

# BLACK COUNTRY CORE STRATEGY

## ISSUES AND OPTIONS REPORT CONSULTATION

**Land at Tipton Road and Setton Drive,  
Woodsetton / Sedgley**

CJZ Design Limited (on behalf of the landowners)

SLR Ref: 416.07553.00002  
Version No: FINAL  
September 2017



## BASIS OF REPORT

This document has been prepared by SLR Consulting Limited with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with CJZ Design Ltd (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

## CONTENTS

<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>2.0</b>	<b>INTRODUCTION TO BLACK COUNTRY CORE STRATEGY ISSUES AND OPTIONS REVIEW .....</b>	<b>2</b>
2.1	Other Plans .....	2
2.2	Consultation and Call for Sites Process .....	3
<b>3.0</b>	<b>THE BLACK COUNTRY TODAY- THE EXISTING STRATEGY .....</b>	<b>4</b>
<b>4.0</b>	<b>THE STRATEGIC CHALLENGES AND OPPORTUNITIES.....</b>	<b>5</b>
4.1	Key Issue 1- Updating the Evidence Base.....	5
4.2	Key Issue 2- Meeting the Housing Needs of a Growing Population .....	5
4.3	Key Issue 3- Supporting a Resurgent Economy .....	7
4.4	Key Issue 6- Reviewing the Role and Extent of the Green Belt .....	7
4.5	Key Issue 9- Working Effectively with Neighbours.....	8
4.6	Section 3 – Key Issues Overview .....	8
<b>5.0</b>	<b>REVIEWING THE STRATEGY TO MEET NEW CHALLENGES AND OPPORTUNITIES .....</b>	<b>9</b>
<b>6.0</b>	<b>DELIVERING GROWTH- INFRASTRUCTURE AND VIABILITY .....</b>	<b>15</b>
<b>7.0</b>	<b>REVIEW OF EXISTING CORE STRATEGY POLICIES AND PROPOSALS .....</b>	<b>18</b>
7.1	Policy Area A- Health and Wellbeing.....	18
7.2	Policy Area B- Creating Sustainable Communities in the Black Country .....	18
7.2.1	Policy HOU1- Housing Land Supply .....	18
7.2.2	Policy HOU2- Housing Density, Type and Accessibility.....	20
7.2.3	Policy HOU3- Affordable Housing.....	21
7.2.4	Policy HOU4- Accommodation for Gypsies, Travellers and Travelling Showpeople.....	22
7.2.5	Policy HOU5- Education and Health Care Facilities .....	23
7.3	Policy Area C- The Black Country Economy.....	23
7.3.1	Policy DEL2- Managing the Balance between Employment Land and Housing.....	23
7.3.2	Policy EMP1- Providing for Economic Growth and Jobs.....	23
7.3.3	Policy EMP2- Strategic High Quality Employment Land and Policy EMP3- Local Quality Employment Land .....	24
7.3.4	Policy EMP4- Maintaining a Supply of Readily Available Employment Land.....	24
7.3.5	Policy EMP5- Improving Access to the Labour Market.....	24
7.3.6	Policy EMP6- Cultural Facilities and the Visitor Economy .....	24
7.4	Policy Area D- The Black Country Centres.....	25
7.4.1	Policy CEN2: Hierarchy of Centres.....	25

7.4.2	Policy CEN3: Growth in the Strategic Centres .....	25
7.4.3	Policy CEN4: Regeneration of Town Centres .....	26
7.4.4	Policy CEN5: District and Local Centres.....	27
7.4.5	Policy CEN6: Meeting Local Needs for Shopping and Services .....	28
7.4.6	Policy CEN7: Controlling Out-of-Centre Development.....	28
7.4.7	Policy CEN8: Car Parking in Centres .....	29
7.5	Policy Area E- The Black Country Transport Network .....	29
7.5.1	Policy CSP5- Transport Strategy.....	29
7.5.2	Policy TRAN1- Priorities for the Development of the Transport Network .....	30
7.5.3	Policy TRAN2- Managing Transport Impacts of New Development .....	30
7.5.4	Policy TRAN3- The Efficient Movement of Freight .....	30
7.5.5	Policy TRAN4- Creating Coherent Networks for Cycling and Walking.....	30
7.5.6	Policy TRAN5- Influencing the Demand for Travel and Travel Choices .....	30
7.6	Policy Area F- The Black Country Environment .....	31
7.6.1	Policy ENV1- Nature Conservation .....	31
7.6.2	Policy ENV2- Historic Character and Local Distinctiveness .....	31
7.6.3	Policy ENV3- Design Quality .....	32
7.6.4	Policy ENV4- Canals .....	33
7.6.5	Policy ENV5- Flood Risk, Sustainable Drainage (SuDS) and Urban Heat Island Effects.....	33
7.6.6	Policy ENV6- Open Space, Sport and Recreation.....	33
7.6.7	Policy ENV7- Renewable Energy .....	34
7.6.8	Policy ENV8- Air Quality .....	34
7.7	Policy Area G- Waste.....	34
7.8	Policy Area H- Minerals .....	35
7.9	Policy Area J- Growth Network Detailed Proposals.....	36
7.10	Policy Area K- Monitoring and Additional Policies.....	37

## 1.0 Introduction

This document has been prepared by SLR Consulting Limited ('SLR') on behalf of our Client(s), CJZ Design Limited who represents the landowners; Mrs Johnson, Mr Hill, Mr Rogerson and Messrs Hughes/Hawkins, with regard to the Black Country Core Strategy Issues and Options Report which is currently out for consultation until 8<sup>th</sup> September 2017.

SLR has undertaken a detailed review of the content of the published Issues and Options Report and sought to directly respond to the 119 questions contained within the consultation document. Notwithstanding, given our Client's active interest in a landholding at Tipton Road and Setton Drive, Woodsetton/Sedgley, SLR has also submitted a 'promotional document' in support of these representations which clearly detail our considerations regarding the site. As you will note, this site is being promoted for residential development to meet the housing needs of the Housing Market Area which covers the Black Country Core Strategy area, including Dudley Metropolitan Borough Council.

The review of the Issues and Options document, associated commentary and relevant conclusions is set out below.

## 2.0 Introduction to Black Country Core Strategy Issues and Options Review

**Question 1 – Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? Yes/No; If not, what do you think should be the scope of the review?**

**Answer:** Yes

**Detail:** As stated, national planning guidance suggests that ‘most Local Plans are likely to require updating in whole or in part at least every five years’ and as the Black Country Core Strategy covers the period from 2006-2026 and it was formally adopted in 2011. As such, given these timescales, the Core Strategy it is now due for review to remain relevant and to meet the needs of the Black Country area now and into the future.

In addition, although the extant Core Strategy has been perceived to be successful in the past six years, a review will ensure that it continues to support the delivery of housing, industrial and retail growth of the area, whilst protecting the environment.

SLR would agree that the most appropriate strategy is for a comprehensive review of the extant Core Strategy and its associated evidence base. This would provide an opportunity to continue the ethos and good work of the extant Core Strategy and ensure continuity of the Black Country vision going forward, including accounting for any uplift housing projection levels for the wider Housing Market Area.

Notwithstanding, any such review must be based on robust evidence. As such, SLR would emphasise that a comprehensive review of evidence base documents relating to the following topics should take place as part of the Core Strategy review:

- Green Belt;
- Strategic Housing Market;
- Strategic Housing Land Availability;
- Population and Household Forecasts;
- Retail Study and Centres Healthcheck;
- Infrastructure Deliverability & Planning Delivery;
- Employment Land;
- Minerals and Waste;
- Strategic Flood Risk;
- Sustainability; and
- Transport.

### 2.1 Other Plans

SLR are fully supportive of the Black Country Core Strategy taking into account other strategic plans and strategies, such as the Black Country and West Midlands Combined Authority Strategic Economic Plans, as well as other local authorities working with the Black Country to meet the needs and aspirations of the Plan going forward. This will be especially pertinent for meeting the needs of the wider Housing Market Area and potentially allocating sufficient sites for both this plan period and beyond.

Indeed, SLR fully supports the statement within paragraph 1.19 of the document that *“it will not be possible to accommodate all future development needs within the urban area. Therefore, an examination of the potential for additional development land outside the existing urban area... will need to take place as part of the Core Strategy Review.”*

This is particularly pertinent given the generally tightly constrained boundary to the Black Country urban areas which are preceded by the exhaustive surrounding Green Belt. A review of the Green Belt is therefore imperative.

## 2.2 Consultation and Call for Sites Process

SLR understands that not all of the questions contained within the Core Strategy Issues and Options Review consultation need be answered. This document has sought to be concise in the areas that any such comments are raised.

However, in accordance with paragraph 1.25 of the document, SLR has also completed a ‘call for sites’ form on behalf of our client(s). This submission seeks to promote the site at Tipton Road and Setton Drive, Woodsetton/Sedgley for residential development. In addition, a Land Promotion Document has been prepared and is submitted to provide additional detail relating to the site.

