

## **South Staffordshire Council response to the Black Country Core Strategy Issues and Options consultation**

### **Purpose and scope of the 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?**

It is acknowledged that the existing spatial strategy of focusing urban regeneration at the Growth Network has been successful. This strategy aimed to deliver regeneration in the Black Country and prevents the outward movement of people and investment from the MUA. The South Staffordshire Core Strategy was developed as a counterpoint to this and looked to limit development to meeting locally identified needs. Recent developments in the Black Country have shown this to be an effective strategy and therefore it seems sensible to explore if there is scope to stretch the existing spatial strategy in the first instance.

This acknowledged, it is clear that the challenges now faced are very different from those faced when the current Black Country South Staffordshire Core Strategies were developed. Principally, it is clear that the Black Country housing and employment shortfall (25,000 dwellings and 300ha of employment land) cannot be wholly met within the urban area and that some Green Belt release is inevitable. The NPPF (Paragraph 83) is clear that Green Belt boundaries should only be altered in exceptional circumstances, and as such, all reasonable non-Green Belt options should be fully explored. The Government's recent Housing White Paper makes it clear that demonstrating exceptional circumstances for Green Belt release is a high bar, and Green Belt boundaries should only be amended where authorities can demonstrate they have examined all other reasonable options, including effective use of suitable brownfield sites and estate regeneration. Therefore brownfield sites should be maximised as far as possible – both within and outside the existing Growth Network. Similarly, whilst recognising that estate regeneration is very challenging, if this option is not going to be pursued then the plan should set out the reasons why this is not considered a viable and deliverable option.

### **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.**

The Council agrees that all the key evidence based studies identified with Table 1 are necessary. However, which evidence based documents are required may depend on which options for growth are progressed. It is acknowledged that a Landscape Character Assessment will form part of the HMA Strategic Growth Study however a Landscape Sensitivity Study considering the relative sensitivity of land cover parcels will also be required. The Issues and Options confirms that the Core Strategy will allocate strategic sites, and therefore dependent on which options for growth are pursued, it may be appropriate to undertake an assessment of the impact on heritage assets and their setting. Historic England should be able to offer advice on this matter.

### **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.**

The housing need for the Black Country for the period 2014-2036 as identified in the SHMA is considered robust and the anticipated supply seems appropriate in line with national guidance; therefore the initial housing requirement of 24,670 is supported. The Council also supports the ongoing work to consider if there are options for surplus employment land to be allocated for housing, as well as considering the potential to increase the density of housing allocations and the limited release of surplus open space. Clearly, the Black Country authorities will need to demonstrate that the potential sources of supply within the urban area have been fully considered in order for Green Belt release to be justified.

**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.**

The recommendation that the Black Country should plan for 800ha of employment land (B1 (b), B1(c), B2 and B8 uses) as suggested within the Economic Development Needs Assessment (EDNA) appears robust and in line with national guidance. The Issues and Options paper goes on to confirm that 394ha of employment land is available or is likely to come forward in the Black Country over the plan period, including opportunities to intensify existing employment areas. It is then apparent that the Black Country authorities are seeking to rely on some 100ha of employment land in South Staffordshire when concluding that there is a residual need to identify some 300ha of employment land through the Core Strategy review.

As you are aware, South Staffordshire Council is progressing its Site Allocations Document that seeks to allocate 62ha of additional employment land at proposed extensions to i54 and ROF Featherstone to meet a proportion of the Black County's employment needs. Remaining employment land at our strategic sites is relied upon in the District's employment land supply to meet South Staffordshire needs and therefore any additional supply that South Staffordshire Council can contribute above the 62ha (including a proportion of land at West Midland Interchange should it be consented) would need to be agreed through Duty to Co-operate discussions and a Memorandum of Understanding. We will be undertaking our own EDNA next year which will consider our own need for additional employment land and will provide a clearer picture of how much additional employment land South Staffordshire could contribute towards the Black Country supply, if any. Until this work has been done and agreements have been reached about the amount of existing supply that can contribute to the Black Country need, it is not possible to say if the stated residual requirement for 300ha of employment land is appropriate. The Council would welcome further Duty to Co-operate discussions with the Black Country authorities to establish if any unmet employment land need from the Black Country can be met within the District.

**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?**

South Staffordshire Council is working closely with the Black Country authorities and others authorities within the HMA as the commissioning authorities for the Strategic Growth Study. In addition to this, the Council supports the Black Country authorities'

## Appendix 1

approach of producing a more detailed Green Belt review to inform the Preferred Spatial Options Report. Currently officers are working with counterparts from the Black Country in ensuring that the more detailed Black Country Green Belt review uses a consistent methodology with the South Staffordshire Green Belt review that will be commissioned to support our Local Plan review at an appropriate stage.

