

[REDACTED]

From: [REDACTED]
Sent: 07 September 2017 16:58
To: Blackcountrycorestra
Subject: Black Country Core strategy issues and options representations from CCDC
Attachments: [REDACTED]
[REDACTED]

Please see attached the representations of Cannock Chase Council to the Black Country Core Strategy issues and options consultation.

I would be grateful if you could confirm receipt

Kind regards

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Black Country Core Strategy

'Have your Say' Response Form

We want your views on the future of the Black Country. This form is to help you to comment on the Black Country Core Strategy Issues and Options Consultation. The document is available on the website at:

www.blackcountrycorestrategy.dudley.gov.uk

How to complete this form: We have set out a number of questions in the Issues and Options document that we would like you to answer. You can answer as many or as few questions as you like. You can also make comments on any other part of the plan or supporting evidence and documents. This form is provided as a single box. If you are making representations of different sections of the Issues and Options document please use a separate box for each question or chapter.

Where possible please submit evidence to support your views. This can range from a personal explanation behind your choice of option, to detailed figures from a piece of published evidence. If you are submitting detailed supporting evidence it would be helpful if you could include the title, author and date of the document(s). Any supporting evidence can be attached to this form or submitted as a separate document.

How to submit your comments: Please complete this form and return it by **5pm 8th September 2017**. Any comments received beyond this date might not be taken into account. This form and any other documents you might wish to provide can be sent by email to blackcountrycorestrategy@dudley.gov.uk or by post to:

Dudley Council
Council House
Priory Road
Dudley
DY1 1HL

If you require this form in an alternative format please contact 01384 814136 or
blackcountrycorestrategy@dudley.gov.uk

Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.

| |
|--|
| Chapter / Page / Question / Paragraph |
| Do you agree or disagree with the approach set out in the relevant section and / or question? |
| Comments (continue on a separate sheet if necessary) |
| Please see attached response sheet |

Black Country Core Strategy

Issues and Options consultation July – September 2017

Response of Cannock Chase Council

Thank you for consulting Cannock Chase Council with regard to the first stage (Issues and Options) of the Black Country Core Strategy Review. Responses in relation to those questions of particular relevance to this District are set out below.

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?

This is difficult to conclude at this stage as much will depend on the emerging evidence as is acknowledged in paragraph 1.18. It is possible that some policies may be able to be 'stretched' or even stay the same, but in some cases significant changes may need to be made which could have cumulative impacts including cross-boundary implications, particularly in the light on ongoing work through the Greater Birmingham Housing Market Area (GBHMA) and the LEPS / WMCA.

It is noted that paragraph 1.27 (and 4.34) allows for sites to be put forward (via the Call for sites process) which lie within other authorities but adjoining the Black Country to enable cross boundary discussions to take place. As stated in paragraph 1.27, those sites would need to also be submitted to the relevant authority within whose boundaries the site lies (either all or in part) as these would also need to be considered through the Local Plan process for the authority in question. In these instances discussions would need to be had through the Duty to Co-operate in the context of the emerging evidence base, ongoing strategic work as referenced above, and through any appropriate local plan reviews.

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? 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 impression is given on page 19 that the GBHMA study primarily relates to Green Belt but its scope is wider than that and the table should reflect the full scope of the study.

The above mentioned study includes landscape assessment which complements, but is a separate assessment to the Green Belt work. However, given the cross boundary implications, account should be taken of Landscape Character Assessment at the more localised level where such evidence exists. Cannock Chase Council has published (and updated) its Landscape Character Assessment so this will need to be given due consideration as work on the plan moves forward, as will consideration of other evidence of relevance such as that relating to the historic environment / landscape and setting. Further discussions on these matters would be welcomed as the detail of the plan starts to emerge.

Further discussion will be needed on transport to ensure that the full evidence base and most up to date situation is considered in relation to the appropriate stage of the plan.

It should also be noted that the evidence base on Cannock Chase SAC is in the process of being updated and so the Black Country authorities will need to continue to engage (as they currently are doing) in this process via the Cannock Chase SAC partnership. This is covered under key issue 5 and also in paragraph 3.61 but needs to be cross referenced to the evidence table.

Discussions are also ongoing in relation to the Cannock Extension Canal SAC and also the restoration of the line of the Lichfield and Hatherton canal and it is possible that further evidence may be required in relation to this and the advice and guidance of Natural England will be essential as the plan progresses, particularly if there are cross boundary implications from the emerging plan so dialogue under the Duty to Co-operate will need to be ongoing (again as already is the case).

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?