This site is located within the authoritative bounds of Dudley Metropolitan Borough Council and therefore the Black Country Core Strategy area. We trust that this submission assists with the consideration of the Tipton Road and Setton Drive, Woodsetton/Sedgley site and its potential release from the Green Belt.

However, please do not hesitate to contact SLR should you have any queries or require any further information relating to the promotion site. We would welcome the opportunity to hold a meeting with representatives from the authority to discuss this site in more detail, at the appropriate time.

---

## 3.0 The Black Country Today- The Existing Strategy

This section of the Core Strategy Issues and Options Review consultation details the geographic makeup of the Black Country, its context as a sub-region and the key vision and aims of the Strategy itself. As such, there is little to comment on in this initial element of the document and no direct questions asking for views on its content.

Notwithstanding, SLR is fully aware of the current delivery challenge within the Black Country, with the large pipeline of major housing sites being concentrated within the growth network. Delivery within the growth network has been less than anticipated with a number of windfall sites having come forward outside of this area. It is of little surprise that *“there is not as much surplus employment land suitable for housing as anticipated. This is partly because the economy has strengthened and local firms are more robust than expected and partly because sites are more affected by constraints than expected”* (paragraph 2.5). As such, SLR is aware that the Black Country is currently 3,000 homes behind the extant Core Strategy target (paragraph 2.9) and that many of the pipeline of housing sites allocated are subject to multiple constraints which will require financial assistance to bring forward (paragraph 2.10). Ultimately, some of these sites will not deliver housing numbers even in the longer term.

SLR agrees with the concerns detailed within paragraph 2.11 that *“This approach brings issues of viability due to the costs of land assembly, business relocation and land remediation. Significant amounts of external funding are now available through the Black Country LEP and the West Midlands Combined Authority... However, this is not sufficient to cover the costs of compulsory purchase, which may be necessary on many sites to ensure delivery by 2026 and would significantly increase gap funding costs to around £1.5m per ha... if the delivery period for these sites was extended from 2026 to 2036, compulsory purchase should not be required.”*

In light of the above, SLR would suggest that a comprehensive review of available housing sites should take place to fill this shortfall in the immediate future and thereby allow more complex brownfield employment sites to be brought forward in the longer term.



---

## 4.0 The Strategic Challenges and Opportunities

### 4.1 Key Issue 1- Updating the Evidence Base

**Question 2 – Do you think that the key evidence set out in Table 1 is sufficient to support the key stages of the Core Strategy review? Yes/No; If not, what further evidence is required and, if there are any particular issues that should be taken into account in considering development on any particular sites or in any particular areas, please provide details.**

**Answer:** No

**Detail:** Whilst the evidence set out in Table 1 is comprehensive, SLR would question whether the content and findings of these documents would need to be updated following the completion of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study which was commenced in March 2017 and due to be completed in September 2017. This report could ultimately require for the updating of the following key evidence base documents relating to housing in the sub-region:

- Greater Birmingham and Solihull LEP / Black Country Authorities Strategic Housing Needs Study (SHNS) Stage 3 Report (PBA) – **completed August 2015;**
- Strategic Housing Market Assessment for Black Country and South Staffordshire including Gypsy and Traveller needs (PBA) – **completed February 2017;**
- Strategic Housing Land Availability Assessments for Dudley, Sandwell, Walsall and Wolverhampton (Local authorities) – **completed 2016/2017;** and
- Housing Background Report (Local authorities) – **completed May 2017.**

In addition, SLR would suggest that a comprehensive Black Country Green Belt Review needs to take place to release further sites within the Housing Market Area. It is understood that this document is currently being scoped with an intention to be completed by mid-2018. SLR will seek to submit further representations to this document on behalf of our clients at the appropriate time.

As stated, it is important that the key documents are updated when required and the review is based on up-to-date and robust evidence. With this in mind, SLR would encourage the Black Country to ensure that a comprehensive and coherent approach is taken to the Call for Sites, any Strategic Housing Land Availability Assessments (SHLAAs) and Green Belt Reviews going forward.

Without this housing need and delivery will not be met and the existing shortfall will continue to increase, leading to pressure to release unallocated land throughout the Black Country region. SLR therefore urges the Black Country to allocate and safeguard sufficient sites for housing needs beyond the forthcoming plan period.

### 4.2 Key Issue 2- Meeting the Housing Needs of a Growing Population

**Question 3 – Do you agree that the housing need identified for the Black Country over the period 2014-36 in the SHMA, and the anticipated amount of supply, are appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.**

**Answer:** Yes

**Detail:** SLR supports the findings of the SHMA that there is a housing shortfall of 38,000 homes based on Birmingham's needs up until 2031 that cannot be accommodated within the City, even allowing for the proposals in the Plan to utilise land within the Green Belt (paragraph 3.10). The Strategic Housing Network Study (SHNS, completed in 2015) considered scenarios for distributing this housing shortfall. The study concluded that the supply of brownfield land across the HMA is insufficient and that the majority of this

---

shortfall will need to be met on greenfield sites, including green belt outside Birmingham's administrative area (paragraph 3.11).

SLR supports the premise that through the duty to cooperate there is a mechanism in place to explore new housing provision beyond the HMA where there are clear migration and commuting links. Notwithstanding, it is clear that there are opportunities to accommodate some of this shortfall on Green Belt sites within the Black Country that no longer meet the necessary purposes detailed within the NPPF.

SLR supports the findings of the Strategic Housing Market Assessment (SHMA) completed in 2017 which identifies that the Objectively Assessed Housing Need ('OAN') for the Black Country over the period 2014-36 is 78,190 homes. SLR also supports that the OAN has made an allowance for a national backlog which has arisen over the period 2011-14 where the annual need for housing was greater than that planned for in the existing Core Strategy.

It is noted that paragraph 3.13 identifies that *"The SHMA may be updated during the review as and when new Government projections and guidance become available and housing supply information changes"*. SLR encourages the authority to undertake this update as swiftly as possible following publication of such information.

Given the above, SLR also considers that a comprehensive review of the Green Belt should be undertaken for both the Black Country area and the adjoining local authorities within the HMA to ensure that sufficient housing sites are either allocated or safeguarded for both the forthcoming and subsequent plan periods. This is especially pertinent given that the SHMA has already accounted for a significant backlog and that these figures are likely to be increased once the Government projections and guidance are updated.

In this respect, SLR duly requests that the Black Country Core Strategy Review consider our Client's site for suitability for release from the Green Belt and either allocation in the short term or a longer term safeguarding. The site, which is 7.75 hectares, could be brought forward as a strategic allocation which could go toward meeting the housing need for the HMA.

With regard to any Green Belt Review, this should be comprehensive in its remit, covering both the Black Country area and Green Belt areas immediately adjoining the settlement boundaries. On this point, it should be noted that the NPPF states that when local authorities are reviewing established Green Belt boundaries they should take account of the need to promote sustainable patterns of development, channelling development towards urban areas inside the Green Belt boundary (NPPF paragraph 84). Indeed, paragraph 85 of the NPPF identifies that when defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

We would encourage any comprehensive Green Belt Review to accord with the thrust of these criteria defined within paragraph 85 of the NPPF.

---

Given that no Green Belt Review has been undertaken within the Dudley Metropolitan Borough Council area since its designation in the late 1970s, considerable weight should be given to releasing Green Belt sites within the urban area. Such urban sites are located in closer proximity to infrastructure and are considered more sustainable than other sites further afield.

### 4.3 Key Issue 3- Supporting a Resurgent Economy

**Question 4 – Do you consider the employment land requirement identified for the Black Country up to 2036 in the EDNA is appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.**

**Answer:** Yes

**Detail:** The Economic Development Needs Assessment (EDNA) has been developed for the area during 2016/2017 and it is highlighted that 90-170 ha of land in South Staffordshire (including the proposed West Midlands Interchange) has the potential to contribute towards meeting Black Country needs for employment land. Notwithstanding, SLR would encourage any future SHMA to duly consider the needs of the EDNA in terms of both retaining existing employment land and ensuring that sufficient housing land is provided to meet the likely increase in population within the HMA as a result of any increase in economic activity.

### 4.4 Key Issue 6- Reviewing the Role and Extent of the Green Belt

**Question 5 - Do you agree with the proposed approach to the Black Country Green Belt Review? Yes/No; If not, what additional work do you think is necessary?**

**Answer:** Yes

**Detail:** It is identified within paragraph 3.41 that there has not been a Strategic Green Belt Review in the Black Country since the designation of the existing green belt in 1970. As such, SLR welcomes the approach to reviewing the Green Belt within the Black Country to ensure that urban sites which are suitable, available and deliverable are identified for release.

As highlighted in the Issues and Options document, the NPPF identifies that Green Belt boundaries should only be reviewed whilst conducting a Local Plan review and in exceptional circumstances. It is considered that the need 'to accommodate unmet housing needs', especially given the backlog experienced between 2011-2014 and the likely findings of the Greater Birmingham and Black Country HMA Strategic Growth Study, such a Green Belt Review is now entirely appropriate within both the Black Country and the wider HMA.