### **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?**

In the context of a partial review of the Core Strategy, the key issues as presented in Part 3 of the Issues and Options Report are considered appropriate.

### **Vision, Principles, Spatial Objectives and Strategic Policies**

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

In the context of a partial review of the Core Strategy, the Core Strategy vision and sustainability principles remain appropriate.

#### **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?**

It is considered that most of these objectives remain valid. However, as it is acknowledged that some Green Belt release will be necessary, additional objectives around delivering sustainable urban extensions, or other smaller Green Belt releases (the 'rounding off' option) may be necessary dependent on which growth option is progressed.

Considering the pressure for housing and employment land it may be that a further objective around maximising brownfield opportunities – both within the Growth Network and outside it – is required.

#### **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?**

The focus of the existing Core Strategy was to focus the majority of growth at the strategic centres and regeneration corridors, known collectively as the Growth Network and set out in Policy CSP1, and to see more limited growth outside the Growth Network and reflected in Policy CSP2. It is therefore agreed that such overarching policies should be retained and updated to reflect new evidence.

Considering the requirements for new housing and employment land, it is welcomed that the Issues and Options Report acknowledges that Policy CSP2 will be amended and subject to significant change in order to accommodate housing and employment land and to reflect proposed changes to the Black Country Green Belt. As stated in response to Question 1, all reasonable options should be considered and therefore fully exploring development options outside the existing Growth network, both Green Belt and non - Green Belt, is essential.

### **Reviewing the Spatial Strategy**

**Stage 1: Strategic Options 1A and 1B – continuing the role of the Growth Network**

**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?**

The Council supports the Black Country authorities in re-examining the boundaries of the regeneration corridors to explore whether this could result in additional sites for housing and/or employment land.

**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?**

Whilst there may be scope for the release of some occupied employment land for housing in certain locations in the Growth Network (Strategic Option 1B), the loss of employment land would need to be offset in the Green Belt and therefore this option is unlikely to reduce the loss of Green Belt overall. It is also acknowledged that there are likely to be delivery and viability issues around Option 1B. On this basis, the bulk of the remaining housing and employment needs are likely to need to be met outside the Growth Network (Strategic Option 1A). However, before this is concluded, the authorities will need to demonstrate that there are no other deliverable sources of supply (e.g. estate regeneration) within the Growth Network.

**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.**

No comment.

**Stage 2: Strategic Options 2A and 2B – Housing and Employment outside the urban area**

**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.**

It is noted that both options outside the Growth Network (Strategic Option 2A and 2B) would involve Green Belt release. As stated in response to questions 1 and 16, all reasonable non-Green Belt options should be explored, and therefore the authorities will need to demonstrate that there are no other deliverable sources of supply (e.g. estate regeneration and increasing development density) within the urban area outside of the identified Growth Network. Once this has been demonstrated, it is considered that exploring a combination of Spatial Options H1 and H2 will need to be explored.

As Spatial Option H1 would see the 'rounding off' the edge of the Green Belt, including internal Green Belt wedges, it is envisaged that this will see the release of a number of small to medium sized sites. Considering the upfront infrastructure delivery for Sustainable Urban Extensions (SUEs) (Option H2) it is considered that from a delivery perspective, a number of these smaller 'rounding off' sites will need to come forward to ensure housing is being delivered over the short term (0-5 year period). The Issues and Options report confirms that this 'rounding off' option may not yield sufficient capacity to accommodate all the growth needs, and if this is the case, then a combination of 'rounding off' sites, as well as SUEs, are likely to be required to meet the growth requirements.

## Appendix 1

In terms of what criteria should be used to select such sites, this must be evidence led. Of particular importance will be the outcomes of the Strategic Growth Study and Black County Green Belt Review in terms of the contribution that these sites play to the Green Belt. A Landscape Sensitivity Study will also be a key piece of evidence for determining the degree of landscape sensitivity, to ensure that areas of very high sensitivity remain undeveloped where possible. Access to services and facilities will need to be considered, however these sites by their nature will adjoin the urban area, and therefore in most cases there is likely to be adequate access to amenities. It is not considered that a size threshold should be imposed on these 'rounding off' sites; however sites should follow defensible boundaries, such as existing roads, watercourses and hedgerows where possible.

An important consideration when considering options for growth will also be the Cannock Chase SAC. The Council welcomes the continued involvement of the relevant Black Country authorities in the Cannock Chase SAC Partnership through the Core Strategy Review process. Any development proposals in the Core Strategy Review need to come forward in accordance with the most up to date evidence to ensure that development does not have an adverse impacts on European protected sites.

