

Thank you for the opportunity to respond to the Black Country Core Strategy Issues and Options Report.

As Stafford Borough is a neighbouring authority to South Staffordshire District and Cannock Chase District a number of the Spatial Options within the Report could have development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham and Black Country Housing Market Area, nor the Greater Birmingham & Solihull LEP or Black Country LEP areas. In particular the Habitat Regulations Assessment of future housing growth in the Black Country may need to be addressed in order to provide mitigation measures for the Cannock Chase Special Area of Conservation together with implications for the wider Cannock Chase Area of Outstanding Natural Beauty.

Based on the Strategic Challenges and Opportunities, the Borough Council is generally supportive of the vision, principles, spatial objectives and strategic policies within the Issues and Options document. However it is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the Black Country area. Clearly it is important that the local population needs within the Black Country are accommodated by the delivery of new developments to reduce out-migration and pressure on the strategic transport network.

In terms of the approach for accommodating growth it is noted that the Black Country are continuing the role of the Growth Network and Regeneration Corridors from the adopted Core Strategy. However this will require the delivery of brownfield sites across the Black Country which experience a range of infrastructure, historic contamination and viability constraints impeding the level of development achievable. Therefore it would appear that options associated with Stage 2 including Green Belt release within the Black Country, either through rounding off or Sustainable Urban Extensions will be required to meet housing and employment development requirements. The implications of these Stage 2 options could be a significant net outflow of residents and economic activity away from the Black Country's Strategic Centres towards other areas, putting additional pressure on transport links.

It is noted that within the Spatial Options is a section on 'meeting housing needs outside the Black Country', firstly in neighbouring authorities or secondly exported outside of the Housing Market Area. Notwithstanding the impact on the Black Country through the loss of economically active population, both of these 'export' options could have implications for Stafford Borough. If additional housing growth is accepted by South Staffordshire District there is the potential for non Green Belt areas south of Stafford, but in South Staffordshire District, being considered through a Local Plan Review process leading to infrastructure pressures on the County Town of Stafford. A recent example of this scenario has been highlighted by a planning application for 200 new homes immediately adjacent to Wildwood, Stafford but within South Staffordshire District. From the employment perspective the proposed Strategic Rail Freight Interchange development in South Staffordshire District is being promoted in order to provide for the Black Country's unmet logistic needs, which demonstrates the challenge of delivering suitable sites within the Black Country area and the outward movement of economically active people.

The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council has recently initiated a Local Plan Review to set out the future development strategy beyond the adopted Plan period of 2031. Therefore if it is considered necessary to deliver development in other areas the Borough Council would welcome an opportunity to discuss the implications of this

approach in more detail, to ensure the infrastructure implications are considered in balance with achieving housing and employment needs across a wider area.

The Borough Council would welcome acknowledgement of this consultation response and a continuing updates on the progress of the Black Country Core Strategy, including opportunities to engage in the process going forward.

I look forward to hearing from you in due course.

Alex Yendole
Planning Policy Manager
Stafford Borough Council