As outlined above, SLR duly requests that the Black Country Core Strategy Review consider our Client's site for suitability for release from the Green Belt and either allocation in the short term or a longer term safeguarding. Given that the site can form a strategic allocation, it has the ability to provide a significant quantum of development which could go toward meeting the housing need for the HMA.

With regard to any Green Belt Review, this should be comprehensive in its remit, covering both the Black Country area and Green Belt areas immediately adjoining the settlement boundaries. On this point, it should be noted that the NPPF states that when local authorities are reviewing established Green Belt boundaries they should take account of the need to promote sustainable patterns of development, channelling development towards urban areas inside the Green Belt boundary (NPPF paragraph 84). Indeed, paragraph 85 of the NPPF identifies that when defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;

- 
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
  - make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
  - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
  - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

We would encourage any comprehensive Green Belt Review to accord with the thrust of these criteria defined within paragraph 85 of the NPPF.

Given that no Green Belt Review has been undertaken within the Dudley Metropolitan Borough Council area since its designation in the late 1970s, considerable weight should be given to releasing Green Belt sites within the urban area. Such urban sites are located in closer proximity to infrastructure and are considered more sustainable than other sites further afield.

## 4.5 Key Issue 9- Working Effectively with Neighbours

SLR supports the use of collaborative working with adjoining local authorities, especially in meeting the housing needs of the wider HMA and the completion of a suitable and comprehensive Green Belt Review. The strategic priorities must be dealt with across local authority boundaries given the constrained nature of the Black Country and the significant levels of potentially suitable, available and deliverable Green Belt sites that could be released.

## 4.6 Section 3 – Key Issues Overview

**Question 6 – Do you agree that the key issues set out in Part 3 are the key issues that need to be taken into account through the Core Strategy Review? Yes/No; If not, what other key issues should be taken into account?**

**Answer:** Yes

**Detail:** SLR agrees with the key issues identified within Section 3 of the Core Strategy Issues and Options Report. SLR would, however, suggest that weighting needs to be applied to those key issues which are considered to be more pressing in terms of growth and investment for the Black Country Core Strategy area. Indeed, SLR would suggest that the completion of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study is a key priority which would subsequently likely require a comprehensive review of both housing needs within the HMA and for the completion of a comprehensive Green Belt Review in collaboration with adjoining local authorities.

---

## 5.0 Reviewing the Strategy to Meet New Challenges and Opportunities

**Question 7 - Do you think that the Core Strategy vision and sustainability principles remain appropriate? Yes/No; If not, what alternatives would you suggest?**

**Answer:** Yes

**Detail:** SLR agrees with the overall mantra of the Core Strategy vision and sustainability principals identified within Sections 4.3-4.5 of the Issues and Options document. Notwithstanding, as outlined above, SLR is of the view that there needs to be a comprehensive Green Belt Review both within the Black Country HMA and for adjoining local authority areas.

It is contended that any such Green Belt Review, Call for Sites and any subsequent SHLAA will identify potential housing sites that are more suitable, available and deliverable than those previously considered under the extant Core Strategy. These sites, whilst located within the Green Belt, may provide a more sustainable spatial and strategic solution to the housing needs of the HMA than at present.

**Question 8 - Do you think that the Core Strategy spatial objectives remain appropriate? Yes/No; If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?**

**Answer:** No

**Detail:** Whilst SLR agrees with the appropriateness of the majority of the spatial objectives, there is a need to consider rewording objective 3 to recognise that land will need to be released from the Green Belt to meet the housing need of the HMA both for the forthcoming Core Strategy and beyond.

**Question 9 – Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network? Yes/No; If not, what changes do you think should be made to Policies CSP1 and CSP2 in response to new challenges and opportunities?**

**Answer:** Yes

**Detail:** SLR agrees that Policy CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network. SLR would suggest that the policies should be updated to reflect the findings of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study and any findings it may have that influence both housing needs within the HMA and the potential release of Green Belt land.

With regard to Policy CSP2, clear reference should be made to need for a comprehensive Green Belt Review, the release of sites for housing allocation and the safeguarding of sites for future needs beyond the plan period.

**Question 10 – In continuing to promote growth within the Growth Network, is there a need to amend the boundaries of any of the Regeneration Corridors in the existing Core Strategy? Yes/No; If so, which boundaries and why?**

**Answer:** No

**Detail:** There is no requirement to update the boundaries of the Regeneration Corridors as they are fit for purpose and meet their intended purpose of encouraging growth within these areas. Notwithstanding, it is appreciated that evidence currently suggests that 22-25,000 new homes and 300ha of new employment land

---

will be required outwith of these Regeneration Corridors, especially given the likely increase cost for releasing, remediating and developing brownfield sites within these areas. Indeed, the Issues and Options document has already identified that Green Belt land will need to be released to meet housing need up to 2036.

SLR would suggest that there are a number of Green Belt sites that would be suitable, available and deliverable that could assist in meeting housing needs for the HMA in the longer term. As such, a comprehensive Green Belt Review must be undertaken to ensure that any sites identified are the most appropriate and sustainable solutions to meeting housing need going forward.

***Question 11a – Do you support Strategic Option 1A? Yes/No; If yes, please explain why. If no, do you support Option 1B? Yes/No; If yes, please explain why. If you support the release of further employment land for housing, what should the characteristics of these employment areas be?***

**Answer:** Yes

**Detail:** SLR supports the premise of the of Option 1A provided that the strategy is updated to reflect the findings of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study and any findings it may have that influence both housing needs within the HMA and the potential release of Green Belt land. SLR does, however, view that it would be more sustainable to accommodate housing allocations within the Green Belt rather than larger employment land sites.

Finally, consideration must be given to the deliverability of larger housing sites within the Growth Networks and Regeneration Corridors, especially given the constrained nature of these sites and their longer term timescales for release. The Core Strategy has already identified that there have been significant delays to bringing forward such sites given the costs of land assembly and remediation. As such, there will need to be an interim solution to meet short term housing need whilst the larger strategic brownfield sites are being released for development.

***Question 11b – Are there any current employment areas that might be considered suitable for redevelopment to housing? Yes/No; Please submit specific sites through the ‘call for sites’ form.***

**Answer:** No

**Detail:** The Core Strategy and its evidence base has already identified that there is a significant demand for employment sites within the Black Country urban area. As such, the continued loss of such strategic employment land provision would be detrimental to the Strategic Growth of the Black Country, whilst housing could be more suitable for location outside of the Growth Network.

***Question 12a – Do you support Spatial Option H1? Yes/No; What criteria should be used to select suitable sites? e.g. ability to create a defensible new green belt boundary, size, access to existing residential services.***

**Answer:** Yes

**Detail:** SLR supports the release of both small scale and medium scale housing sites within the Green Belt. As per all such potential sites for Green Belt release, these should be considered on a case-by-case scenario within a comprehensive Green Belt Review and subsequent Strategic Housing Land Availability Assessment covering both the Black Country Core Strategy Area and the wider HMA.

We would recommend that the criteria defined within the NPPF be utilised to undertake any such reviews for potential release from the Green Belt. Indeed, paragraph 85 of the NPPF identifies that when defining boundaries, local planning authorities should:

- 
- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
  - not include land which it is unnecessary to keep permanently open;
  - where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
  - make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
  - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
  - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

We would encourage any comprehensive Green Belt Review to accord with the thrust of these criteria defined within paragraph 85 of the NPPF.

***Question 12b – Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details (please submit specific sites through the 'call for sites' form).***

**Answer:** Yes

**Detail:** On behalf of our client(s), CJZ Design Limited who represents the landowners; Mrs Johnson, Mr Hill, Mr Rogerson and Messrs Hughes/Hawkins, SLR has prepared a Promotional Document reviewing the development opportunities associated with their site at Tipton Road and Setton Drive, Woodsetton / Sedgley. This document has been submitted for your reference and should be read in conjunction with these representations.

As outlined within the document, the site provides a clear opportunity for a medium scale housing site release from the designated Green Belt. Its location within the urban area of Dudley, its lack of development constraints and the functionality of the Green Belt indicates that this site is suitable, available and deliverable in both the short and longer term. SLR would welcome the opportunity to discuss this site with you in more detail.

***Question 13a – Do you support Spatial Option H2? Yes/No; What should the characteristics of Sustainable Urban Areas (SUEs) be? e.g. minimum/ maximum size, mix of uses, mix of housing types, accessibility to other areas. What criteria should be used to select suitable sites? e.g. proximity to a rail station, availability of existing infrastructure, easy access to jobs, potential to support existing settlements / services, proximity to the existing growth network, potential to support urban regeneration.***

**Answer:** Yes

**Detail:** Our client is promoting a site at Tipton Road and Setton Drive, Woodsetton / Sedgley, which lies within the authoritative bounds of Dudley Metropolitan Borough Council. Whilst this site would not form an SUE, it does represent an opportunity to provide a housing site within the urban area that could assist in meeting housing needs for the Black Country and wider HMA.

