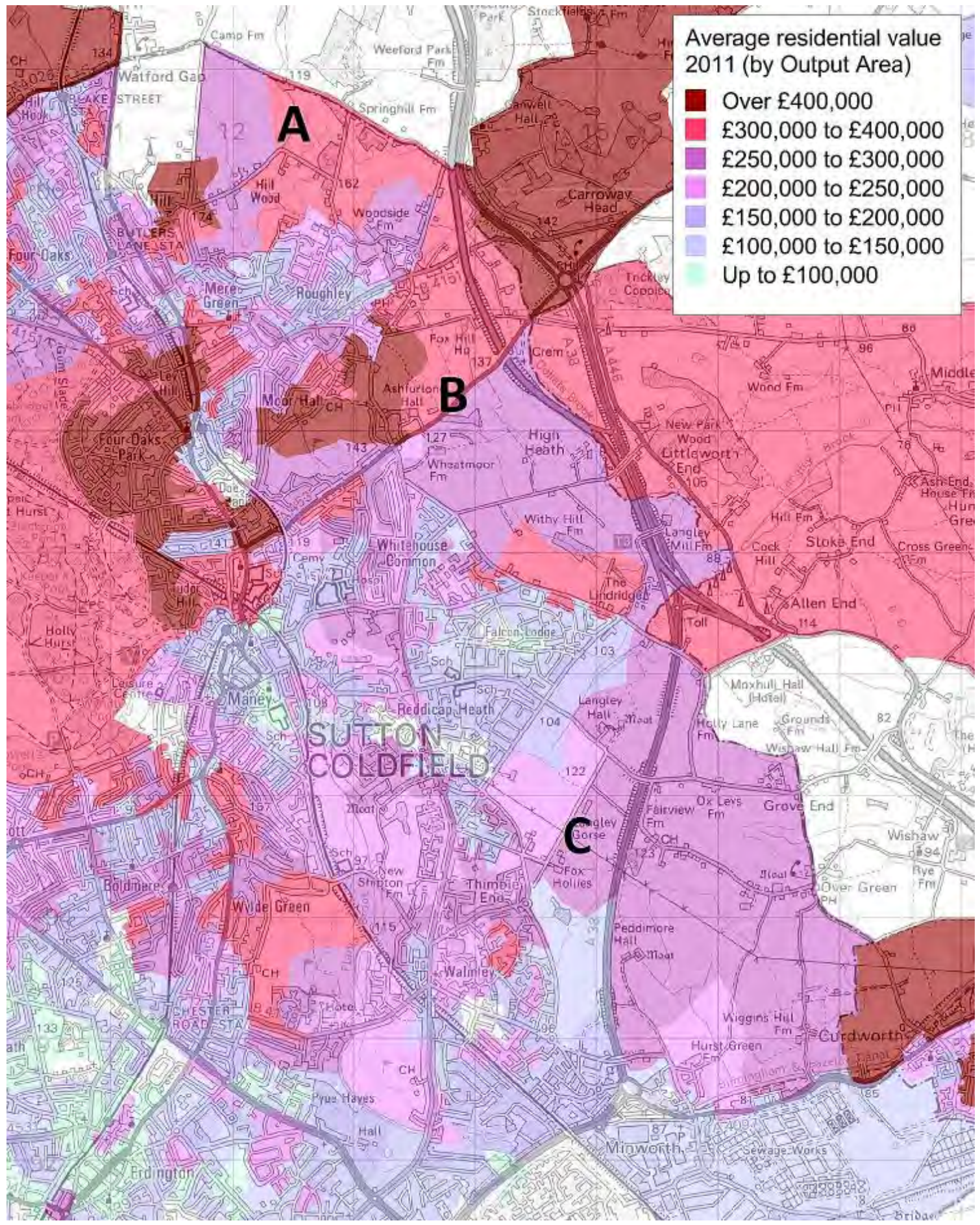
Source: Experian

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

Average residential value 2011 (by Output Area)

