

BLACK COUNTRY CORE STRATEGY – Issues & Options Consultation 2017

Response by the Inland Waterways Association.

The Inland Waterways Association (IWA) is a national charity which campaigns for the conservation, use, maintenance, restoration and development of the inland waterways for public benefit. The Lichfield Branch of IWA covers the canals to the east and northeast of Walsall town centre. The rest of the Black Country is covered by our Birmingham, Black Country and Worcestershire Branch. IWA has considered this consultation in relation to the environment of the canals and the interests of their users.

Policy ENV4 – Canals

Q100. Do you support the removal of the reference made to canal projects? – NO
Do you think that any other changes should be made to Policy ENV4? – YES
Please provide details.

IWA welcomed Policy ENV4 in 2010 and it remains relevant and necessary to protect and enhance the canal network in the Black Country and to safeguard the routes of canal restoration projects.

We and others did point out that the supplementary text, in supporting the restoration of the Hatherton Canal, should also refer to the other restoration schemes within or benefiting the Black Country canal network, including the Lichfield Canal and the Lapal Canal. Since that time all these projects have progressed and a project to restore the Bradley Canal has also been promoted and gained local support. Each of these restoration schemes would reinstate an important strategic link in the region's canal network which will greatly benefit the recreation facilities and visitor economy of the Black Country. Each project has had feasibility reports done which define their route, engineering requirements, costs and benefits, and significant physical restoration work has now been achieved on the first three.

Therefore, IWA considers that the Policy text should remain as it is, but that paragraph 6.19 should be updated and expanded as follows:

"Projects to restore several canals within or connecting with the Black Country are well established and are supported as important strategic additions to the region's canal network. The Hatherton Canal will link the Wyrley & Essington Canal in Pelsall with the Staffordshire & Worcestershire Canal west of Cannock. The Lichfield Canal will link the Wyrley & Essington Canal at Brownhills with the Coventry Canal east of Lichfield. The Lapal Canal will link the Dudley No.2 Canal at Halesowen with the Worcester & Birmingham Canal at Selly Oak. The Bradley Canal will link the Wednesbury Oak Loop at Bradley with the Walsall Canal at Moxley. Each of these projects will benefit the recreation facilities and visitor economy of the Black Country."

The reasons given in the Issues & Options Report at 6.1.55 for suggesting removal of references to canal projects, and specifically the Hatherton Canal, are wholly unconvincing. These are strategic projects, of significant length and with cross-boundary locations between Black Country boroughs and adjacent authorities, that require a strategic and co-operative approach to the safeguarding of their routes, as is recognised by the existing Policy. It is simply not credible to say they can just be

considered at a local level. The local level plans can more clearly define the safeguarded alignment of their sections of the route and deal with any local issues, but for coherency and effectiveness the complete route also needs to be referenced and supported at a higher level through the Core Strategy.

The particular reasons cited for the Hatherton Canal; water availability and Habitats Regulations, are matters to be addressed by other authorities and there is no reason to suppose they cannot be satisfactorily answered. Water supply for the canal network is the responsibility of the Canal & River Trust, in conjunction with the Environment Agency and the canal restoration trusts. Safeguarding is not the same as a site allocation and does not in itself require an HRA. Such assessments, where relevant, will be considered at the appropriate time when pertinent to planning applications. Neither of these reasons are therefore any impediment to an expression of support for individually named projects or to the essential safeguarding of those routes from severance, as has been provided by the current Black Country Core Strategy since 2011.

For comparison, the BCCS safeguards land needed for the implementation of priority transport projects and identifies those projects including new roads, railways and metro lines (Policy TRAN1). Each of these may be subject to resource provisions or Habitats Regulations Assessments, but that is not a reason for declining to name them in the Core Strategy and leaving it to local level site allocation documents or area action plans. The four canal restorations are not only recreation, tourism and wildlife corridors but are also major transport infrastructure projects.

Therefore, IWA advises that Question 100 and the justification for it is fundamentally misguided, that the present Policy ENV4 – Canals should be retained unaltered, but that the supporting text needs to be updated and expanded to refer to all the established canal restoration projects, including the Hatherton Canal, with new text as, or similar to, that suggested above.

Implications of the Core Strategy Review for the Existing Canal Network

The canals in the Black Country are historic waterways and valuable amenity and recreational corridors providing leisure boating, walking, angling, cycling and nature conservation benefits to the area. They are part of the national waterway system which attracts millions of visits each year from local people and holidaymakers from home and abroad, and a major component of the nation's tourism industry.

Whilst the surroundings of parts of the Black Country network are of interest for their historic industrial architecture, and others for their modern commercial or domestic buildings, it is generally the more rural parts of the network that are most attractive for visitors. Holidaymakers do not want to go boating past endless housing or industrial estates.

The rural parts of the canals play a vital role in encouraging continued recreational use of the whole canal system and thereby helping to fund its maintenance and improvement. The income from boating activities helps support local businesses and provides a major part of the funding necessary for the Canal & River Trust to maintain the canals for public use and enjoyment.

However, visually intrusive built development alongside the canals diminishes their tourism potential and economic benefits. The attractive countryside setting of parts of the canal system could be lost by the proposals for extensive Green Belt development which would diminish their value to the local community and the visitor economy.

There are areas of canalside Green Belt within Wolverhampton, Dudley and Sandwell which may be threatened but the greatest extent of Green Belt is in Walsall. To the north and east of Walsall the open countryside setting of the Wyrley & Essington Canal around Pelsall and Brownhills, the Daw End Branch around Walsall Wood, Rushall and Hay Head, and the Rushall Canal around Longwood and Shustoke are particularly valued.