**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).**

To reiterate, it is important that site selection is evidence led, and therefore crucially, it is essential that all sites/areas with 'rounding off' potential are considered. This includes areas that haven't been put forward through the 'call for sites' but perform well in planning terms based on the evidence undertaken. Where necessary, land searches/land assembly should be undertaken to ascertain if these sites are available and deliverable.

**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.**

As set out in response to Question 12a, there is likely to be a requirement to allocate SUEs to meet the identified growth requirements in addition to smaller 'rounding off' sites. However, it is unclear if this option includes options for new standalone settlements in the Green Belt, or will just focus on SUEs that adjoin the urban area. It is suggested that, considering the scale of the housing and employment requirements, new standalone settlements could be considered at this early stage of plan preparation under this option.

It is considered that any SUE would need to provide a mix of house sizes and specialist housing (for example for the elderly) where there is evidence of need, and an appropriate level of affordable housing. The Council also believes there are options for new employment land to be allocated within SUEs. In particular there may be scope for modern industrial units aimed at SME businesses offering supply chain opportunities to serve established businesses in the area. Clearly sustainable development principles should be followed with good access to amenities, public transport, employment opportunities, sport and recreation and other green infrastructure.

An important consideration when considering options for growth will also be the Cannock Chase SAC. The Council welcomes the continued involvement of the relevant Black

## Appendix 1

Country authorities in the Cannock Chase SAC Partnership through the Core Strategy Review process. Any development proposals in the Core Strategy Review need to come forward in accordance with the most up to date evidence to ensure that development does not have an adverse impacts on European protected sites.

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

It is suggested that SUEs would typically need to be in excess of 750 houses to facilitate a primary school and it is likely that developments would need to be larger than this (in excess of 1000) to provide a local centre. A self-contained development is likely to be in excess of 2000 -2500 homes; with 5000 homes the typical threshold to facilitate a new high school.

### **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?**

It is important that site selection is evidence led, and therefore it is essential that all sites/areas with potential to accommodate an SUE are considered. This includes areas that haven't been put forward through the 'call for sites' but perform well in planning terms based on the evidence undertaken; for example the Strategic Growth Study, any further fine grain Green Belt assessment, Landscape Sensitivity Study and market capacity evidence. Where necessary, land searches/land assembly should be undertaken to ascertain if these sites are available and deliverable.

### **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?**

The Council supports the Core Strategy setting out detailed guidance and broad parameters for design and layout of SUEs, including the type of tenure of housing, employment land requirements, infrastructure and service provision and open space requirements etc. It may be that these requirements are set out in a proforma for each proposed SUE, which then hooks to the relevant SUE allocation policy.

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

As set out in previous responses, if Green Belt release is proposed then the authorities will need to demonstrate that all reasonable non-Green Belt alternatives have been considered. This should include exploring funding opportunities to deliver constrained brownfield sites, increasing site densities within the urban area and exploring any opportunities for estate regeneration.

As set out in response to Question 13a, at this early stage of plan preparation, Spatial Option 2a should consider options for new standalone settlement as well as SUEs that adjoin the urban area.

## **Meeting housing needs outside the Black Country**

**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?**

If it is clearly demonstrated that housing need cannot be met within the Black Country by carrying out a robust and transparent assessment of all non-Green Belt and Green Belt options, then it is acknowledged that some of this housing growth will need to be exported to other authorities within the Greater Birmingham HMA. This could potentially be to neighbouring HMAs should it be robustly demonstrated that the shortfall cannot be met within the Greater Birmingham HMA. The Strategic Growth Study will provide an indication of where opportunities may exist outside the Black Country and these opportunities could then be explored further by the relevant authority through local evidence gathering.

It is clear that there are significant pressures for new housing, employment and Gypsy & Traveller provision and these key cross boundary issues will need to be addressed through our respective local plans. It is the Council's firm view that this is a two-way negotiation and the role that South Staffordshire might play in this regard needs to be very carefully explored. An equitable and fair approach, which recognises the environmental, physical and infrastructure constraints, as well as the availability of sites to meet specific needs, should be robustly evidenced when addressing these issues under the Duty to Cooperate.

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

Potential locations outside the Black Country, similar to considering options for 'rounding off/SUEs within the Black Country, should be evidence led. Therefore, this could include areas that haven't been put forward through the 'call for sites' but perform well in planning terms based on the evidence undertaken; for example the Strategic Growth Study, any further fine grain Green Belt assessment, Landscape Sensitivity Study and market capacity evidence. Where necessary land searches/land assembly should be undertaken to ascertain if these sites are available and deliverable.

