

Black Country Core Strategy **'Have your Say' Response Form**

We want your views on the future of the Black Country. This form is to help you to comment on the Black Country Core Strategy Issues and Options Consultation. The document is available on the website at:

www.blackcountrycorestrategy.dudley.gov.uk

How to complete this form: We have set out a number of questions in the Issues and Options document that we would like you to answer. You can answer as many or as few questions as you like. You can also make comments on any other part of the plan or supporting evidence and documents. This form is provided as a single box. If you are making representations of different sections of the Issues and Options document please use a separate box for each question or chapter.

Where possible please submit evidence to support your views. This can range from a personal explanation behind your choice of option, to detailed figures from a piece of published evidence. If you are submitting detailed supporting evidence it would be helpful if you could include the title, author and date of the document(s). Any supporting evidence can be attached to this form or submitted as a separate document.

How to submit your comments: Please complete this form and return it by **5pm 8th September 2017**. Any comments received beyond this date might not be taken into account. This form and any other documents you might wish to provide can be sent by email to blackcountrycorestrategy@dudley.gov.uk or by post to:

Dudley Council
Council House
Priory Road
Dudley
DY1 1HL

If you require this form in an alternative format please contact 01384 814136 or blackcountrycorestrategy@dudley.gov.uk

Please provide your contact details. Unless you request otherwise your name and comments will be published as part of the consultation process, however your address and contact details will not be made publicly available and will be protected.

Contact Details

First Name: SANDRA

Surname: FORD

Organisation / Company Name: HOMES AND COMMUNITIES AGENCY

Address: 5 ST PHILLIPS PLACE, COLMORE ROW, BIRMINGHAM.

Postcode: B3 2PW.

Email Address:

Phone Number:

Please place an X in the one box that best describes you / your role in responding to this consultation.

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc.	
Developer or Investor		Public agency / organisation	X
Landowner		Statutory Consultee	
Planning Agent or Consultant		Charity	
Land & Property Agent or Surveyor		Duty to co-operate	
Community or other Organisation		Other (please specify in space below)	

Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.

Chapter / Page / Question / Paragraph
Do you agree or disagree with the approach set out in the relevant section and / or question?
Comments (continue on a separate sheet if necessary)
<p>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?</p> <p>The HCA has no detailed comments at this stage on the actual boundaries of the Regeneration corridors but suggests that the capacity of each corridor for housing is reviewed to ensure the maximum amount of quality housing and the place making aspirations can be delivered. In particular the capacity of regeneration corridors close to railway stations, Metro lines and proposed Metro lines should be intensified. An understanding of the delivery issues affecting each corridor would be useful along with an associated delivery and implementation plan.</p> <p>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?</p> <p>The HCA suggests that a robust assessment of the capacity within each of the regeneration corridors needs to be carried out along with a greater understanding of the delivery issues in order to determine the most appropriate sustainable location for housing and employment.</p> <p>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.</p> <p>The HCA suggests that in determining the “rounding off” option would depend on the actual location, size and scale of proposed development in the context of its proposed location, the provision of the existing services and the new population’s ability to access these services in a sustainable way. Failure to properly plan these areas could result in necessary infrastructure not being delivered.</p> <p>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).</p> <p>The identification of these areas should be informed by a robust assessment of the Green</p>

Belt areas.

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.

The HCA has extensive experience of dealing with the development and delivery of large scale urban extensions. As set out in the Issues and Options document they do allow for large scale place making opportunities and to create sustainable new communities. Given the nature of the Black Country the location of such a scheme would need to take into account the location of existing facilities and the opportunities that any new development could benefit existing residents.

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

The table below provides guidance as to the infrastructure requirements based on population. Naturally, given the nature of the Black Country the actual location of any large scale development and the infrastructure required would be subject to individual assessment.