SLR would suggest that the minimum size for a Sustainable Urban Extension under Option H2 would need to be in the region of 500 units. The mix of uses, housing types and its overall accessibility would need to be considered on a case-by-case scenario dependent upon the findings of the SHMA and the sites location in proximity to existing infrastructure.

---

**Question 13b – What infrastructure do you think would be needed for different sizes of SUEs?**

**Answer:** N/A

**Detail:** This will be entirely dependent upon the size and location of the SUE in relation to the existing infrastructure in the locality. Consideration should be given to highways and transport, utilities and communication, education and public services (including schools, medical, libraries and shops etc.), sport and open space provision, environment and green infrastructure, and waste. Again, much of this provision can be dealt with as a result of the planning application process and associated legal agreements (CIL and S.106 etc.).

**Question 13c - Are there any potential locations that should be considered for SUEs (please submit through the 'call for sites' form) and what infrastructure would be required to support these?**

**Answer:** Yes

**Detail:** On behalf of our client(s), CJZ Design Limited who represents the landowners; Mrs Johnson, Mr Hill, Mr Rogerson and Messrs Hughes/Hawkins, SLR has prepared a Promotional Document reviewing the development opportunities associated with their site at Tipton Road and Setton Drive, Woodsetton / Sedgley. This document has been submitted for your reference.

Whilst this site would not form an SUE, it does represent an opportunity to provide a housing site within the urban area that could assist in meeting housing needs for the Black Country and wider HMA. Its location within the urban area of Dudley ensures that it is a more sustainable location than other sites located further afield. SLR would welcome the opportunity to discuss this site with you in more detail.

**Question 13d - Do you think that the Core Strategy should set out detailed guidance for the development of SUEs (e.g. type and tenure of housing, specific infrastructure required), rather than details being determined at a local level in light of local policies? Yes/No; Any further comments?**

**Answer:** No

**Detail:** Bringing forward detailed guidance within the Core Strategy for the development of SUEs would lead to the development not responding to its local circumstances; a homogenous set of guidance is considered unlikely to be of benefit to promoting the levels of housing delivery required within the HMA.

Were guidance to be contained within the Core Strategy, this should be kept at a high level with minimum constraints placed upon the deliverability of a scheme. It should be duly recognised that there is a shortfall of housing provision within the HMA and that increasing the level of guidance upon deliverability will likely result in unnecessary burdens being placed upon the developer when such requirements can be dealt with under existing mechanisms within the planning application process.

**Question 14 – Do you think there are any other deliverable and sustainable Housing Spatial Options? Yes/No; If yes, please provide details.**

**Answer:** Yes

**Detail:** SLR would recommend that a mixture of both options H1 and H2 are considered to allocate and bring forward sufficient allocations and subsequent safeguarded sites not only for this plan period but also beyond. This will need to be carefully considered within any subsequent comprehensive Green Belt Review that is undertaken as part of the evidence base, to ensure sufficient land is released and/or safeguarded.



---

**Question 15a - If all housing need cannot be met within the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA? Yes/No; What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?**

**Answer:** Yes

**Detail:** As identified within the Core Strategy Issues and Options Report, not all of the housing need can be accommodated within the Black Country even with significant Green Belt release within this area. As such, it is vital for the Black Country to enter into cross boundary collaboration with adjoining local planning authorities to identify suitable sites adjoining the urban fringe which could be brought forward to meet the needs of the wider HMA both for this plan period and beyond. As outlined above, any comprehensive Green Belt Review will also need to be undertaken on a cross boundary basis to ensure that the sites identified are the most suitable, available and deliverable sites possible to ensure a sustainable approach to housing provision within the wider area.

Notwithstanding, the site at Tipton Road and Setton Drive, Woodsetton / Sedgley represents a clear opportunity to release a Green Belt site within the urban area of Dudley. The urban context of this site and its proximity to a range of local services ensures that it would be a sustainable and suitable release from the Green Belt.

**Question 15b – Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details.**

**Answer:** N/A

**Detail:** SLR does not wish to comment on this question.

**Question 15c - Do you think there are ways to ensure that exporting housing will meet the needs of people who would otherwise live in the Black Country? (e.g. transport improvements, provision of affordable housing, creation of employment opportunities) Yes/No; If yes, please provide details.**

**Answer:** N/A

**Detail:** SLR does not wish to comment on this question.

**Question 16 – Do you support Spatial Option E1? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites? (e.g. quick motorway access)**

**Answer:** Yes

**Detail:** SLR would support the extension of the existing employment areas on the urban fringe into the Green Belt. Such extensions should be duly considered within any forthcoming comprehensive Green Belt Review.

Notwithstanding, concentrating employment in the urban area should be considered preferable to housing, as housing is more easily developed in urban or edge of urban areas which are more responsive to such uses in terms of transport links and services. This is especially true for existing employment sites if they have subsequently become functional and demand necessitates their retention.

---

**Question 17 – Do you support Spatial Option E2? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites e.g. quick motorway access, good sustainable transport links?**

**Answer:** No

**Detail:** SLR would not support the provision of new freestanding employment sites in the Green Belt. Whilst such sites should be duly considered within any forthcoming comprehensive Green Belt Review, release of Green Belt land should be primarily for housing.

**Question 18 – Do you support Spatial Option E3? Yes/No; What type of sites are needed to meet the needs of industry and what criteria should be used to select sites? (e.g. quick motorway access)**

**Answer:** Yes

**Detail:** SLR would support the provision of new employment land within Sustainable Urban Extensions in the Green Belt. Such sites should be duly considered within any forthcoming comprehensive Green Belt Review.

**Question 19a – Do you support Spatial Option E4? Yes/No; Any further comments?**

**Answer:** Yes

**Detail:** SLR would support the provision of new employment land within Sustainable Urban Extensions in the Green Belt. Such sites should be duly considered within any forthcoming comprehensive Green Belt Review.

**Question 19b - Should any factors be taken into account in an assessment of the opportunities? Yes/No; If yes, what should they be? (e.g. quick motorway access, strong transport links with the Black Country, good sustainable transport links with the Black Country)**

**Answer:** Yes

**Detail:** Any such employment allocations should be in close proximity to a variety of transport links and, potentially, close to the commuter belts that many of the workforce are travelling from.

**Question 20 - Do you think there are any other deliverable and sustainable Employment Land Spatial Options? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR does not wish to comment on this question.

---

## 6.0 Delivering Growth- Infrastructure and Viability

**Question 21 – Do you think that changes are required to Policy DEL1 to ensure it covers both development within the existing urban area and any within the Green Belt? Yes/No; If yes, please provide details.**

**Answer:** Yes

**Detail:** SLR considers that Policy DEL1 should be updated to accommodate the necessary infrastructure requirements to allow for the release of sites within the Green Belt. Much of these requirements can be assessed during the completion of the Green Belt Review and subsequent review of housing sites within the Call for Sites and any SHLAA.

**Question 22 – Do you have evidence of a requirement for new social infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.**

**Answer:** No

**Detail:** SLR does not have any evidence at this stage, albeit an Accessibility Plan has been prepared as part of the Promotional Document which identifies existing social infrastructure within walking distance of the promotion site. Releasing urban Green Belt sites will clearly require less social infrastructure than exporting housing out to village locations.

**Question 23 - Do you have evidence of social infrastructure that is no longer needed and where the site could be reallocated for alternative uses? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR does not have any evidence at this stage, albeit an Accessibility Plan has been prepared as part of the Promotional Document which identifies existing social infrastructure within walking distance of the promotion site.

**Question 24- Do you have evidence of pressure being placed on the capacity of current social infrastructure which could be exacerbated by new housing? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR does not have any evidence at this stage, albeit an Accessibility Plan has been prepared as part of the Promotional Document which identifies existing social infrastructure within walking distance of the promotion site.

**Question 25 – Will there be any new social infrastructure requirements necessary to serve large new housing developments? Yes/No; If yes, please explain the type and scale of any new social infrastructure required.**

**Answer:** Yes

**Detail:** SLR does not have any evidence at this stage, albeit an Accessibility Plan has been prepared as part of the Promotional Document which identifies existing social infrastructure within walking distance of the promotion site. As with all large housing developments, pressure will be placed upon existing infrastructure which may require some additional provision.

---

**Question 26 - Do you have any evidence of a requirement for new physical infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.**

**Answer:** No

**Detail:** SLR does not have any evidence at this stage, albeit an Accessibility Plan has been prepared as part of the Promotional Document which identifies existing social infrastructure within walking distance of the promotion site. As with all large housing developments, pressure will be placed upon existing infrastructure which may require some additional provision.

