

Our ref: 170908 J035136 BCCS Issues & Options Reps

Your ref:

Black Country Core Strategy Team  
c/o Dudley MBC

**By email**

08 September 2017

Dear Sir/Madam,

**Black Country Core Strategy, Issues and Options Report, Public Consultation  
Comments on behalf of Severn Trent Water**

GL Hearn acts on behalf of Severn Trent Water (STW) in relation to its land interests within the Black Country, and has been instructed by STW to submit representations to the above Issues and Options Consultation.

STW is a regulated utility company with statutory responsibilities for the provision of water and sewerage services across the English Midlands and Central Wales. As a result of changing processes in relation to clean water provision and wastewater treatment, significant areas of land are no longer required by the business for operational purposes and as such are surplus to requirements. STW is currently undertaking a programme of rationalising its land holdings and is seeking to dispose of redundant operational assets for alternative uses through a process of Irrevocable Sign Off (ISO). Proceeds from the asset disposal are reinvested back into the core business to improve services for its customers.

The purpose of this representation is to provide general comments on the Issues and Options consultation document, particularly in respect of STW's landholdings in the Black Country. Details of the STW sites have been submitted via the concurrent 'Call for Sites' exercise.

STW are keen to work collaboratively with the Black Country Authorities to deliver a 'sound' Core Strategy (BCCS) which meets the identified housing and employment needs in the BCCS area. We would welcome a meeting with the Councils' officers to discuss in greater detail STW's site review programme and potential development opportunities offered by it that could make a significant contribution to meeting the anticipated future housing or employment needs of the Black Country region.

STW is generally supportive of the approach taken by the Black Country Authorities to maintain the existing 'two-tier' local plan approach whereby strategic planning issues across the Black Country area are addressed through the BCCS with site allocations and detailed policies being pursued via specific Local Plans for each Local Authority constituent area.

However, it is evident from the content of the Issues & Options Report that the scale of forecast housing and employment needs will not be delivered within the 'centres/corridors' framework of the current Core Strategy or within the existing Black Country urban area generally.

As the Issues & Options Report recognises, accommodating all future development needs will necessitate the release of Green Belt land. STW supports the need to review the Green Belt to ensure that appropriate sites are brought forward in the most sustainable locations to be of benefit to the needs of residents and businesses and in order to support the growth expectations and aspirations of the Black Country region.

We would question however, whether it is appropriate at this stage and prior to the conclusion of on-going research and evidence (including Green Belt Reviews and SHLAAs) to potentially pre-determine that the 'centres/corridors' approach of the current BCCS should be maintained as a core element of the reviewed Core Strategy, and that the subsequent choice for accommodating growth should follow the sequential stages outlined at Table 2.

Rather, given the growth requirements and the acknowledgement that Green Belt land release will be required, we would encourage the Core Strategy process to consider the most appropriate and deliverable distribution of development to meet the strategic objectives and growth ambitions, within the context of national policy and with reference to the existing urban area but without, at this stage, potential constraints imposed by the existing strategic policy framework.

Such an approach may also enable a degree of flexibility to the pattern of distribution of housing and employment, that best reflects the needs of the market and therefore likelihood of delivery.

STW also generally supports the recognition that sites outside the Black Country may have potential to contribute to Black Country needs, albeit within the context that an authority or - as here – authorities should seek to meet their own needs within their own areas if possible.

In association with this representation to the Issues & Options report, GL Hearn has submitted a number of STW sites to the call for sites exercise. The sites submitted are:

**Walsall:**

Goscote Works (14.9ha)

Land at Walsall Wood (10.9ha)

Land at Willenhall, Walsall Road (10ha)

**Sandwell:**

Land at Roway Lane (3.4ha)

Land at Bescot (12.9ha)

*(existing allocated residential site - Policy HOC8 Sandwell Site Allocations and Delivery DPD)*

Land at Ray Hall Lane (30ha)

**Dudley:**

Enville Street, Stourbridge (1.4ha)

**Wolverhampton**

Barnhurst, Oxley Moor Road (12.9ha)

We anticipate being able to provide further information in respect of these sites in the near future, additional to that provided via the current call for sites response.

As referred, STW as a major landowner within the Black Country area, is keen to work collaboratively with the Black Country Authorities to deliver a 'sound' Local Plan which meets the identified housing and employment needs of the Black Country region, and potentially the wider Birmingham area.

As a major landowner, with a number of sites across the region that offer significant development potential, STW considers it could make a significant contribution to delivering the Black Country's residential and/or employment growth requirements.

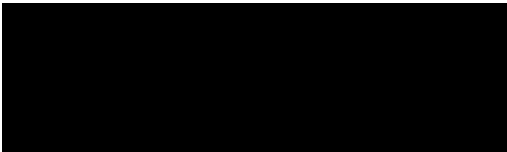
We would welcome discussions with the Black Country Authorities to discuss and further explore the potential development opportunity of the STW's sites and how they may contribute to delivering the residential and economic growth targets.

In the meantime we trust that this representation will be taken into full consideration in the preparation of the next stage of the Core Strategy.

We would be grateful if you could ensure that we remain on the mailing list to receive notification of future local plan updates and consultations.

Should you have any queries or wish to discuss then please do not hesitate to contact me

Yours faithfully,



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Planning Associate Director

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