**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.**

Whether development is delivered within the Black Country or is exported elsewhere it will need to comprise sustainable development that meets the needs of the people who live there. If housing is exported, it will be for the LPA(s) in question to allocate sites through their Local Plan alongside appropriate infrastructure having undertaken a Sustainability Appraisal to ensure that sustainable development is being achieved.

**Strategic Option Area 2B – accommodating employment land growth outside the urban area**

**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) If you think that are any potential locations that should be considered please provide details (please submit specific sites through the 'call for sites' form).**

The Council supports Spatial Option E1 of extending the Black Country's existing employment sites on the edge of the urban area into Green Belt land where it is demonstrated that there is insufficient options for employment land within the urban

area. It is considered that there is a need for a mix of employment sites, both in terms of use class, size and quality. Overall, it is likely that the authorities will need to provide a range of employment land from sites aimed at large advanced manufacturing companies, through to small scale modern fit for purpose industrial units aimed at existing SMEs and start-up businesses.

In most instances, good access to the strategic road network is a key criterion, particularly for logistics companies, however for more local quality manufacturing this may be less of a factor. Access to labour markets, including accessibility to employment via public transport is also seen as key site selection criteria.

**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? If you think that are any potential locations that should be considered please provide details (please submit specific sites through the ‘call for sites’ form).**

The Council supports Spatial Option E2 of providing new freestanding employment sites in sustainable locations in the Black Country’s Green Belt where it is demonstrated that there is insufficient options for employment land within the Black Country urban area. New freestanding employment sites are more likely to be aimed at larger advanced manufacturing and/or distribution companies and therefore good access to the strategic road network is seen as key. Again, access to labour markets, including accessibility to employment via public transport is also seen as key site selection criteria.

**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) If you think that are any potential locations that should be considered please provide details (please submit specific sites through the ‘call for sites’ form).**

The Council supports Spatial Option E3 of providing new employment land within Sustainable Urban Extensions (SUEs) in the Green Belt where it is demonstrated that there is insufficient options for employment land within the urban area. In particular, there may be opportunities within SUEs to provide modern industrial units on new business parks as part of a sustainable mixed use development. These are more likely to be aimed at existing SMEs and start-up businesses.

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

The Council acknowledges that alongside the other three spatial options, there may be a requirement to export employment growth to neighbouring areas. It is acknowledged that South Staffordshire has strong economic links with the Black Country as demonstrated by the fact that our emerging Site Allocations will provide an additional 62ha of employment land to meet Black Country needs.

The Black Country EDNA concludes that South Staffordshire and Birmingham are the areas with the strongest economic links to the Black Country, but acknowledges that there are also links with other adjoining areas e.g. Lichfield, Cannock and Bromsgrove. Clearly, the employment land requirements for the Black Country are significant, reflecting the growth aspirations of the Black Country and wider West Midlands Combined Authority. Considering the scale of the need, if it is demonstrated that Spatial Option E4 is an appropriate option, then options to export to all neighbouring authorities with an economic relationship to the Black Country should be considered under this option.

**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)**

It is agreed that good access to the strategic road network with good sustainable public transport links are important factors if the export option was to provide large scale freestanding employment site(s). Further, consideration should also be given to which communities in the Black Country the sites will serve. Clearly, sites on the northern edge of the Black Country are less likely to serve residents in Dudley and Sandwell and vice versa. Therefore, if employment sites are provided outside the Black Country then this should be done in a way that avoids the overconcentration of sites in one area.

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

No other options are suggested at this stage. It may be the case that a combination of all options is needed to meet the Black Country employment requirements. As set out above, assuming that the export option is required, all neighbouring authorities with an economic relationship to the Black Country should be considered under Spatial Option E4.

**Delivering Growth – Infrastructure and Viability**  
**Introduction and scope**

**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.**

It is agreed that the policy may need to be reconsidered. Where Green Belt release for SUEs/employment land is proposed then it may be that there is a hook in the policy to link to site specific proformas/development briefs for these sites. These could clearly set out what infrastructure is required to be delivered, both on and off site.

**Social Infrastructure**

**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.**

We have no evidence with regard to social infrastructure needs in the Black Country.

**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.**

We have no evidence with regard to surplus social infrastructure provision in the Black Country.

**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.**

We have no evidence with regard to social infrastructure needs in the Black Country. However, it is acknowledged that new housing will put pressure on social infrastructure both within the Black Country, and the surrounding local areas and therefore the authorities will need to engage carefully with cross boundary social infrastructure

## Appendix 1

providers to ensure that they understand the 'tipping point' at which new development will facilitate the need for additional social infrastructure provision.

**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.**

See response to Question 24.

