

# **“Black Country Core Strategy”**

## **Consultation response on behalf of the Futures Network West Midlands**

### **1. Introduction**

The Futures Network West Midlands (FNWM) comprises individuals from professional and academic backgrounds who have experience of and commitment to strategic and spatial planning with a particular interest in the West Midlands. Its purpose is to provide a voluntary independent network with the aim of opening up and examining key long term issues and potential futures facing the West Midlands. This current response to the Core Strategy consultation has been developed by an FNWM group of professional planners previously engaged over many years in similar strategic planning exercises in the West Midlands. The response has been endorsed by the FNWM Steering Group.

### **2. An overview of the Core Strategy Review**

The Core Strategy (CS) was approved in 2011 and FNWM acknowledges and supports the need for it now to be urgently reviewed to ensure that it provides an up to date 15 year framework for development.

Key principles underpinning the CS were first developed through the Black Country Study in 2004 and it is timely, therefore, for these principles to be re-visited and re-assessed.

**A central theme in the CS is the importance of urban regeneration and environmental renewal with a key focus on strategic centres and corridors. With positive progress being made, it is FNWM’s view that this emphasis should not only be maintained but opportunities also examined as to how this approach might be further enhanced, taking account of the latest evidence, particularly in key transport corridors.**

### **3. The need for a wider Strategic Policy context**

A key issue facing the CSR is whether and to what extent the Black Country has the capacity to accommodate development not only to meet its own growing

economic and social needs but also some provision to help meet Birmingham's unmet housing need. Given an anticipated constraint on the scale of brownfield land available, consideration is being given to the release of Green Belt land to meet these needs and a Strategic Growth Study has been initiated to examine this.

Experience shows however that, in order to properly address these issues, background analysis and the consideration of options should relate to a far wider geographical area than just the Black Country (i.e. given that journey to work and housing and labour market areas extend across the wider city-region, including areas such as Telford beyond the Greater Birmingham HMA boundary). This approach becomes even more important in the light of the WMCA's Super SEPs ambitions for growth and the need to consider the balance of development across the WMCA area in order to achieve this.

**FNWM would therefore strongly advocate that, led by the Combined Authority, urgent consideration should be given to the development of a Spatial Policy Framework (SPF) dealing not only with key cross boundary issues across the WMCA area but also providing a context for negotiations with authorities across the wider City-Region.**

This is not to suggest that work on the CSR should be halted; indeed, along with the Strategic Growth Study (GL Hearn), it can act as an important input to the assessment of options in the development of the SPF. However, key decisions regarding such matters as urban extensions, key transport corridors and the possible identification of new major employment sites should await this wider strategic policy framework being developed.

In contrast to a number of other Combined Authorities, the development of an SPF is not currently part of the WMCA's 'Devo-Deal' and would therefore need to be viewed as non-statutory guidance. Nevertheless, it would undoubtedly provide an important context for the Duty to Co-operate to operate within and indeed could form the basis for strategic level joint agreement for the WMCA area covering the broad scale and distribution between Local Authorities of housing and employment land provision.

The issue of unmet housing need has been known for a number of years and without real progress on this key strategic issue there must be a real risk that

local plans will not pass the Duty to Co-operate legal test. In the longer run, FNWM would strongly urge the WMCA to seek statutory responsibility for strategic planning.

#### **4. Black Country communities - the importance of place-making**

One of the enduring features and strengths of the Black Country is that it still contains a range of local communities with separate identities. FNWM believes that, where possible, it is important to retain these identities in a variety of ways. This can include providing support for the enhancement of local/district centres and identifying local brownfield development opportunities for a range of new housing not just to provide for local needs but also to maintain population and spending levels in support of such centres. The retail role of older centres has been severely challenged in recent decades through new trends in retailing and distribution. A key issue therefore is whether to seek to resist these trends or to seek new roles and development opportunities.

In the past, the identity of local communities has also been enhanced through the availability of local employment opportunities. However, this localised work pattern is being diluted as employment opportunities are provided further afield, including in Birmingham. If households are not to be motivated to move closer to more dispersed jobs, then improved public transport accessibility will therefore be increasingly important.

**It is for this reason that FNWM believes that the CSR should look to maximising the full development potential of existing rail and metro transport corridors and future enhancements to the network such as the Wednesbury –Brierley Hill Metro extension and the Wolverhampton-Walsall proposals.**

Development of the network in this way will therefore not only provide improved access to more dispersed jobs for Black Country communities but will also link up its strategic centres with Birmingham and HS2 stations with a greater chance of ‘irrigating’ the sub-region with associated economic advantages.

## 5. The evidence base

Supporting documents accompanying the consultation set out key components of the evidence base being used to address key issues in the CSR. Economic and demographic forecasts and projections are far from infallible guides to the future. A particular source of uncertainty surrounds international migration, which is projected to be a major driver of population growth both for the Black Country and for the wider Greater Birmingham HMA. At this stage, FNWM does not choose to challenge the assumptions being made with regard to the analysis of future housing and employment land need but would heed caution as to how such quantitative assessments are taken forward to guide policy.