- Over £400,000
- £300,000 to £400,000
- £250,000 to £300,000
- £200,000 to £250,000
- £150,000 to £200,000
- £100,000 to £150,000
- Up to £100,000



Appendix 4

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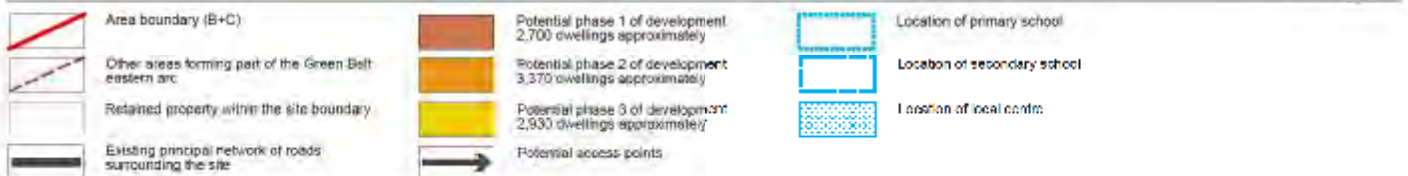
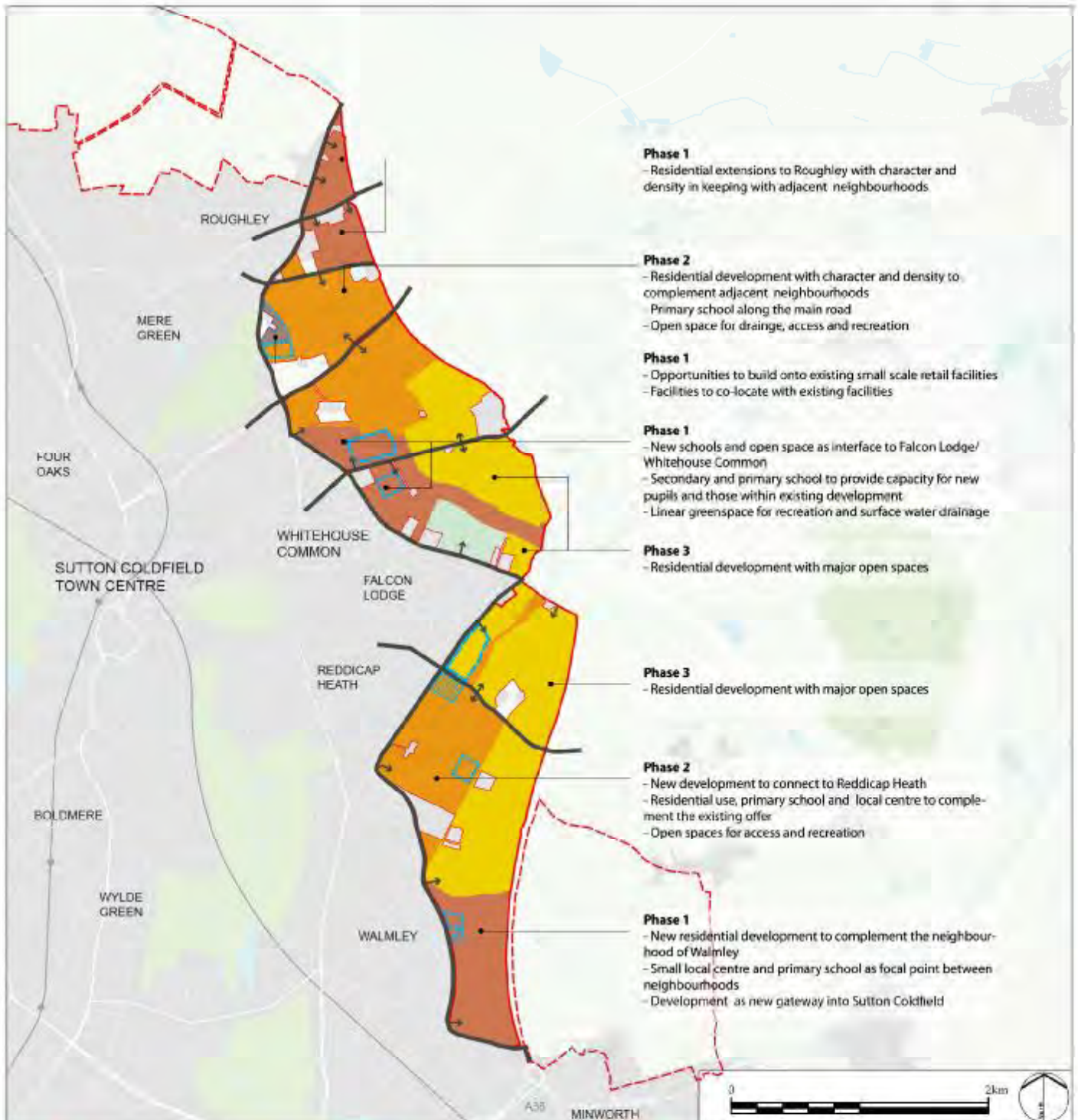
PROJECT TITLE
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Figure 15