### **Physical Infrastructure**

**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.**

We have no evidence at this stage with regard to physical infrastructure needs in the Black Country.

**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.**

We have no evidence with regard to physical infrastructure needs in the Black Country. However, it is acknowledged that large scale new development (for example SUEs) are likely to require substantial upfront infrastructure 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?**

See response to Question 27.

### **Delivery and Viability**

**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.**

Clearly infrastructure provision through Section 106 and 278 agreements and CIL will be essential. No other tools or interventions are suggested.

**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.**

It is considered that in order to maintain the urban regeneration strategy, a brownfield first approach should be explored to its fullest extent. Therefore, all funding options should be explored to try and deliver as many problematic brownfield sites as possible.

### **Funding for Site Development and Infrastructure**

**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?**

Both private and public sector investment will be needed to deliver the Core Strategy. The availability of funding sources will impact on viability, and therefore robust viability,

delivery and infrastructure studies will be needed when determining if the proposed Core Strategy policies are feasible.

### **Review of Existing Core Strategy Policies and Proposals**

#### **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**

It is agreed that spatial planning and place making does have a key role in improving the health and wellbeing of residents and therefore incorporating a health and wellbeing into the Core Strategy is fully supported.

**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?**

A number of policy areas, e.g. open space and sports provision, affordable housing delivery tie in with the health and wellbeing agenda and these will be picked up in other Core Strategy policies. There may however be a role for overarching health and wellbeing policy that ties these together to ensure it is clear on how development will be expected to contribute towards healthier communities.

**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?**

Undertaking a Health Impact Assessment for large developments in addition to considering their impact through the Sustainability Appraisal (SA) is supported.

**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?**

Applying good practice design principles, including provision of on site open space and links to existing green infrastructure will be essential. It is also important that larger schemes to include facilities for children's play and youth development.

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

##### **Policy HOU1 - Housing Land Supply**

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

The proposed approach to housing land supply is supported.

##### **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?**

## Appendix 1

The Council supports the proposal to increase the minimum net density of 35 dwellings per hectare to maximise brownfield housing delivery. Densities should be reconsidered through the emerging viability and delivery evidence and efficient use of land be promoted.

### **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**

The authorities should consider lowering or removing the threshold for applying density standards as in many instances high densities may also be appropriate for small sites of less than 15 dwellings.

### **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?**

The site size threshold could be reduced to less than 11 if there is evidence to suggest that this will not impact on deliverability.

### **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?**

It is important that efficient use of land is encouraged so as to limit Green Belt release as far as possible, particularly given the Housing White Paper's requirement to limit the need for Green Belt release by optimising the proposed density of development. Therefore, where Green Belt release has been shown to be necessary, the minimum net density of any Green Belt release should not be set below the standards for the adjacent urban area.

### **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.**

As locations for residential development will principally focus on sites within the urban area or Green Belt locations on the edge of the urban fringe, it is considered that none of these locations will be isolated with fundamental accessibility concerns. Therefore, separate accessibility standards for different types of development are not considered necessary. With regard to affordable housing, this should be provided on site where possible.

### **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.**

Yes.

### **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:**

Yes.

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

## Appendix 1

Considering the low numbers on the register currently (nine for the entire Black Country), It may be most appropriate to set a target for each authority, rather than a percentage requirement for each large development coming forward. One potential approach could be to extrapolate need evidenced from the base periods to date, in order to determine how many plots each authority should be providing over the plan period.

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

See response to Question 41b.

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

See response to Question 41b.

### **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.**

No comment.

## **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.**

It is agreed that the annual affordable housing target should be directly informed by the 2017 SHMA.

### **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.**

It is agreed that the threshold requiring sites to provide a proportion of affordable housing set out in Policy HOU3 should be lowered to 11 homes or more in line with Government guidance.

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

See response to question 43a.

### **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?**

A requirement for 25% affordable housing seems reasonable considering the viability constraints that may be associated with some sites. This is also in line with the requirement identified in the SHMA.

### **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?**

It may not be necessary to increase the affordable housing percentage requirement in order to increase the provision of affordable home ownership now that the Housing White paper appears to have removed the specific requirement to deliver starter homes

## Appendix 1

(20%) on all sites over a certain threshold. The 10% requirement for affordable home ownership products can be met within the proposed 25% affordable housing policy. The split within this between shared ownership, starter homes and other types of affordable home ownership could then be dealt with by negotiation, considering the comments in 6.37 which note that most starter homes in the Black Country would not necessarily be genuinely affordable in all areas. This would also still leave a 15% requirement for rented products, which is only marginally below the 16.6% recommended in the SHMA.