**The attached paper “Evidence Paper for Planning”, submitted by FNWM to Mayoral candidates prior to the election, highlights some important perspectives at a WMCA level which are equally relevant for the CSR particularly with regard to housing.**

## 6. Housing

Important points raised in the FNWM Evidence Paper are as follows:

- a large element of the ‘real’ need for new housing is generated by younger age groups but it is within these groups that people are facing lower and more uncertain income levels and higher living costs;
- it is unlikely that, even under an optimistic economic scenario, many in this group will be able to meet their housing needs by purchase or rent in the housing market;
- at the same time, the majority of the growth in households comes from the ageing population with a 74% increase in households over 65;
- fully meeting the assessed level of need will therefore require the provision of the level of genuinely affordable, non-market housing not seen since the period 1950-1980 accompanied by a significant increase in housing designed to meet the needs of older people. Neither outcome is likely under current national policy;

In these circumstances, and given uncertainty about future volumes of international migration, the premature release of a high level of peripheral housing land around the edge of the Black Country could have a number of

detrimental impacts, particularly if it was to be dominated by private house building;

- as the market 'cherry picks' greenfield over brownfield sites, it could weaken the market for developing sites in the inner parts of the Black Country, including provision of attractive owner occupied dwellings, working against key strategic policy principles;
- much of the anticipated housing need will not be met resulting in an unjustified level of land release
- it could accentuate the existing polarised pattern of higher socio-economic groups concentrating around the edge of the Black Country leaving socially unbalanced communities in the inner core.

**Against this background, FNWM would strongly advocate that a sequential approach should be taken to identifying and releasing capacity for future housebuilding across the Black Country and indeed the wider WMCA area by:**

- a. looking to optimise new higher density housing development around stations and stops on the rail and metro network – both existing and proposed such as the Brierley Hill metro extension;
- b. examining the potential for high density housing developments in and around centres given the current changes in retailing and the contraction of demand for space;
- c. looking for opportunities to improve the quality and quantity of social housing through estate renewal programmes, including increased provision for older and vulnerable people;
- d. encouraging the relocation and expansion of businesses on to higher quality employment sites where relocation can provide environmental benefits and existing sites have potential for residential development. One particular feature of the Black Country is that it has many poor quality industrial sites in close proximity to housing, together with premises that have poor access to the strategic transport network. A high level of windfalls could therefore continue to come forward from this source over the longer term;
- e. considering potential sources of housing supply in 'overspill' locations; including larger settlements such as Telford, Worcester, Stafford beyond

the defined HMA but where migration patterns nevertheless demonstrate a housing market relationship.

**If following the completion of this sequential exercise it is evident that peripheral housing may still be required, it is the view of FNWM that options should then be examined across the wider WMCA area (particularly in key transport corridors) as part of a WMCA Spatial Policy Framework process as advocated above. If any urban extensions are subsequently proposed, these should incorporate a balance of housing provision along with appropriate levels of employment, supporting infrastructure and quality access back into the urban area.**

## **7. Employment land**

FNWM fully supports the emphasis in the WMCA Super SEP to encourage manufacturing as a key component of the economic strategy. This approach is in marked contrast to the existing BCCS and a major driver behind the need for its urgent review.

One of the recent success stories in the Black Country is clearly the development of i54 and it is important to recognise that this site was identified and brought forward for development through the formal planning system commencing with a proposal in the Regional Spatial Strategy.

The success of i54 demonstrates how the availability of sites of appropriate quality and location will remain important in attracting investment. As recognised in supporting documents, the planning system will therefore have a key role to play in ensuring that an appropriate portfolio of sites is available to meet future needs but recognising that this may have implications for the provision of sites both within the Black Country and in surrounding areas. However, given the increased emphasis on manufacturing, it will also be important to protect those existing sites that are well located and appropriate for industrial activities from competing development.

As with housing, FNWM has chosen not to challenge the assessment of future employment land requirements (i.e. leading to a shortfall 'gap' of 300ha) but, on the face of it, the overall amount required seems to be very high, and appears to ignore the potential of land being recycled. The next version of the CSR will need to be rooted on a robust evidence base and must ensure that it

addresses not only the quantity of land required but, most importantly, the quality.

**In line with this, from a wider WMCA perspective, FNWM would advocate that consideration should be given to the re-adoption of the employment land portfolio principles set out in the former RSS (i.e. identifying sites and premises to meet all market needs including a range of major strategic sites\*). If endorsed, this approach will require a wider study, contributing to the suggested WMCA SP and, if potential sites/locations are identified in or around the Black Country, this will clearly contribute to the identified shortfall 'gap'.**

(\* The RSS identified Regional Investment Sites, Major Investment Sites and Regional Logistics Sites although the range of sites required will need to be reviewed and updated to meet current and anticipated requirements).

Without a collective study of this nature, there is a danger of an oversupply of competing sites against the interests of the West Midlands especially when other sites, such as Peddimore, are coming on line at the same time. Such a study should include analysis of competing sites within major transport corridors beyond the West Midlands.

This particularly applies to B8 warehousing, where there is a need for a further rigorous analysis of supply and demand and how this might change over time, including the importance of access to rail freight services. In particular, it is noted that only 100ha of the Four Ashes sites are indicated in the Black Country portfolio but another 170ha could come forward at that site.

## **Environment**

**Environmental renewal will be crucial to the long term sustainable future for the Black Country and FNWM would fully support the integration of the Garden City concept into the CSR.**

It will also be imperative that as the review progresses the implications for carbon emissions and pollution are properly assessed and take account of the latest evidence, some of which may not have been available when the original strategy was developed.