**Question 27 - Do you have evidence of pressure being placed on the capacity of current physical infrastructure which could be exacerbated by new developments? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR does not have any evidence at this stage, albeit the Promotional Document has considered any site specific constraints in determining whether the site is suitable for housing development. As with all large housing developments, pressure will be placed upon existing infrastructure which may require some additional provision.

**Question 28 – Do you think physical infrastructure is necessary to serve large new housing developments? Yes/No; If yes, what type and scale of physical infrastructure is necessary?**

**Answer:** Yes

**Detail:** SLR does not have any evidence at this stage, albeit the Promotional Document has considered any site specific constraints in determining whether the site is suitable for housing development. As with all large housing developments, pressure will be placed upon existing infrastructure which may require some additional provision.

**Question 29 - Do you think there are any other tools or interventions that could be used to ensure enough infrastructure is provided by developments? Yes/No; If yes, please provide details.**

**Answer:** Yes

**Detail:** SLR considers that the existing application process, including CIL and S.106 arrangements, along with any suitable pre-application consultation would be sufficient to ensure that new housing developments provide sufficient infrastructure to support their development.

**Question 30 - Do you have any suggestions around how the strategy can be developed in order to maintain the urban regeneration focus of the Black Country while at the same time bringing forward sites in the green belt? Yes/No; if yes, please provide details.**

**Answer:** Yes

**Detail:** The completion of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study is a key priority which would subsequently likely require a comprehensive review of both housing needs within the HMA and for the completion of a comprehensive Green Belt Review in collaboration with adjoining local authorities. SLR would suggest that the strategy must ensure that due consideration is given to these key evidence base documents.

Whilst development and particularly employment should be focussed within the Black Country, it is critical to deliver enough housing quantity and locational choice to secure/retain/attract the work force required to

---

deliver the objectives. Sensible Green Belt release will ensure locational choice and improve the attractiveness of opportunities in the Black Country.

***Question 31 – Do you think that the right scale and form of funding is available to support the delivery of the Core Strategy review? Yes/No; If no, what alternative sources of funding or delivery mechanisms should be investigated?***

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

---

## 7.0 Review of Existing Core Strategy Policies and Proposals

### 7.1 Policy Area A- Health and Wellbeing

**Question 32 - Do you think that the proposed approach to incorporate health and wellbeing issues in the Core Strategy review is appropriate? Yes/No; If no, please provide details**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 33 – Is there more that the Core Strategy can do to address health and wellbeing issues in the Black Country? Yes/No; If yes, is a new policy needed to address such issues for example?**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 34a - Do you agree that the health and wellbeing impacts of large development proposals should be considered at the Preferred Spatial Option stage of the Core Strategy review through a Health Impact Assessment approach? Yes/No; Any further comments?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 34b - What design features do you think are key to ensuring new development encourages healthy living, which could be assessed through the HIA process?**

**Answer:** N/A

**Detail:** All housing developments should provide the necessary level of open space and play space provision. Should this be agreed to provided off site, the necessary contributions to off-site provision should be made by the applicant at the appropriate time.

### 7.2 Policy Area B- Creating Sustainable Communities in the Black Country

#### 7.2.1 Policy HOU1- Housing Land Supply

**Question 35 - Do you support the proposed approach to housing land supply? Yes/No; If no, please explain why.**

**Answer:** No

**Detail:** This policy needs to be comprehensively updated to meet the housing needs identified within the forthcoming Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study is a key priority which would subsequently likely require a comprehensive review of both housing needs within the HMA and for the completion of a comprehensive Green Belt Review in collaboration with adjoining local authorities. SLR would suggest that clear reference should be made within the Policy regarding the potential release of Green Belt sites within the Black Country and beyond these boundaries within adjoining local planning authorities.

---

SLR supports the findings of the SHMA that there is a housing shortfall of 38,000 homes based on Birmingham's needs up until 2031 that cannot be accommodated within the City, even allowing for the proposals in the Plan to utilise land within the Green Belt (paragraph 3.10). The Strategic Housing Network Study (SHNS, completed in 2015) considered scenarios for distributing this housing shortfall. The study concluded that the supply of brownfield land across the HMA is insufficient and that the majority of this shortfall will need to be met on greenfield sites, including green belt outside Birmingham's administrative area (paragraph 3.11).

SLR supports the findings of the Strategic Housing Market Assessment (SHMA) completed in 2017 which identifies that the Objectively Assessed Housing Need ('OAN') for the Black Country over the period 2014-36 is 78,190 homes. SLR also supports that the OAN has made an allowance for a national backlog which has arisen over the period 2011-14 where the annual need for housing was greater than that planned for in the existing Core Strategy.

It is noted that paragraph 3.13 identifies that *"The SHMA may be updated during the review as and when new Government projections and guidance become available and housing supply information changes"*. SLR encourages the authority to undertake this update as swiftly as possible following publication of such information. Any Green Belt Review should identify enough safeguarded land to ensure subsequent requirements can be met without the need for an early Green Belt Review.

Given the above, SLR also considers that a comprehensive review of the Green Belt should be undertaken for both the Black Country area and the adjoining local authorities within the HMA to ensure that sufficient housing sites are either allocated or safeguarded for both the forthcoming and subsequent plan periods. This is especially pertinent given that the SHMA has already accounted for a significant backlog and that these figures are likely to be increased once the Government projections and guidance are updated.

In this respect, SLR duly requests that the Black Country Core Strategy Review consider our Client's site for suitability for release from the Green Belt and either allocation in the short term or a longer term safeguarding. Given that the site can be brought forward as a strategic allocation which could go toward meeting the housing need for the HMA.

With regard to any Green Belt Review, this should be comprehensive in its remit, covering both the Black Country area and Green Belt areas immediately adjoining the settlement boundaries. On this point, it should be noted that the NPPF states that when local authorities are reviewing established Green Belt boundaries they should take account of the need to promote sustainable patterns of development, channelling development towards urban areas inside the Green Belt boundary (NPPF paragraph 84). Indeed, paragraph 85 of the NPPF identifies that when defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

We would encourage any comprehensive Green Belt Review to accord with the thrust of these criteria defined within paragraph 85 of the NPPF.

---

## 7.2.2 Policy HOU2- Housing Density, Type and Accessibility

**Question 36 - Do you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed? Yes/No; If yes, what standards should be applied instead, for example should the minimum net density of 35 dwellings per hectare be increased to maximise brownfield housing delivery?**

**Answer:** Yes

**Detail:** SLR considers that the current accessibility and density standards as set out within Policy HOU2 are appropriate for the Black Country Core Strategy Area and the wider HMA. This may, however, need to be updated following the publication of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study.

**Question 37a - Do you think that the existing Policy HOU2 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** SLR considers that the current threshold of 15 homes is entirely appropriate.

**Question 37b – If no, should it be reduced to 11 homes or more? Yes/No; If no what other threshold should be used and why?**

**Answer:** No

**Detail:** SLR views that the existing threshold of 15 homes is entirely appropriate and that reducing this threshold would place undue burden upon developers when housing needs are not currently being met within the HMA.

**Question 38 - Do you think that the current accessibility and density standards are appropriate for green belt release locations? Yes/No; If no, what standards should be applied in these locations and why?**

**Answer:** Yes

**Detail:** SLR considers that the current accessibility and density standards would be appropriate for Green Belt release locations.

**Question 39 - Do you think separate accessibility standards are needed for particular types of housing e.g. housing for the elderly or affordable housing (as occupiers may be less mobile and more dependent on public transport)? Yes/No; If yes, please provide details.**

**Answer:** Yes

**Detail:** SLR considers that separate accessibility and density standards would be appropriate for different housing types (i.e. elderly or affordable).

**Question 40 - Do you agree that the 2017 SHMA findings should be used to set general house type targets for the Plan period? Yes/No; If no, please explain why.**

**Answer:** Yes



---

**Detail:** SLR agrees but would suggest that the SHMA may require to be comprehensively updated to meet the housing needs identified within the forthcoming Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study. This Strategic study is likely to require the Black Country to undertake a review of both housing needs within the HMA and for the completion of a comprehensive Green Belt Review in collaboration with adjoining local authorities.

**Question 41a - Do you support the introduction of a policy approach towards self and custom build housing in the Core Strategy? Yes/No; If yes, would you support:**

**Answer:** Yes

**Detail:** SLR agrees with the concept of a policy approach which treats self and custom build housing separately within the Core Strategy.

**Question 41b - A target for each authority? Yes/No; Any further comments**

**Answer:** Yes

**Detail:** SLR strongly supports a target being allocated for each local authority and would also request that figures be provided for any cross boundary provision.

**Question 41c – A requirement for large housing sites to provide serviced plots? Yes/No; Any further comments?**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 41d - Another approach altogether? Yes/No; If yes, please specify.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 41e - Do you support the use of a variety of local approaches to Houses in Multiple Occupation (HMOs) across the Black Country? Yes/No; If no, please explain why.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

### **7.2.3 Policy HOU3- Affordable Housing**

**Question 42 - Do you agree that the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** SLR considers that the current affordable home target should be increased to reflect the 2017 SHMA. This may, however, need to be updated following the publication of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study and any subsequent update to the Strategic Housing Market Assessment. It must also be recognised that this is a target, not a requirement.