### **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.**

The SHMA confirms that the Black Country authorities should aim for 28.6% (23.3% if starter homes are excluded) of new housing to be affordable housing; therefore on this basis there may be limited scope to go above 25% on greenfield sites. However, considering that these could be large sites that would need substantial onsite infrastructure provision then a cautious approach should be taken to going above 25%. Setting an appropriate percentage should be directly informed by a high level viability study.

### **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.**

The targets set out in Tables 4 and 5 are taken from the Black Country and South Staffordshire GTAA 2017 and therefore are deemed appropriate for identifying the Black Country's pitch/plot requirements. However, as you are aware the 2017 GTAA identified a pitch requirement of 87 residential pitches for South Staffordshire for the period 2016-2036, considerably above the pitch requirements for the four Black Country authorities combined. Historically, pitch provision in South Staffordshire has been in the Green Belt as no non-Green Belt options have ever been promoted. Therefore, assuming that this remains the case, there will be a requirement through our Local Plan review to demonstrate that we have explored other reasonable options to amending Green Belt boundaries including exploring whether other authorities can help to meet some of the identified development requirement, as set out in the Housing White Paper. As such, there will be a requirement through Duty to Co-operate discussions to explore whether there may be deliverable brownfield options in the Black Country to meet a proportion of the districts pitch requirements. On this basis, a flexible approach to setting pitch targets and exploring pitch/plot options is suggested.

It is clear that there are significant pressures for new housing, employment and Gypsy & Traveller provision and these key cross boundary issues will need to be addressed through our respective local plans. It is the Council's firm view that this is a two-way negotiation and the role that South Staffordshire might play in this regard needs to be very carefully explored. An equitable and fair approach, which recognises the environmental, physical and infrastructure constraints, as well as the availability of sites to meet specific needs, should be robustly evidenced when addressing these issues under the Duty to Cooperate.

### **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.**

Expanding Policy HOU5 to include a criteria based approach which requires service providers to demonstrate why health care and education facilities are no longer required or viable is welcomed. It is agreed that this approach should be expanded to other types of social infrastructure such as community centres.

Including standards for built social infrastructure to serve major housing developments set out in Policy HOU5 is also considered appropriate.

**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.**

This policy should be reviewed to reflect a clear criteria based approach to considering the loss of social infrastructure, and should be expanded beyond health and educational facilities where appropriate. One of these criteria could relate to ensuring that the developer demonstrates that there is adequate alternative provision to meet the needs of the community.

**Policy Area C - The Black Country Economy**

**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.**

The existing wording for Policy DEL2 seems very broad, setting out completions to date and how many are expected to come forward within each regeneration corridor. A clearer approach may be to specifically identify areas of Local Quality Employment Land that is considered poor quality and therefore suitable for release for housing, either through a revised Core Strategy policy or through allocation documents.

**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.**

A revised policy could set out areas of poor quality employment land that could be suitable for release for housing or alternative uses, providing clarify on what uses may be acceptable.

**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.**

It is considered that the authorities themselves are best placed to decide if there is any value in setting a target for the total employment stock within the Black Country. Setting a target for the additional employment land that is required is a clearer approach; however if possible, there may be a need to have a mechanism in place to ensure that any loss of existing high quality sites to other uses is compensated by new provision

## Appendix 1

reflected in updated targets. Robust monitoring and national guidance encouraging authorities to review plans in whole or part every 5 years should ensure that any issues around the loss of existing high quality employment land can be addressed.

### **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?**

The criteria used to define High Quality Employment Areas are supported. There may however be scope to slightly amend the accessibility criteria to focus on good access the strategic road network, rather than just focusing on access to the motorway network.

**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?**

The criteria used to define High Quality Employment Areas are supported.

**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?**

The High Quality Employment Areas should be focused on advanced manufacturing and logistics and be protected for these uses.

### **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?**

Removing the requirement to have a 'reservoir' of readily available shovel ready employment land is supported. The provision to review plans in whole or part every 5 years will help ensure that there is a constant supply of employment land, providing scope to allocate additional employment land if required. Ensuring provision for a balanced portfolio of sites is important

### **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.**

Policy EMP5 encourages the use of planning objections to be negotiated with developers of new job creating development in order to support recruitment and training of local people. This approach is fully supported as access to a skilled workforce is a key consideration for businesses.

### **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**

Updating the list of visitor attractions and facilities in Policy EMP6, which seeks to develop the visitor economy and cultural facilities of the Black Country is supported.

## **Policy Area D - The Black Country Centres**

### **Policy CEN1: The Importance of the Black Country Centres for the Regeneration Strategy**

**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.**

Merging these policies relating to the town centres seems logical.