Paragraph 3.18 references the agreement to test the accommodation of an extra 3000 homes up to 2031 beyond local need to help address the shortfall in the wider HMA, however this will need to be considered in the light of the emerging evidence base in the GBHMA so the situation needs to be kept under review.

Question 5: Do you agree with the proposed approach to the Black Country Green Belt review?

Yes, as this picks up the higher tier work which is ongoing at the GBHMA level, however discussions will need to be ongoing under the Duty to Co-operate in relation to more localised work to ensure alignment and consistency where there are cross boundary implications: Cannock Chase Council published its own Green Belt assessment in 2016. Comments submitted under Question 1 are reiterated here in relation to the Call for Sites process.

Green Belt options should not only be considered in terms of their suitability (or not) for development but also whether they can play a role in being utilised more effectively in terms of a Green Infrastructure network which can serve a wide range of purposes (enhanced biodiversity, sport and recreation uses for example) which can enhance quality of life and potentially mitigate for the impacts of development on both a local and strategic scale. This should be explored further, in conjunction with partners across the HMA as work on the plan progresses.

Question 7: Do you think that the Core strategy vision and sustainability principles remain appropriate?

In principle, yes, however as set out in the response to Question 1 this will need to be kept under review in the light of the emerging evidence base. Whilst already covered via policy CSP3 of the 2011 strategy, the role of Green Infrastructure could be strengthened through the new plan, particularly (but not exclusively) in relation to the Green Belt as it can serve a wide range of purposes (enhanced biodiversity, sport and recreation uses for example) to enhance quality of life and potentially mitigate for the impacts of development on both a local and strategic scale.

Question 8: do you think that the Core Strategy spatial objectives remain appropriate?

In principle, yes, however as set out in the response to Question 1 this will need to be kept under review in the light of the emerging evidence base. Whilst already covered via policy CSP3 of the 2011 strategy, the role of Green Infrastructure could be strengthened through the new plan, particularly (but not exclusively) in relation to the Green Belt as it can serve a wide range of purposes (enhanced biodiversity, sport and recreation uses for example) to enhance quality of life and potentially mitigate for the impacts of development on both a local and strategic scale (potentially including that which may impact on the Cannock Chase SAC).

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?

In broad terms, yes although this will depend upon the detail of the emerging evidence (and see response to Question 1). Green Belt policy will need to be reconsidered however as new defensible and permanent boundaries may need to be set through this process.

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? What factors should be taken into account in an assessment of the opportunities in neighbouring authorities eg proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?

Firstly, there would need to be clear and justified evidence that the Black Country has explored every reasonable opportunity to deliver as much development as possible within its own boundaries so this will depend upon the evidence which is still underway. Secondly, any shortfall relating to the Black Country should be considered 'in the round' ie not just in terms of those areas which have a direct boundary with the Black Country but as a whole as per the evidence base which is currently being prepared across the GBHMA (which will also avoid the risk of any double counting).

Earlier questions have raised the matter of the Call for Sites potentially covering cross boundary options including sites in neighbouring districts and our response to questions 1 and 5 should therefore also be noted here.

Should export of growth be required, close working will be required to ensure sustainable development and alignment between the BCCS and neighbouring plans.

Question 19a / b – do you support Spatial Option E4? Should any factors be taken into account in an assessment of the opportunities?

Please see answer to question 15a.

Questions 26 / 27 and 28: Infrastructure

As the plan progresses, further discussions will be required on infrastructure issues depending on which sites / options are to be looked at further, as there may well be cross boundary implications which need to be addressed.

Questions 32 / 33: Health and Wellbeing

The role of sport and recreation could be strengthened (figure 10) as could the role of Green Infrastructure in providing for a range of needs.

Question 38: do you think that the current accessibility and density standards are appropriate for Green Belt release locations? If no, what standards should be applied in these locations and why?

As the adopted strategy does not allow for Green Belt release, presumably this means those standards set out in policy HOU2? Not all Green Belt sites will be the same as their context will vary on a case by case basis, and while the current policy allows for this to some extent further discussions will be needed in areas where there are cross boundary implications to ensure consistency between local plan approaches.

Question 49a: is there still a need for existing Policy DEL2 in order to manage the release of poorer quality employment land for housing?

Employment policy needs to be brought up to date to reflect the NPPF. Given the pressures on the need to find enough sites for housing poorer quality employment sites which are no longer fit for purpose should be considered for housing needs where appropriate and sustainable to reduce pressures elsewhere.

Question 50: Do you think that the Core Strategy should continue to set a target for the total employment land stock in policy EMP1? Do you think that distinguishing between Strategic high quality Employment Areas and Local Quality employment Areas is still appropriate?