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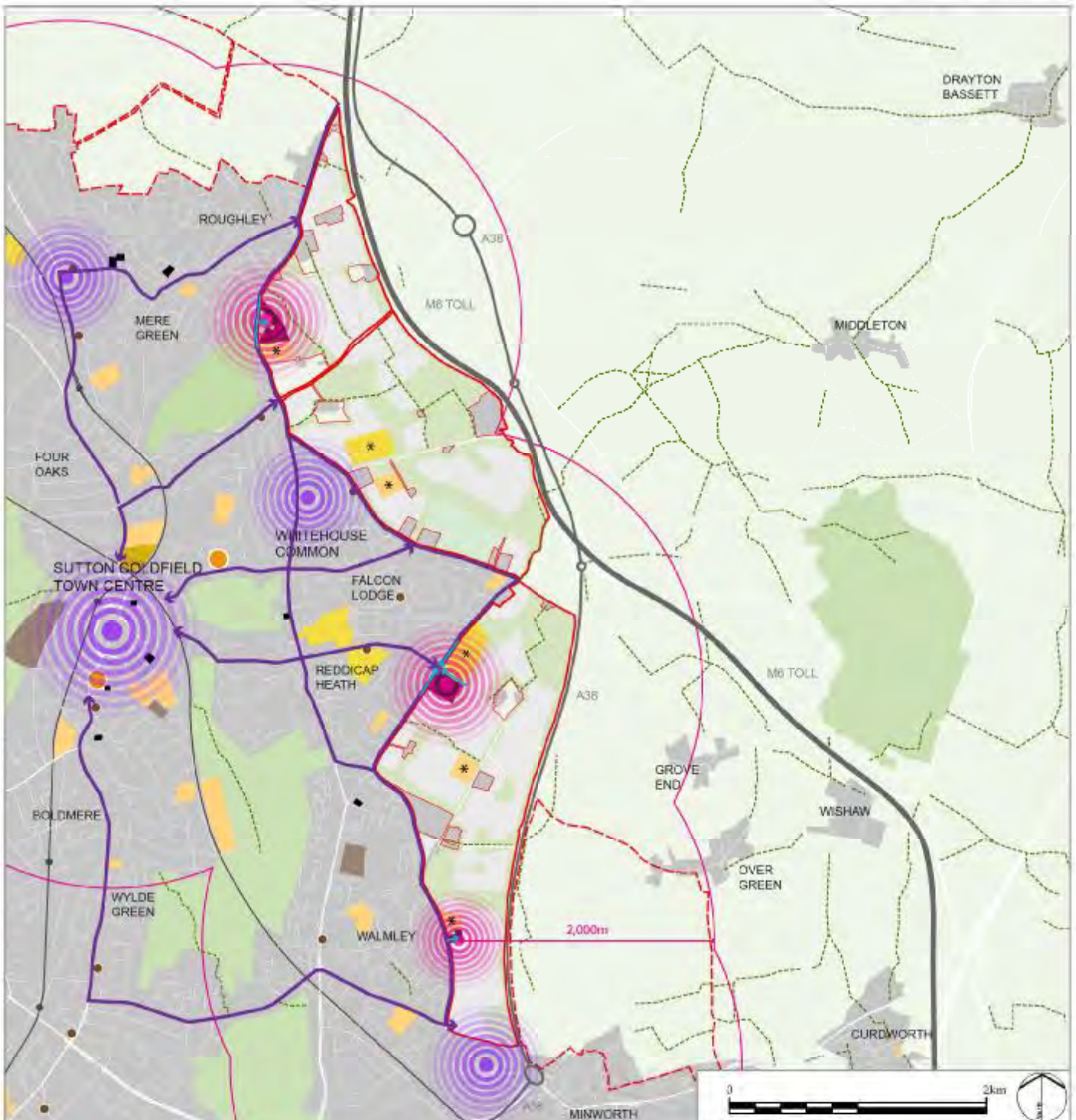
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Figure 13