**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.**

The Council has no evidence to suggest that the hierarchy of centres is not appropriate. However, the Retail Capacity and Town Centre Uses studies should be used to inform the hierarchy. It is recognised that a number of the Black Country centres – particularly the strategic centres – play an important role in meeting the higher order needs of our residents including access to hospitals, retail and leisure. Therefore, their continuing regeneration is fully supported.

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

From the Council's knowledge, It appears that all the appropriate centres within the Black Country have been identified.

**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? Please explain why.**

We have no evidence on the performance of centres or relating to their level within the hierarchy of centres.

**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?**

As an indicative rule, development of around 1000 houses or more are likely to require a new centre. Therefore, if the evidence suggests a need for new developments around this scale then clear criteria for the creation of new centres will be required. It may however be appropriate to have site specific infrastructure requirements for large strategic allocations (e.g SUEs) identified in the Core Strategy. These would include the requirements for new centres.

### **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?**

It is logical for the existing strategic centres such as Wolverhampton and Brierley Hill to be the focus for retail, office and commercial leisure development. This is important for their continuing regeneration.

**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?**

It is agreed that retail and office floorspace needs should be revisited.

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

We have no evidence to confirm if there is a need to set a target for convenience retail floorspace. The proposed Retail Capacity and Town Centre Uses studies should be used to inform this.

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

Targets for leisure development may be appropriate where supported by evidence of need. It may be appropriate to undertake an audit of sports facilities as part of this evidence gathering and consider cross boundary provision dependent on the evidence of need/demand. If this is deemed appropriate then close liaison with Sports England is recommended.

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

The authorities will need to demonstrate that they have fully considered options for additional housing in the strategic centres, whilst recognising that other uses such as retail will also be the focus of these centres. The Council supports the authorities setting new housing targets for the strategic centres.

**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.**

Retail, offices, housing, leisure and cultural facilities should be the focus of the strategic centres.

**Brierley Hill Retail Pre-Conditions**

**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?**

The Core Strategy review is considered the correct time to re-examine any conditions relating to retail growth at Merry Hill.

**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.**

It is considered appropriate to encourage convenience shopping and other mixed use development (e.g. community centres) to support new residential development within the strategic centres.

**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.**

No specific suggestions.

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

**Policy CEN5: District and Local Centres**

The authorities will need to demonstrate that they have fully considered options for additional housing in the strategic centres, whilst recognising that other uses such as retail will also be the focus of these centres. The Council supports the authorities setting new housing targets for the town 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.**

Flexibility of uses is encouraged in the Local Centres.

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

No specific suggestions.

**The Centres Threshold Approach**

**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.**

No comment.

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

No comment.

**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.**

The approach of protecting local shops and small parades unless it can be demonstrated that they are no longer viable is supported. The authorities may want to consider setting

## Appendix 1

out clear expectations on what evidence would be required to justify the applicants viability case.

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

No comment

**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.**

Clarification that the policy applies to edge-of-centre and out-of-centre locations is supported

**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**

No comment

**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**

No comment.

### **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.**

This approach seems appropriate.

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

No comment.

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

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

No comment.

**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.**

No comment.

**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.**

No comment.

**Other Centres 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.**

No specific suggestions.

**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.**

As retail trends continue to change with the continued expansion of online shopping it is essential that Local Plan policies on centres strike the correct balance between ensuring that town centres uses cannot be too easily lost, whilst also ensuring there is flexibility to adapt to changing retail trends. Where retail, leisure or other commercial uses are not viable then reallocating these for housing or employment uses would be supported.

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

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

The overall transport strategy of providing better use of existing capacity as well as providing new sustainable transport capacity to provide an integrated transport system for the West Midlands is supported. Achieving this will help support the Core Strategy Spatial Objectives.

**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.**

The updated transport priorities in TRAN1 are generally supported. However, reference of 'development of road to freight interchange facilities to serve the sub region' is vague. It is unclear if this is making specific reference to the development of a Strategic Rail Freight Interchange (SRFI), which by the Government's definition is an Interchange in excess of 60ha and capable of handling 4 trains a day, or a number of smaller RFI facilities within the Black Country. That said, Paragraph 6.1.40 of the Issues and Options makes specific reference to rail freight interchanges proposals coming forward at Bescot and Four Ashes (currently being promoted as West Midlands Interchange (WMI)) which suggests that the transport priority relating to rail freight at Para 6.1.36 may relate specifically to Four Ashes. As you are aware, the WMI proposal is in the Green Belt and is still at the pre-application stage and therefore any transport priorities that relate to this proposal are considered premature.

**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.**

## Appendix 1

Proposed changes to reference greater focus on choice of modes of transport for access to new developments, including electric vehicle charging infrastructure, provision for cycles etc. is supported.