IWA considers that these parts of the Green Belt in particular, with their additional canal amenity, recreation and tourism value, should be excluded from any Green Belt review.

The Core Strategy Review and Green Belt Issues

Timing and Purpose of Review

1.3 IWA does not agree that a review of the Core Strategy is necessary or desirable at this time. The present Strategy has 9 years to run to 2026 and allowing a generous 3 years for the process the review does not need to start until 2023. The suggestion that local plans require updating every 5 years is ridiculous. A local plan should be robust enough to last for 15 years and premature and frequent reviews serve only to undermine the credibility of the whole process and discourage democratic public participation, playing into the hands of developers who will always exploit any weaknesses in the system.

1.4 The specific reasons given are unconvincing; HS2 will not serve the Black Country and a possible Midland Metro extension whilst welcome would be hardly game changing. The national economic situation may have changed somewhat but it is likely to change even more after 2019 due to Brexit and any review now could be rapidly outdated before it is adopted.

Q.1 IWA does not agree that a review, partial or otherwise, is necessary at this time.

1.19 The present Core Strategy adopted in 2011 does not require building on the Green Belt and it is not accepted that circumstances have changed so much since then as to require the extensive Green Belt development now being suggested. The main purpose of the Green Belt for 70 years has been to restrict urban sprawl, preserve countryside and encourage urban regeneration. This remains Government policy despite extensive attempts to undermine it in the last few years. This consultation shamefully joins in the scramble to dismantle this essential element of post-war planning for the short term gain of developers at the expense of the long term public interest.

Local authorities are required to compile a Brownfield Land Register by the end of 2017 and it is wholly premature to claim that release of Green Belt will need to be considered before the results of that exercise are known. The absence of any reference to this statutorily required study is not acceptable.

1.25 The 'Call for Sites' should be restricted to Brownfield sites and non-Green Belt greenfield sites. Any Green Belt greenfield sites put forward should not be considered further unless Exceptional Circumstances can be clearly demonstrated.

2.9 Despite the recession and slower house building due to depressed demand, this confirms that the 2026 housing supply target can be met. Therefore, notwithstanding uncertainties about individual sites, there is no justification for a premature review.

Q2. The key evidence must include the Brownfield Land Register that should be currently underway according to Government requirements.

Housing Need

3.10 The excessive overestimates of Birmingham's unmet housing need are not a reason for extensive Green Belt development in Birmingham, let alone in the Black Country. The purpose of Green Belt is to geographically constrain development and if need really can't be met within the conurbation, on Brownfield land and through increased development density, then it should be directed outside the Green Belt in planned new settlements in the same way that Telford and Milton Keynes for example were planned in more enlightened times.

3.11 The Housing Needs Study suggestion that the supply of brownfield land is insufficient cannot and should not be relied on before completion of the Brownfield Land Register required later this year.

3.13 The so-called "Objectively Assessed" Housing Need methodology produces notoriously overestimated figures based on the irrational assumption that Britain can accommodate and will tolerate continuing very high levels of immigration, and that this can be arbitrarily shared out across the country. In fact, immigrants tend to concentrate in already high immigrant areas and the Black Country, for all its past diversity, has more recently had a stable or falling population so the sudden increase in the projections and consequent housing need predictions is not credible.

3.17 The conclusion that a large number of new homes need to be built on the Green Belt is fundamentally wrong. Everything possible needs to be done to continue to accommodate modest native population growth within the existing urban areas, and certainly within the constraints of the Green Belt. Taking the 'easy option' of trashing the Green Belt without first exploring every other alternative is irresponsible and reprehensible.

Q3. IWA does not agree that the claimed housing need is appropriate.

Employment Land

3.24 Estimates of employment land need follow the same population forecasts driving the housing need estimates, and are subject to at least the same degree of overestimation, plus the move away from real manufacturing jobs to warehousing that is land hungry but employment poor, and not in the public interest.

Q4. IWA does not agree that the estimated employment land requirement is appropriate.

Green Belt Review

3.40 The legal requirement for 'exceptional circumstances' to justify Green Belt development still applies and the cavalier way in which this is proposed to be ignored is not acceptable. The prediction of future unmet housing need is speculative, based on dodgy statistics and predictions, and not a current reality. Should it transpire, after 2026, it will still not justify large scale Green Belt development, but rather increased efforts to maximise reuse of brownfield land, higher building densities, and ultimately overspill development beyond the Green Belt.

3.41 The Green Belt is meant to be permanent, other than very minor tidying-up of its boundaries. It is right that there has been no previous strategic Green Belt review in the Black Country and it should stay that way.

3.43 The 'cherry-picking' of Green Belt sites by assessing the 'contribution' of a series of land parcels, as recently conducted by some other local authorities, is fundamentally misguided. The purpose and value of the West Midlands Green Belt is as a unified whole, not as a series of separate sites. It should be defended and, if ever necessary, reviewed on a regional basis and not by individual local authorities or in this case a sub-set of them.

Q5. IWA does not agree that there needs to be a major review of Green Belt boundaries, and certainly not by the Black Country authorities in isolation.

Q6. Needless to say, in view of the above, IWA does not agree that these are the right key issues.

Q7. Agreed.

Q8. Agreed.

Other Questions

Q9 – Q99. In view of our fundamental disagreement with the timing and intentions of the review to justify extensive Green Belt development, IWA does not express any detailed opinions on the relative demerits of various ways of achieving this.

Q100. See separate comments above.

Q101 – Q119. No comment.

Conclusions

This Issues & Options Report is premature and unnecessary. It uses inflated estimates of housing and employment land need. It fails to acknowledge the importance of the current Brownfield Land Register work and makes unjustified and unacceptable proposals for extensive Green Belt development. It should be withdrawn and discontinued.