The Core Strategy needs to reflect current national policy and guidance. As the plan (and evidence base) moves forward, delivering any net uplift (as per paragraph 6.58) will need to be explored further. As with housing, growth may well have strategic and cross boundary implications and further dialogue will be needed as the plan is developed.

Question 55: do you agree with the proposal to retain Policy EMP5?

Yes, it is important that the developers / owners of major new job-creating developments contribute to the recruitment and training of local people, which could also have cross boundary implications and benefits.

Question 56: Do you agree with the proposal to update Policy EMP6 in line with current priorities?

Yes. By promoting and enhancing the range of facilities within the Black Country it will provide visitors and residents with a range of activities which may reduce the pressures upon other, sensitive environments which are a draw for tourism, including the Cannock Chase SAC.

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 and local centres?

Yes - this approach is appropriate and consistent with the NPPF where supported by evidence and is designed to protect the vitality and viability of town centres which also has cross boundary implications.

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 – see answer to Question 74. This does not just relate to the vitality and viability of Black Country centres but also has implications beyond the Black Country.

Question 88: do you agree that the overall transport strategy supports all of the Core strategy spatial objectives? Together with questions 89 (proposed changes to the priorities for the transport network), 90 (changes relating to managing transport impacts of new developments), 91 (the efficient movement of freight), 92 (network for walking and cycling) and 93 (changes to Policy TRAN5 – travel and travel choices)

The transport implications of the plan will have far reaching consequences beyond the boundaries of the Black Country. Cannock Chase Council continues to engage proactively with a range of partnerships dealing with transport issues and will continue to do so as the detail of the plan progresses.

Re: 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.

Reference should be made to completion of the £100m, Walsall-Rugeley, Chase Line electrification/linespeed upgrade, which will lead to faster and more frequent services north of Walsall to the west Coast Main Line at Rugeley Trent Valley. The route will also provide an alternative diversionary route between Birmingham and Stafford for long distance passenger and freight services, when the Birmingham-Wolverhampton-Stafford, Stour Valley route, is closed for maintenance.

Reference should be made to the future ownership of the M6T and also the future role of the parallel A5T, which has a dual carriageway section through the Walsall MBC area at Brownhills.

Reference should be made to the Chase Line Station Alliance

- Network Rail and WMR is developing an innovative 'Stations Alliance', which, together with Abellio, the new West Midlands franchise operator, is hoped to bring about substantial improvements to West Midlands rail stations.
- The Alliance has created a WMR Stations Vision so that they are instantly recognisable in the areas which they serve and also integrate properly into the community.
- Stations should act as 'Gateways,' with quality infrastructure and more facilities such as shops.
- Network Rail are only funded to maintain stations to CP3 standards and 7-9 year franchises, do little to incentivize operators to invest in stations.

- Funded by Black Country and Stoke and Staffordshire LEPs and West Midlands Rail work is already underway to develop some indicative Master Plans for two trial routes – the Stour Valley Line from Birmingham to Wolverhampton (exclusive) and Chase Line stations north of Walsall.
- Options for funding the works will also be considered as part of a commission, which is due to be completed by Autumn 2017.
- GHD consultants have been appointed and site inspections of all stations carried out on with the consultant and local authorities, was in June.
- The study is in two stages:- Stage 1 is to confirm the projects for outline development. It is anticipated that this stage will result in a shortlist of projects for further development.
- Stage 2 will develop outline a master plan for each of the prioritised stations from Stage

WMCA Transport Delivery Committee endorsed this approach on 3 April 2017.

Re: 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.

R: Reference should be made to the proposed Mid Cannock road/rail interchange proposal by Pentalver. The facility would have the potential to be served by between 4 - 6 freight trains a day and serve the Black Country area.

Question 94: do you support the proposed changes relating to environmental infrastructure and place making?

Whilst already covered via policy CSP3 of the 2011 strategy, the role of Green Infrastructure could be strengthened through the new plan, particularly (but not exclusively) in relation to the Green Belt as it can serve a wide range of purposes (enhanced biodiversity, sport and recreation uses for example) to enhance quality of life and potentially mitigate for the impacts of development on both a local and strategic scale (potentially including that which may impact on the Cannock Chase SAC).

Question 96: Do you support the proposed changes relating to nature conservation?

The plan will need to ensure it takes into account any cross boundary implications as set out in the response to Question 2: the evidence base on Cannock Chase SAC is in the process of being updated and so the Black Country authorities will need to continue to engage (as they currently are doing) in this process via the Cannock Chase SAC partnership. This is covered under key issue 5 and also in paragraph 3.61 and potentially a policy may be needed to address SAC issues to align with the approach of other SAC Partnership authorities. The advice of Natural England will also be key to this issue.