---

**Question 43a - Do you think that the existing Policy HOU3 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** SLR views that the existing threshold of 15 homes is entirely appropriate and that reducing this threshold would place undue burden upon developers when housing needs are not currently being met within the HMA.

**Question 43b – If no, should it be reduced to 11 homes or more? Yes/No; If no, what threshold should be used?**

**Answer:** No

**Detail:** SLR views that the existing threshold of 15 homes is entirely appropriate and that reducing this threshold would place undue burden upon developers when housing needs are not currently being met within the HMA.

**Question 44a - Do you think that the affordable housing requirement for eligible sites in Question 43 should be kept at 25% of the total number of homes on the site? Yes /No; Any further comments?**

**Answer:** Yes

**Detail:** SLR considers that the current affordable housing requirement as set out within Question 43 is appropriate for the Black Country Core Strategy Area and the wider HMA. This may, however, need to be updated following the publication of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study and any subsequent update to the Strategic Housing Market Assessment.

**Question 44b If no, should the percentage be increased to allow for the provision of affordable home ownership? Yes/No; If yes, what should the percentage be and why?**

**Answer:** No.

**Detail:** SLR has no comments to make in response to this question.

**Question 45 - Should an increased affordable housing requirement be set for green belt release sites, to reflect the likely financial viability of these sites? Yes/No; If yes, what should this be.**

**Answer:** No.

**Detail:** A single approach to affordable housing provision should be made for all sites which are brought forward. Viability as a measure of affordable housing provision is something that is dealt with during the application process and should not be contained within the Core Strategy itself.

#### **7.2.4 Policy HOU4- Accommodation for Gypsies, Travellers and Travelling Showpeople**

**Question 46 - Do you agree with the proposed new gypsy, traveller and travelling showpeople accommodation targets? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

---

## 7.2.5 Policy HOU5- Education and Health Care Facilities

**Question 47 - Do you think that Policy HOU5 should be expanded to cover other types of built social infrastructure and to set out standards for built social infrastructure to serve major housing developments? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 48 - Do you agree that the requirement in HOU5, to demonstrate there is adequate alternative provision to meet the needs of the community served by a facility which is to be lost, should be reviewed? Yes/No; If yes, please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

## 7.3 Policy Area C- The Black Country Economy

### 7.3.1 Policy DEL2- Managing the Balance between Employment Land and Housing

**Question 49a – Is there still a need for existing Policy DEL2 in order to manage the release of poorer quality employment land for housing? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** The release of poor quality employment land should be a continuous process. However, SLR would not support the release of further employment land at this point in time given the current demand within the Black Country. As outlined above, SLR considers that the release of Green Belt sites would be the most appropriate and sustainable strategy for the Black Country and the wider HMA to meet the necessary housing needs provision.

Releasing too much employment land will only necessitate the release of Green Belt land for employment rather than housing as this is a finite resource.

**Question 49b - If yes, should this policy be used to assess the release of employment land to alternative uses, other than housing? Yes/No; If yes, please explain why.**

**Answer:** Yes

**Detail:** Not all employment land that can be released would be suitable or of significant quantum to meet the housing needs of the Black Country and wider HMA. As such, alternate uses, including key services and infrastructure, should be considered at these locations where appropriate. This will ensure we make the best and most appropriate use of land.

### 7.3.2 Policy EMP1- Providing for Economic Growth and Jobs

**Question 50 – Do you think that the Core Strategy should continue to set a target for the total employment land stock in Policy EMP1? Yes/No; Please explain why.**

**Do you think that distinguishing between Strategic High Quality Employment Areas and Local Quality Employment Areas is still appropriate? Yes/No; Please explain why.**

**Answer:** Yes

---

**Detail:** A target should be set to ensure that sufficient employment land provision and stock is at the levels necessary to support the onward growth of the sub-region. In addition, SLR agrees that employment land within the Core Strategy area should continue to be graded to ensure that sites of strategic importance are afforded the due protection required for the plan period.

### **7.3.3 Policy EMP2- Strategic High Quality Employment Land and Policy EMP3- Local Quality Employment Land**

**Question 51 – Do you think that the criteria used to define Strategic High Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 52 – Do you think that the criteria used to define Local Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 53 – Do you think that Strategic High Quality Employment Areas should continue to be protected for manufacturing and logistics uses, with the other uses set out in Policy EMP3 discouraged? Yes/no; If not, what alternative approach do you recommend?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### **7.3.4 Policy EMP4- Maintaining a Supply of Readily Available Employment Land**

**Question 54 – Do you agree that the current approach in Policy EMP4 is no longer fit for purpose and should be amended to reflect a portfolio based approach? Yes/No; If no, what alternative approaches would you recommend?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### **7.3.5 Policy EMP5- Improving Access to the Labour Market**

**Question 55 - Do you agree with the proposal to retain Policy EMP5? Yes/No; If no please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### **7.3.6 Policy EMP6- Cultural Facilities and the Visitor Economy**

**Question 56 - Do you agree with the proposal to update Policy EMP6 in line with current priorities? Yes/No; If no, please explain why**

**Answer:** Yes

---

**Detail:** SLR has no comments to make in response to this question.

## 7.4 Policy Area D- The Black Country Centres

### 7.4.1 Policy CEN2: Hierarchy of Centres

**Question 57 – Do you support the proposal to merge Policy CEN1 and Policy CEN2, given that both policies focus on the overall strategy in the Black Country, including the hierarchy of centres? Yes/No; If you have any comments on Policies CEN1 and CEN2 please provide details.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 58 – Do you think there is any evidence to suggest that the hierarchy of centres is not appropriate going forward in the context of the regeneration strategy? Yes/No; If so, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 59 – Have all the appropriate centres within the Black Country been identified? Yes/No; If not, please specify additional centres.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 60 - Is there evidence to suggest that identified centres are no longer performing as a centre or at their identified level in the hierarchy? Yes/No; If yes, do you agree that they should be moved / removed within or out of the hierarchy?**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 61 - In addition to para 4.33 of the current Core Strategy should the revised Core Strategy include criteria for the creation of new centres that might be needed as a result of any additional housing identified through the plan? Yes/No; any further comments?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### 7.4.2 Policy CEN3: Growth in the Strategic Centres

**Question 62 - Do you agree that the Strategic Centres should remain the focus for large scale comparison retail (clothes, white goods etc), office and major commercial leisure development in the Black Country? Yes/No; Any further comments?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

---

**Question 63 - Do you agree that the targets for comparison retail floorspace and office floorspace should be revisited as part of this review to take into account current and future trends? Yes/No; Any further comments?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 64 - Is there a need to set targets for convenience retail floorspace in the Core Strategy? Yes/No; Any further comments?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 65 - Should the Core Strategy set any targets or policy requirements for leisure development in the Strategic Centres? Yes/No; Any further comments?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 66 - Should the Core Strategy set new housing targets for the Strategic Centres through the review? Yes/No; Any further comments?**

**Answer:** Yes

**Detail:** SLR supports the further provision of housing within the defined centres. However, it should be duly appreciated that this will not result in the quantum of housing that is required to meet current housing needs now and into the future. As such, further sites outside of the Strategic Centres and within the Green Belt will need to be considered to achieve the necessary level of allocation and/or safeguarding.

**Question 67 - Do you think there are any other uses and/or developments that should be planned for in the Strategic Centres? Yes/No; Please provide details.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 68 - Do you agree with the proposal to re-examine the detail and appropriateness of the existing conditions for retail growth at Merry Hill through the Core Strategy review? Yes/No; Do you have any further comment to make on this issue?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### **7.4.3 Policy CEN4: Regeneration of Town Centres**

**Question 69 - Should more types of uses be encouraged and more flexibility be allowed to ensure the regeneration and vitality of the Black Country Town Centres? Yes / No; Please explain why.**

**Answer:** Yes

---

**Detail:** SLR has no comments to make in response to this question.

**Question 70 – Do you think there are any specific developments or uses that should be supported in any particular Town Centre? Yes/No; Please provide details.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 71 - Should the Core Strategy set housing targets for the Town Centres? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR supports the further provision of housing within the defined town centres. However, it should be duly appreciated that this will not result in the quantum of housing that is required to meet current housing needs now and into the future. As such, further sites outside of the Strategic Centres and within the Green Belt will need to be considered to achieve the necessary level of allocation and/or safeguarding.