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- | | | | |
|---|---|--|-----------------------------------|
| Area boundary (B+C) | Major highways adjacent to the site | Proposed local centre to include potential facilities such as small shops, post office, GP, places of worship and community facilities | Existing hospitals |
| Other areas forming part of the Green Belt system etc | Further education | Main routes between sites and Sutton Coldfield town centre | Existing GPs/NHS facilities |
| Retained property within the site boundary | Secondary schools (* indicating proposed) | Access to local centres at interfaces of existing and new neighbourhoods | Existing places of worship |
| Existing urban area / settlements / built development | Primary schools (* indicating proposed) | 2km distance to centres | Existing and proposed open spaces |
| Proposed built development | Existing centres | Existing leisure and recreation facilities | Existing rights of way |

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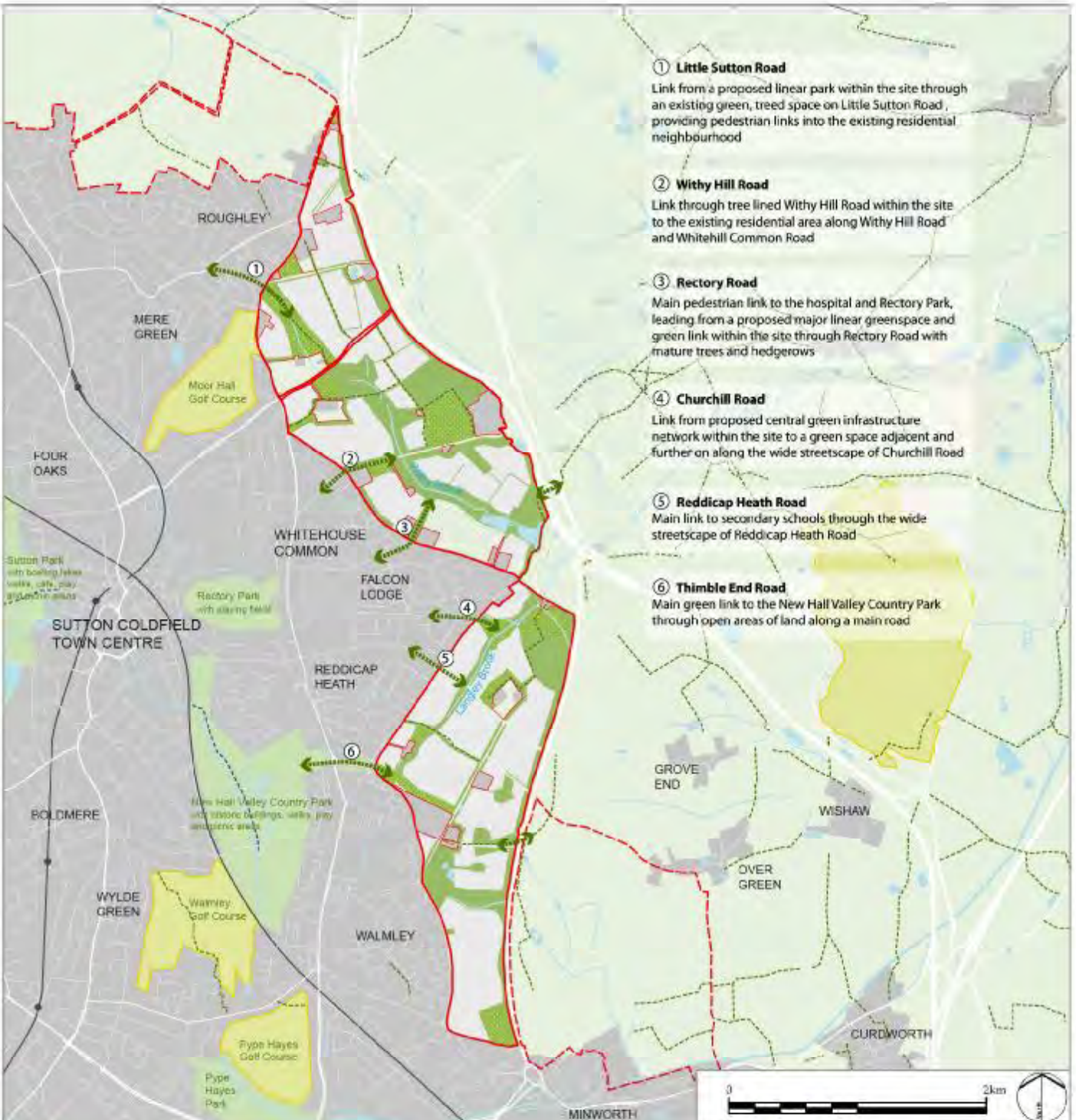
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DRAWING TITLE
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Figure 14

