

MATTER E: GREEN BELT POLICY & THE LANGLEY SUE STATEMENT BY SAVILLS ON BEHALF OF TAYLOR WIMPEY SEPTEMBER 2014

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

1. Taylor Wimpey supports the removal of the Langley SUE (Area C) from the Green Belt, in accordance with the revised Green Belt boundaries shown on the Policies Map, for allocation



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

4. Birmingham City Council (BCC) accepts that not all of its objectively assessed housing need can be accommodated in the existing urban area, as informed by the 2013 Birmingham SHLAA, and therefore that it needs to look to Green Belt within its administrative boundary to seek to accommodate more of its need because the only remaining - land within its administrative boundary is in the Green Belt. Taylor Wimpey notes that BCC states at paragraph 5.67 of the Plan that it considers that this set of circumstances provides ju



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



12. Taylor Wimpey also wishes to highlight that paragraph 5.4.3 of the Submission Plan Sustainability Appraisal (June 2014) acknowledges that the overall sustainability effects in relation to the Langley SUE allocation (Policy GA5) are likely to be positive in the context of



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

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

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

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

19. Taylor Wimpey is part of the Langley SUE Consortium and has made general comments onse.

GA5 Requirements

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



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

22. Taylor Wimpey still considers that a requirement to apply an average density of 40dph across the Langley SUE based on Policy TP29 to maximise land use and development potential would not be appropriate and would be contrary to the Policy GA5 focus on the provision of family housing. Furthermore, Taylor Wimpey invites the Inspector to view the existing residential areas in the vicinity of the Langley SUE in terms of density, character and housing typologies. This will demonstrate that the established Sutton Coldfield / Walmley mature 1(C)-1hotes21 00s4f2s35h acLang(n)-177(P b1 357TBT d 108.)-3(e)-57(ha)-7(v)6(e) §93.82 Tm[r)-3(ec)-3(en)



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

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

Supplementary Planning Document (SPD)

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

housing supply for the next 5 years.