#### **7.4.4 Policy CEN5: District and Local Centres**

**Question 72 - Should more types of uses be encouraged and more flexibility be allowed to ensure the regeneration and vitality of the Black Country District and Local Centres? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 73 - Are there any specific developments or uses that should be supported in any particular District or Local Centre? Yes/No; Please provide details.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 74 - In the context of the 'centres first' strategy, should the threshold approach be reviewed to consider the appropriateness, scale and impact of development in and on the edge of Strategic, Town, District and Local Centres? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 75 - Should thresholds apply to all main town centre uses (Yes) or just retail uses (No)? Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

---

#### 7.4.5 Policy CEN6: Meeting Local Needs for Shopping and Services

**Question 76 - Is the approach set out in Policy CEN6 appropriate in the context of supporting local community needs? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 77 - Does the wording of the criteria clearly achieve the objectives of the centres strategy? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 78 - Should the policy clarify that this policy applies both to applications in edge-of-centre and out-of-centre locations, and should this also be referred to in the relevant centres policies? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 79 - Should the policy set what types of uses this policy applies to and set out any further types of material considerations that could be relevant for the determination of certain proposals, for example, the location or concentration of hot food takeaways, premises selling alcohol or gambling operations? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 80 - Should the policy clarify that those schemes of multiple units, where individual units are below the set figure, but the cumulative figure is above, also need to meet the relevant requirements of other centres policies? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

#### 7.4.6 Policy CEN7: Controlling Out-of-Centre Development

**Question 81 – Do you agree that the approach of strong control over out-of-centre development is still appropriate in the context of the strategy to ensure the vitality and viability of the Black Country Centres? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 82 - Is 200sqm (gross) an appropriate scale of development above which the impact tests should apply? Yes/No; Please explain why.**



---

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 83 - Should Policy CEN7 provide more guidance on accessibility? Yes/No; If yes, please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

#### **7.4.7 Policy CEN8: Car Parking in Centres**

**Question 84- Do you think that Policy CEN8 is still appropriate for managing car parking in centres and will ensure the network of Black Country Centres are maintained and enhanced over the plan period? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 85 - Should Policy CEN8, with regards to pricing of car parks, continue to be applied to Strategic Centres to ensure that pricing of parking is not used as a tool of competition? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

#### **Other Centre Issues**

**Question 86 – Do you think that there are other centre uses or centres issues that need to be addressed in the centres policies? Yes/No; Please provide details.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 87 - As shopping, leisure and other commercial trends continue to change, should the revised Core Strategy have a policy to reallocate out-of-centre attractions that are no longer viable for town centre uses for alternative uses such as for employment uses or housing? Yes/No; If no, please explain.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### **7.5 Policy Area E- The Black Country Transport Network**

#### **7.5.1 Policy CSP5- Transport Strategy**

**Question 88 - Do you agree that the overall transport strategy supports all of the Core Strategy spatial objectives? Yes/No; Please explain why.**

**Answer:** Yes

---

**Detail:** SLR supports the overall transport strategy contained within the Core Strategy in terms of meeting the spatial objectives. Notwithstanding, consideration will need to be given to any housing sites which are identified for Green Belt release and whether these would be of such quantum that additional infrastructure would be required to support these developments.

Notwithstanding, the transport strategy should recognise that the release of Green Belt sites within urban area are more sustainable than village locations given the choice of transport and proximity to services.

### 7.5.2 Policy TRAN1- Priorities for the Development of the Transport Network

**Question 89 - Do you support the proposed changes to the priorities for the development of the transport network? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR supports the identified priorities for development of the transport network but would encourage further links and accessibility to be invested within the Black Country.

Notwithstanding, the transport strategy should recognise that the release of Green Belt sites within the urban area is more sustainable than village locations given the choice of transport and proximity to services.

### 7.5.3 Policy TRAN2- Managing Transport Impacts of New Development

**Question 90 - Do you support the proposed changes relating to managing transport impacts of new developments? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** The transport strategy should recognise that the release of Green Belt sites within the urban area is more sustainable than village locations given the choice of transport and proximity to services.

### 7.5.4 Policy TRAN3- The Efficient Movement of Freight

**Question 91 - Do you support the proposed changes relating to the efficient movement of freight? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### 7.5.5 Policy TRAN4- Creating Coherent Networks for Cycling and Walking

**Question 92 - Do you support the proposed approach to providing a coherent network for walking and cycling? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

### 7.5.6 Policy TRAN5- Influencing the Demand for Travel and Travel Choices

**Question 93 - Do you support the proposed changes to Policy TRAN5? Yes/No; Please explain why.**

**Answer:** Yes

**Detail:** SLR supports the proposed changes to Policy TRAN5 but would encourage further consideration of links and accessibility to be invested within the Black Country to ensure the accessibility for economic purposes. Notwithstanding, the transport strategy should recognise that the release of Green Belt within the urban area is more sustainable than village locations given the choice of transport and proximity to services.

---

## 7.6 Policy Area F- The Black Country Environment

**Question 94 - Do you support the proposed changes relating to environmental infrastructure and place-making? Yes/No; If you think that any other changes should be made to Policies CSP3 or CSP4, please provide details.**

**Answer:** Yes

**Detail:** SLR supports the proposed changes relating to environmental infrastructure and how this can be incorporated within housing sites. Indeed, some consideration has already been given to this within the Promotional Document prepared in support of the site which is being sought as a Green Belt release. Such environmental infrastructure will be key to the deliverability of the site in terms of landscaping, ecological mitigation and biodiversity gains.

**Question 95a - Do you think Garden City principles should be applied in the Black Country? Yes/No; If yes, how should they be applied?**

**Answer:** Yes

**Detail:** SLR supports the proposed implementation of the Garden City principals and how this can be incorporated within housing sites. Indeed, some consideration has already been given to this within the Promotional Document prepared in support of the site which is being sought as a Green Belt release. Such environmental infrastructure will be key to the deliverability of the site in terms of landscaping, ecological mitigation and biodiversity gains.

**Question 95b - Should the application of Garden City principles be different for brownfield and greenfield sites? Yes/No; If yes, please explain why.**

**Answer:** No

**Detail:** The Garden City principals should be applied equal weight to both brownfield and greenfield sites. An exception to such principals can be made for large mixed use sites located within the designated centres as these will be aimed to be higher density sites but release of employment land in less central locations should still be subject to the Garden City principals if applied.

### 7.6.1 Policy ENV1- Nature Conservation

**Question 96 - Do you support the proposed changes relating to nature conservation? Yes/No; If no, do you think that any other changes should be made to Policy ENV1?**

**Answer:** Yes

**Detail:** SLR supports the proposed changes relating to nature conservation and how this can be incorporated within housing sites. Indeed, some consideration has already been given to this within the Promotional Document prepared in support of the site which is being sought as a Green Belt release. Such environmental infrastructure will be key to the deliverability of the site in terms of landscaping, ecological mitigation and biodiversity gains.

### 7.6.2 Policy ENV2- Historic Character and Local Distinctiveness

**Question 97 - Do you support the proposed changes relating to Historic Character and Local Distinctiveness? Yes/No; If no, please provide details of any other changes that should be made to Policy ENV2.**

---

**Answer:** Yes

**Detail:** SLR supports the proposed changes relating to historic character and local distinctiveness and how this can be incorporated within housing sites. Indeed, some consideration has already been given to this within the Promotional Document prepared in support of the site which is being sought as a Green Belt release. Such considerations include the sites proximity to both designated and non-designated heritage assets, its setting within the wider landscape context and consideration of the local distinctiveness associated with the Area of High Historic Landscape Value designated at the site.

### **7.6.3 Policy ENV3- Design Quality**

**Question 98 - Do you support the proposed changes relating to Design Quality? Yes/No; If you think that any other changes should be made to Policy ENV3 please provide details.**

**Answer:** Yes

**Detail:** Design Quality will be key for the release of Green Belt sites either within or adjoining the Black Country Core Strategy area.

**Question 99a - Do you think that national standards for housing development on water consumption should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.**

**Answer:** No

**Detail:** Such national standards would make housing more expensive to build and may not be achievable for many sites within the HMA. The introduction of such standards could result in a further backlog in the provision of housing needs within the HMA, thereby failing to ensure that the Black Country delivers the housing numbers required over the plan period and placing non-allocated sites at risk of development.

**Question 99b - Do you think that national access standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.**

**Answer:** No

**Detail:** Such national standards would make housing more expensive to build and may not be achievable for many sites within the HMA. The introduction of such standards could result in a further backlog in the provision of housing needs within the HMA, thereby failing to ensure that the Black Country delivers the housing numbers required over the plan period and placing non-allocated sites at risk of development.

**Question 99c - Do you think that national space standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.**

**Answer:** No

**Detail:** Such national standards would make housing more expensive to build and may not be achievable for many sites within the HMA. The introduction of such standards could result in a further backlog in the provision of housing needs within the HMA, thereby failing to ensure that the Black Country delivers the housing numbers required over the plan period and placing non-allocated sites at risk of development.

**Question 99d - Do you think that the standards should be different for brownfield and greenfield sites? Yes/No; If yes, please explain how and why.**

---

**Answer:** No

**Detail:** Any standards set, whether local or national, should be applied to all housing sites within the Black Country area. There should be no differentiation between brownfield and greenfield sites if standards are to be applied within the HMA. Such differentiation could lead to further inequality of housing stock.