DWG. NO. 3758_FP009

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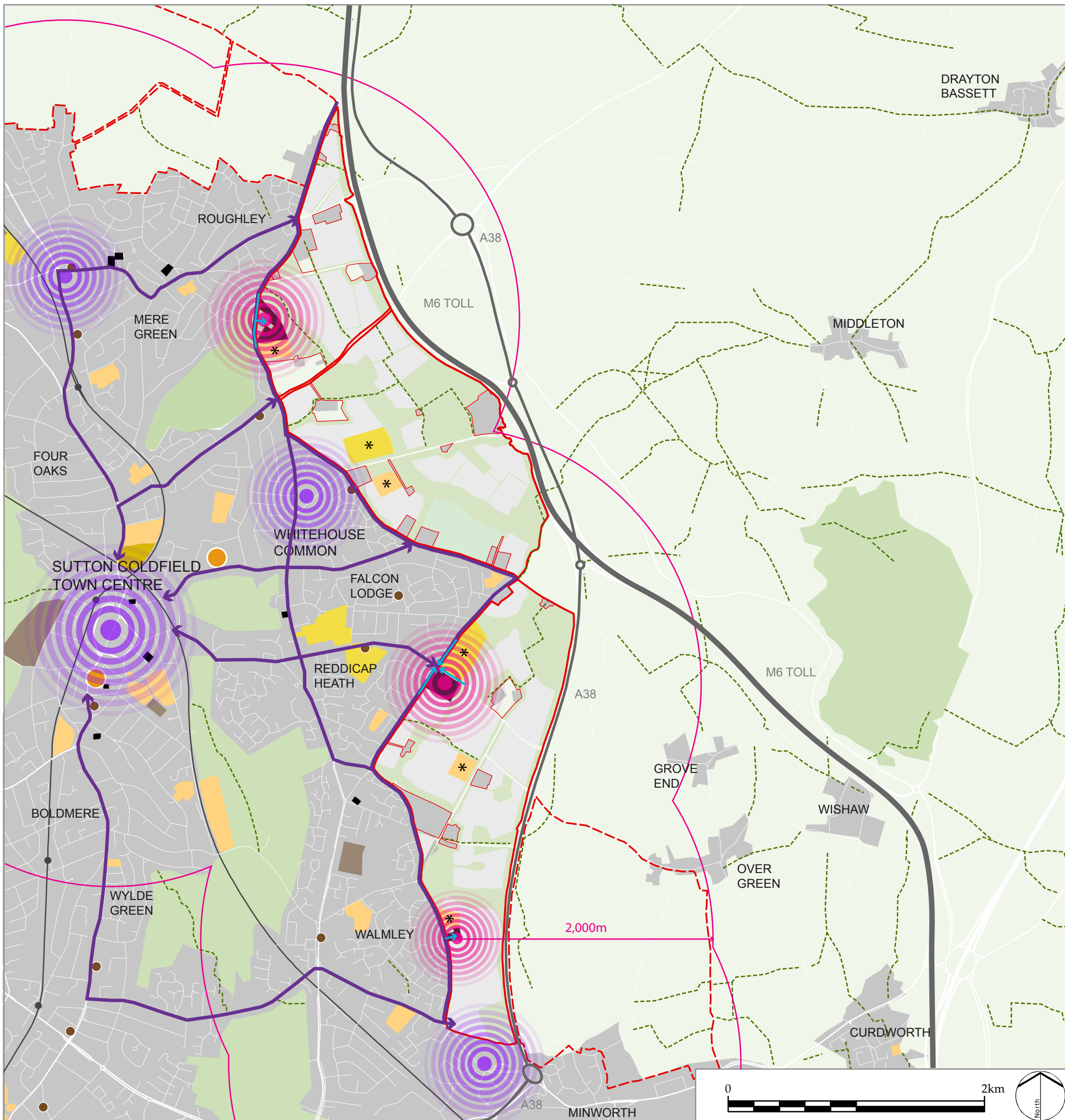
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SITE APPRAISAL AND DEVELOPMENT POTENTIAL