Facility	Population
Primary school	1: 2,500 - 4,500
Secondary school	1: 7,000 - 15,000
Doctor's surgery	1: 2,500 - 3,000
Public House	1: 5,000 - 7,000
Corner shop	1: 2,000 - 5,000
Local shopping centre	1: 5,000 - 10,000
Post Office	1: 5,000 - 10,000
Health centre (4 doctors)	1: 9,000 - 12,000
Library	1: 12,000 - 30,000
Church	1: 9,000 minimum
Community centre	1: 7,000 - 15,000
Youth club	1: 7,000 - 11,000
Sports centre	1: 25,000 - 40,000
Superstore/district centre	1: 25,000 - 40,000

Source - Sustainable Settlements: A Guide for Planners, Designers and Developers

Caution - This list is indicative only, as it is based on cityscale rather than small towns. Also catchments may vary from place to place and over time. It does, however, provide a basic guide to the number of people required to support each of the facilities listed.

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?

The identification of any locations for SUE's which it is understood may be located in the Green Belt would have to be determined through a robust evidence based selection process in accordance with the NPPF and the White Paper, 'Fixing our broken housing market'. The actual location, form, function and size of the SUE would then determine the actual infrastructure requirements.

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?

Given the scale and complexities of developing SUE's the Black Country Authorities need to be satisfied and indeed will need to demonstrate to the Planning Inspectorate that any SUE's proposed will be viable and deliverable. On that basis the HCA considers that the Core Strategy should contain sufficient guidance for the development of the SUE/SUE's. Please find attached a link to a report produced by the HCA entitled 'Policy making for strategic sites' which contains advice on the approach to take when proposing large site allocations within Local Plans. [\hca.local\wa\NCU\ATLAS\RESEARCH 46.3\Strategic Site Allocations\Revised guidance\final guide 2014\Policy Making for Strategic Sites - Final 50214.docx](#)

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.

If the proposal is for sites to come forward within the Green Belt, then yes Policy DEL1 should be updated to reflect this as it is imperative that all infrastructure requirements are known and costed in order to demonstrate delivery.

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.

Please see response to Q. 13b.

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?

Please see response to Q. 13b.

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.

In order to understand what tools or interventions are required to ensure enough infrastructure is provided it will be necessary to understand the existing position relating to the infrastructure and an assessment made as to whether it will be fit for purpose for the lifetime of the Plan. Once an understanding of the entire infrastructure requirements are

known and costed it will then be possible to explore what other tools or interventions the HCA could assist with.

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.

The HCA suggests a phasing policy would address this issue.

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?

One of the areas that the HCA has experience across the country is not the actual level of funding but organisations having the necessary delivery skills in bringing urban sites forward for development. One mechanism could be to review the setting up of a dedicated implementation and delivery team.

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

The HCA welcomes the potential to increase high density housing allocations within Strategic Centres. In addition to Walsall we suggest that all of the strategic centres are reviewed to ensure that the maximum housing capacities within these key areas are identified.

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?

The existing policy sets out that higher densities of 60+ or more are only acceptable in strategic centres. The HCA considers that higher densities of 60+ would also be acceptable near to or in close proximity to railway stations, metro/proposed metro stops and other public transport nodes.

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

Yes. The HCA consider that higher densities should be fully explored within all of the strategic centres.

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

The HCA broadly supports the changes to the priorities for the development of the transport network and in particular supports the priority to continue to provide rapid transit extensions to the Midland Metro and re-introduce rail services to connect the Black Country Strategic Centres given this will assist in the opportunity for the delivery of additional housing within easy access of sustainable transport.

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.

The HCA are fully supportive of the proposed changes which will reflect the Garden City principles and quality place making principles. The HCA would be supportive of a Garden City quality accreditation system which would fulfil the aspirations of raising the design and place making within the Black Country.

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

Yes, and suggest there needs to be a mechanism for ensuring the principles are applied to existing areas or that existing residents have the benefit of new open spaces created as part of any new development.

As set out above the HCA would be supportive of a quality accreditation scheme.