#### **7.6.4 Policy ENV4- Canals**

**Question 100 - Do you support the removal of the reference made to canal projects? Yes/No; Do you think that any other changes should be made to Policy ENV4? Please provide details.**

**Answer:** Yes.

**Detail:** SLR has no comments to make in response to this question.

#### **7.6.5 Policy ENV5- Flood Risk, Sustainable Drainage (SuDS) and Urban Heat Island Effects**

**Question 101a - Do you support the proposed changes relating to Flood Risk, Sustainable Drainage and Urban Heat Island effects? Yes/No; Further comments?**

**Answer:** Yes

**Detail:** SLR agrees with the proposed changes relating to Flood Risk, Sustainable Drainage and Urban Heat Island effects.

**Question 101b - Do you think that any other changes should be made to Policy ENV5? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

#### **7.6.6 Policy ENV6- Open Space, Sport and Recreation**

**Question 102a - Do you support the proposed changes relating to open space, sport and recreation? Yes/No; If no, please explain**

**Answer:** Yes

**Detail:** The policy is already in accordance with national guidance and therefore is considered appropriate for inclusion within the forthcoming Core Strategy. SLR has no comments to make in response to this question.

**Question 102b - Do you think that Policy ENV6, taken together with national and local policies, provides sufficient protection from development for open space? Yes/No; If no, please explain**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 102c - Do you think that any other criteria need to be added to Policy ENV6, or any other changes should be made. Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

---

### 7.6.7 Policy EN7- Renewable Energy

**Question 103a - Do you think that Policy ENV7 should be changed to allow increased energy efficiency standards to be accepted in lieu of renewable energy provision for non-domestic buildings? Yes/No; If not, please explain**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 103b - Do you think that the 10% requirement should be changed? Yes/No; If yes, please specify what percentage would be more appropriate and to what type of site it should apply.**

**Answer:** No

**Detail:** Current requirements are considered to be in accordance with national standards. Any further increase would likely result in the delivery of a housing site becoming more expensive to build and may not be achievable for many sites within the HMA. The introduction of such requirements could result in a further backlog in the provision of housing needs within the HMA, thereby failing to ensure that the Black Country delivers the housing numbers required over the plan period and placing non-allocated sites at risk of development.

### 7.6.8 Policy ENV8- Air Quality

**Question 104 - Do you support the proposed changes relating to Air Quality? Yes/No; If you think that any other changes should be made to Policy ENV8 please provide details.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

## 7.7 Policy Area G- Waste

**Question 105 - Do you think that Policy WM1 identifies all of the key waste issues that need to be addressed in the Core Strategy, in accordance with national policy? Yes/No; If not, please specify what changes should be made to the Policy.**

**If you have any evidence that can be referred to in the Waste Study, please provide details.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 106a - Do you support the approach set out in Policy WM2? Yes/No; If no, please explain why.**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 106b – Are there any strategic waste management sites that no longer need to be protected? Yes/No; If yes, please provide details**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

---

**Question 106c – Are there any new sites that do need to be protected? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 107 - Do you think that there are any strategic waste management proposals that should either be removed from or added to the list in Policy WM3? Yes/No; If so, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 108 – Do you agree that Policy WM4 provides an appropriate level of control over the location and design of new waste management facilities? Yes/No; If no, what changes do you think should be made to the Policy?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 109 – Do you agree that Policy WM5 provides an appropriate level of control over resource management for new developments? Yes/No; If no, what changes do you think should be made to the Policy?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

## **7.8 Policy Area H- Minerals**

**Question 110 - Do you think that Policy MIN1 identifies all of the key minerals issues that need to be addressed in the Core Strategy, in accordance with national policy? Yes/no; If no, what changes should be made to the policy?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 111 - Do you agree with the proposed change to ‘prior extraction’ requirements, to maintain a size threshold in urban areas and increase the threshold for green belt sites to 3 ha? Yes/No; If no, what evidence do you have to justify an alternative approach?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 112a – Are there any key mineral related infrastructure sites that no longer need to be protected? Yes/No; please provide details**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

---

**Question 112b – Are there any other sites that do need to be protected? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 113 - Do you think that Policy MIN2 identifies all of the key aggregate minerals issues that need to be addressed in the Core Strategy up to 2036, in accordance with national policy? Yes/No; If not, what changes should be made to the policy?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

**Question 114 – Do you have evidence of workable, viable deposits of brick clays outside the areas of search, which could justify defining new areas of search? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 115a - Do you have evidence of any realistic possibility of fracking in the Black Country? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 115b - Do you think there are particular issues for the Black Country that would justify approaches different from those in national policy? Yes/No; If yes, please provide details.**

**Answer:** No

**Detail:** SLR has no comments to make in response to this question.

**Question 116 - Do you think that Policy MIN5 identifies all of the key issues that need to be addressed in relation to new mineral developments in the Core Strategy, in accordance with national policy? Yes/No; If not, what changes should be made to the policy?**

**Answer:** Yes

**Detail:** SLR has no comments to make in response to this question.

## **7.9 Policy Area J- Growth Network Detailed Proposals**

**Question 117 - Do you agree with the proposed approach to updating and amending Appendix 2 and Tables 2 and 3 of the existing Core Strategy? Yes/No; If not, what alternative approach would you suggest?**

**Answer:** Yes

**Detail:** The approach to updating and amending Appendix 2 and Tables 2 and 3 of the existing Core Strategy is appropriate. This will need to take account of the findings of the Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study and any findings it may have that influence both housing



---

needs within the HMA and the potential release of Green Belt land in collaboration with adjoining local authorities. SLR does, however, view that it would be more sustainable to accommodate housing allocations within the Green Belt rather than larger employment land sites.

Finally, consideration must be given to the deliverability of larger housing sites within the Growth Networks and Regeneration Corridors, especially given the constrained nature of these sites and their longer term timescales for release. The Core Strategy has already identified that there have been significant delays to bringing forward such sites given the costs of land assembly and remediation. As such, there will need to be an interim solution to meet short term housing need whilst the larger strategic brownfield sites are being released for development.

## 7.10 Policy Area K- Monitoring and Additional Policies

**Question 118 - Do you agree with the proposal to streamline and simplify the Core Strategy Monitoring Framework? Yes/No; If no, please explain why**

**Answer:** Yes

**Detail:** SLR agrees with the streamlining and simplification of the Core Strategy Monitoring Framework to make the process more efficient and effective. As indicated, a number of Core Strategy indicators have been hard to collect and national policy on framework monitoring has changed since the Core Strategy was adopted in 2011. This will, however, need to be an ongoing process with a number of strategies and policies requiring to be updated as the monitoring framework and evidence base documents are published.

**Question 119 – Do you think that a new Core Strategy policy is required? Yes/No; If yes, please explain why and provide details of the suggested policy.**

**Answer:** Yes

**Detail:** Given the current housing shortfall, the identified OAN for the Black Country up to 2036 and the need to accommodate development outside of the urban area, SLR would support the review of the Core Strategy Policy.

There will need to be consideration given to the preparation of the additional evidence base documents that would support such policy, including a comprehensive Green Belt Review to ensure the allocation or safeguarding of sufficient housing sites for this plan period and beyond.

As such, a new policy section will be required to address this strategy and the findings of the evidence base documents that support the Core Strategy Review. It is also considered that this is likely to include the allocation of specific sites rather than broad areas for development.

## EUROPEAN OFFICES

### United Kingdom

#### AYLESBURY

T: +44 (0)1844 337380

#### BELFAST

T: +44 (0)28 9073 2493

#### BRADFORD-ON-AVON

T: +44 (0)1225 309400

#### BRISTOL

T: +44 (0)117 906 4280

#### CAMBRIDGE

T: + 44 (0)1223 813805

#### CARDIFF

T: +44 (0)29 2049 1010

#### CHELMSFORD

T: +44 (0)1245 392170

#### EDINBURGH

T: +44 (0)131 335 6830

#### EXETER

T: + 44 (0)1392 490152

#### GLASGOW

T: +44 (0)141 353 5037

#### GUILDFORD

T: +44 (0)1483 889800

#### LEEDS

T: +44 (0)113 258 0650

#### LONDON

T: +44 (0)203 691 5810

#### MAIDSTONE

T: +44 (0)1622 609242

#### MANCHESTER

T: +44 (0)161 872 7564

#### NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

#### NOTTINGHAM

T: +44 (0)115 964 7280

#### SHEFFIELD

T: +44 (0)114 245 5153

#### SHREWSBURY

T: +44 (0)1743 23 9250

#### STAFFORD

T: +44 (0)1785 241755

#### STIRLING

T: +44 (0)1786 239900

#### WORCESTER

T: +44 (0)1905 751310

### Ireland

#### DUBLIN

T: + 353 (0)1 296 4667

### France

#### GRENOBLE

T: +33 (0)4 76 70 93 41