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Access to Social Infrastructure

Figure. 13

DWG. NO. 3758_FP008



- | | | | | | | | |
|--|--|--|---|--|--|--|-----------------------------------|
| | Area boundary (B+C) | | Major highways adjacent to the site | | Proposed local centre to include potential facilities such as small shops, post office, GP, places of worship and community facilities | | Existing hospitals |
| | Other areas forming part of the Green Belt eastern arc | | Further education | | Main routes between sites and Sutton Coldfield town centre | | Existing GPs/ NHS facilities |
| | Retained property within the site boundary | | Secondary schools (* indicating proposed) | | Access to local centres at interfaces of existing and new neighbourhoods | | Existing places of worship |
| | Existing urban area / settlements / built development | | Primary schools (* indicating proposed) | | 2km distance to centres | | Existing and proposed open spaces |
| | Proposed built development | | Existing centres | | Existing leisure and recreation facilities | | Existing rights of way |

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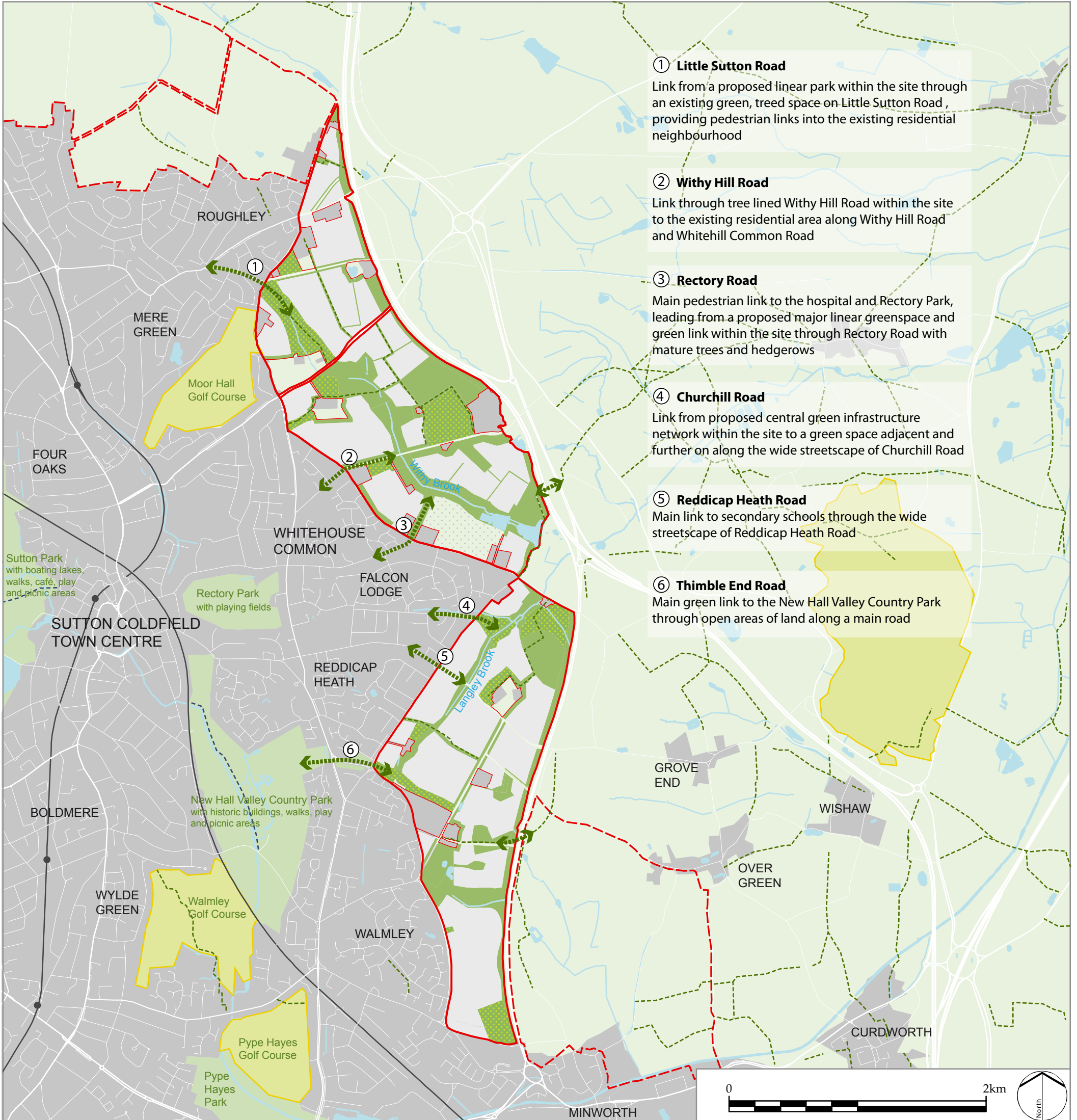
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Figure. 14

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① Little Sutton Road
Link from a proposed linear park within the site through an existing green, treed space on Little Sutton Road, providing pedestrian links into the existing residential neighbourhood

② Withy Hill Road
Link through tree lined Withy Hill Road within the site to the existing residential area along Withy Hill Road and Whitehill Common Road

③ Rectory Road
Main pedestrian link to the hospital and Rectory Park, leading from a proposed major linear greenspace and green link within the site through Rectory Road with mature trees and hedgerows

④ Churchill Road
Link from proposed central green infrastructure network within the site to a green space adjacent and further on along the wide streetscape of Churchill Road

⑤ Reddicap Heath Road
Main link to secondary schools through the wide streetscape of Reddicap Heath Road

⑥ Thimble End Road
Main green link to the New Hall Valley Country Park through open areas of land along a main road

	Area boundary (B+C)		Proposed built development		Proposed public open space
	Other areas forming part of the Green Belt eastern arc		Existing open space/surrounding countryside		Proposed cemetery extension
	Retained property within the site boundary		Existing recreation / sports areas		Proposed pedestrian and cycle links to surrounding settlement and countryside
	Existing urban area / settlements / built development		Existing golfcourses		Existing national cycle network
			Existing watercourses		Proposed strategic open space

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Figure. 15

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