### **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.**

The proposed change to Policy TRAN3 is to remove reference to the 'principle road network' to be replaced with reference to the 'key route network' which is defined in the West Midlands Combined Authority 'movement for growth' plan. It is our understanding that the 'key route network' is a term used to describe the metropolitan main road network. The current reference in the policy is as follows:

*Proposals which generate significant freight movements will be directed to sites with satisfactory access to the principal road network.*

It is unclear from the Issues and Options report if this change is simply to provide consistent terminology with that used in the WMCA transport plan, or if this will result in a material change to the policy. Specifically, it is unclear if the reference to the principal road network was referring specifically to the road network within the Black Country? Whereas the 'key route network' seems to refer to a wider area across the region. Clarification on this would be welcomed.

### **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.**

The approach of providing a coherent network for walking and cycling is supported.

### **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.**

The proposed inclusion of priorities in Policy TRAN5 around introducing new transport technologies such as ultra low emission vehicles is supported.

## **Policy Area F - The Black Country Environment**

### **Environmental Infrastructure and Place-Making**

**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 proposed changes to environmental policies to reflect adopted DPDs and include new proposals to address the environmental infrastructure needs of new developments in light of up-to-date evidence seems appropriate.

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

## Appendix 1

Good plan making objectives such as providing comprehensive green infrastructure, integrated and accessible transport networks, access to employment and affordable housing provision are amongst those that make up the garden city principles. These requirements will be picked up through applying the relevant individual policies.

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

There may be more scope to apply the garden city principles on larger greenfield sites. Considering that there may be viability issues on some brownfield sites, it may be less realistic to apply the garden principles on these sites.

### **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?**

Updating the policy in line with the NPPF and the introduction of requirements for new development to incorporate biodiversity features, such as new natural green space, is supported.

### **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.**

Updating the policy in line with the latest national policy and guidance is supported.

### **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.**

Removing reference to requiring a specific code of sustainable home in line with national guidance is supported.

#### **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.**

This is considered for the authorities to decide in consultation with the water companies.

#### **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.**

Introducing an access standard so that a percentage of new builds would be usable or easily adaptable for those with disabilities is supported. However, in terms of the threshold of where this percentage is set, this would need to be informed by viability evidence. It may be that it would not be viable to apply this policy on certain types of sites e.g. small brownfield sites; again this could be considered in the viability evidence.

**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.**

Applying the Nationally Described Space standard (CLG, March 2015) is supported should the evidence suggest that this would not impact on viability.

**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.**

It may be appropriate to have different standards for brownfield and greenfield; this could be considered in the viability evidence.

#### **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.**

It is understood that part of the route of the Hatherton Branch Canal is safeguarded in proposed Policy EN4 of Walsall's Site Allocations Document. On this basis it is considered appropriate to remove reference to the restoration of the Hatherton Branch Canal from the Core Strategy, and for this to be considered at the more local level.

#### **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?**

The propose changes to align with national policy and guidance is supported.

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

None suggested.

#### **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**

It is not clear what specific changes are proposed, however if the existing policy is in line with national policy then it may be that the changes needed are minimal.

**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**

It is considered that paragraph 74 of the NPPF offers sufficient protection from development for open space.

**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.**

## Appendix 1

None suggested.

### **Policy ENV7 - 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**

Increased energy efficiency standards for non-domestic buildings would be supported; however this would need to be supported by plan viability evidence confirming that this is achievable.

**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.**

Any percentage requirement relating to energy demand would again need to be supported by plan viability work.

### **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.**

Rewording the policy to reflect the approach in the more recent Black Country wide SPD on Air Quality and the West Midlands Low Emissions Towns and Cities Programme (WMLETCP) seems appropriate.

### **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.**

No comment.

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

No comment.

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

No comment.

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

None suggested.

**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.**

Appendix 1

No comment.

**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?**

No comment.

**Policy Area H - Minerals**

**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?**

No comment.

**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?**

No comment.

**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?**

No comment.

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

No comment.

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

No comment.

**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?**

No comment.

**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.**

No.

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

No.

**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.**

No comment.

**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?**

No comment.

#### **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?**

Updating Appendix 2 and tables 2 and 3 of the existing Core Strategy to reflect proposals in the adopted and merging SADs and AAPs is supported.

#### **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**

Streamlining the monitoring framework to focus on the key quantitative indicators which relate to the delivery of development is supported.

**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.**

If the authorities are required to allocate Green Belt sites then a new policy for this will be needed. It is likely that a proforma will be needed for each allocation setting out what will need to be delivered on site that hooks to the policy.