

[Redacted]

From: [Redacted]
Sent: 01 September 2017 15:22
To: Blackcountrycorestra
Subject: South Worcestershire Councils' Consultation Response
Attachments: BC CS Review I&O Response.doc

Dear sir/madam,


Please find attached a consultation response to the Black Country Core Strategy Issues and Options Paper submitted on behalf of the south Worcestershire councils.

Kindest regards,

[Redacted]

Planning Policy Team Leader - Worcester City Council

@ [Redacted]
[Redacted]
[Redacted]

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1st September 2017

Black Country Core Strategy Issues and Options Consultation Response

Dear Sir / Madam,

Thank you for the opportunity to comment on the black Country Core Strategy Review Issues and Options. It should be noted that the comments below are officer comments which have been endorsed by the Portfolio holders at Wychavon and Malvern Hills District Councils and the Chair and Vice Chair of the Place and Economic Development Committee at Worcester City Council. This response is made in the context of the on-going Duty to Co-operate.

As background, Malvern Hills District Council, together with Worcester City Council and Wychavon District Council adopted the South Worcestershire Development Plan (SWDP) in February 2016.

Development Strategy

The South Worcestershire Councils are concerned that the issue of the considerable unmet housing need arising within Birmingham is not sufficiently resolved. Whilst the Black Country authorities recognise that this is a significant issue and have agreed to test capacity for an additional 3,000 dwellings, there is a significant shortfall remaining and therefore, should the on-going evidence base find that there is capacity over and above that currently being tested, consideration should be given to whether or not there is any potential to meet a greater element of the shortfall within the Black Country given its close proximity to Birmingham.

The south Worcestershire councils agree that the review should be a partial review which retains and stretches the existing spatial strategy and reviews the relevant policies.

The south Worcestershire councils agree that the evidence base listed is sufficient and is pleased to see consideration being given to the on-going work being undertaken to address the Birmingham shortfall. It is pleasing to see that the Green Belt review for the Black Country will sit within the context of the Strategic Growth Study and will be carried out in conjunction with South Staffordshire.

The key issues identified are considered to be appropriate issues for the plan to consider.

The first preference is for the Black Country to accommodate all of its need within its own administrative area. However, should exporting growth be necessary consideration should be given to the outcomes of the Strategic Growth Strategy and the growth should be accommodated within the Housing Market Area or within those authorities that have a strong

connection with the Housing Market Area. Additionally, access by public transport and the potential to enhance existing links as well as create new ones should be prioritised to encourage sustainable commuting patterns. Employment and housing should be located within easy access of each other.

Careful consideration should be given to the specific types of housing needed and where the evidence base justifies it a target for particular housing types should be included in order to ensure that all needs are being met. With regard to affordable housing, it is important to ensure that viability isn't undermined by increasing the target, to the extent that overall delivery falls, however, the use of a higher target supported by site by site viability appraisals at the development management would ensure that delivery of affordable housing is maximised. Where the viability evidence supports doing so, higher targets should be imposed on particular types of sites for example greenfield or green belt sites, however, where these sites are significant in scale the infrastructure demands may render this unviable.

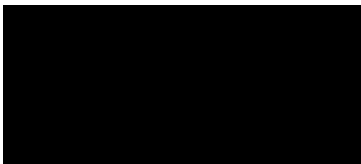
Brierley Hill Retail Pre-Conditions

With reference to paragraph 6.83 and question 68, the south Worcestershire councils would have concerns about the relaxation of the pre conditions for retail growth at Merry Hill. The introduction of parking charges would make the Merry Hill Centre comparable to other strategic centres within the Black Country and beyond, all of which have parking charges in place. Without this pre condition being met, the south Worcestershire councils would be concerned about the impact of retail growth at Merry Hill on the centres within south Worcestershire, particularly Droitwich and Worcester City.

In conclusion, notwithstanding the concerns relating to the unmet need arising from the conurbation, the south Worcestershire councils raise no objections to the plan at this stage and welcome the opportunity for further discussions with the Black Country authorities as the Core Strategy Review progresses in order to comply with on-going requirements associated with the Duty to Cooperate. Consequently the SWCs wish to continue to be consulted on subsequent stages of the Black Country Core Strategy review.

Please do not hesitate to contact me should you require any clarification with regard to this matter.

Yours faithfully



Planning Policy Manager Malvern Hills and Wychavon and Interim SWDP Project Manager