



31/8/2017

Dear Sir,

REF BLACK COUNTRY CORE STRATEGY

The Friends of Sheepwash Local Nature Reserve would like to respond to this consultation set out below. The friends group is one of the longest established in Sandwell going back to 1997. Sheepwash Local Nature Reserve, the only designated local nature reserve in Tipton has recorded around 190 bird species as well as having SSSI status sites and areas of locally rare important wildlife habitat such as wet meadow areas and wetland/reed habitat. Our primary objectives as per our constitution are the protection of the nature reserve and its surrounding wildlife corridors and also trying to combat the anti- social behaviour/vandalism that has plagued the site for many years. The Black Country Core strategy raises issues which are highly relevant to these two objectives and it also must be said that it directly threatens the future of this site.



THE CONSULTATION PROCESS AND THE FLAWED STRATEGY

Firstly we would like to state that we do not believe this consultation has been conducted in a very appropriate manner. The core strategy itself is far too broad and the oppressive 100 page document, and 130+ questions is unlikely to have been communicated in such a way that the majority of people will even have read or understood what it is about. The shortened online version is little more than a loaded confirmation bias tick box exercise whereby the BCCS can write

off a “democratic” consultation exercise to get what the constructors want- which is to build more houses on open space.

Quite simply we distrust the entire basis on which it is constructed, and its authors appear to be minded towards the ever unsustainable expansion of urban environments by usurping any land available no matter how contaminated it is or how it will adversely affect those who are already finding it difficult to live with the overpopulated density that planners believe is acceptable.

A reasonable question which we would like to ask the BCCS is, if people reject your plans for housing more unsustainable housing in their areas, given you are refusing to even ask “IF” they want more housing instead of “where” it should be, are you just going to ignore all the objections despite having no democratic basis to justify pressing ahead with it? To what extent are people already living in densely overpopulated areas like the Black Country compared with the rest of the UK even offered a choice in the BCCS vision?

Our open spaces are being systematically destroyed by the avarice of the “offshore” tax avoidance construction lobby and the political/business class who faithfully serve them and who themselves choose to remain and live in splendid rural isolation, yet dictate that we should have to live with more overspill from Cities like Birmingham to line their pockets still further- most notably by supplementing the private landlord and so called “affordable housing” industry.

Put simply, “the need” for housing in the Black Country is one which is founded on an odious lie about rising population. The population “rise” is down to manipulated Lego land building by politicians, simply to raise the council tax bands to accrue more money in order to cover their perennial mismanagement. It can also be used to plead “poverty” to national Government, and unfortunately the unwanted West Midlands Combined Authority-(again with no valid mandate), is a means of achieving this.

Taking Sandwell as an example, one can see that from official figures on its creation in 1974 that this area according to the official guide from that year:

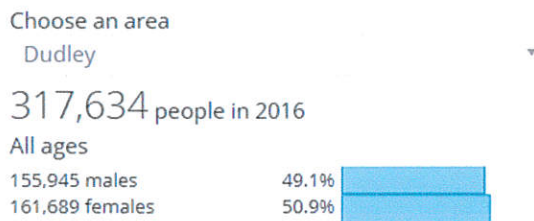
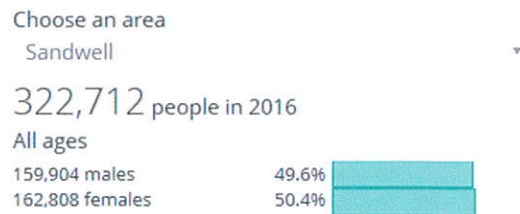
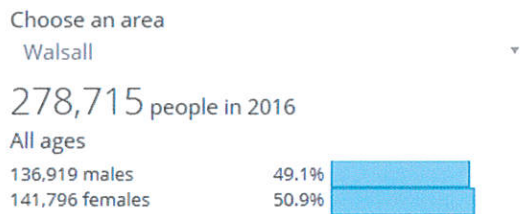
“With an estimated population of 324,000 and a total area of 21,150 acres, the borough is urban in character and highly industrialised and includes the districts of Oldbury, Rowley Regis, Smethwick, Tipton, Wednesbury and West Bromwich.”

A freedom of information request however revealed in 2014 that this figure had actually fallen to 316,700.

<https://www.whatdotheyknow.com/request/306299/response/777408/attach/html/3/FOI%20Response%201%20727066864.doc.html>

Having looked into the official statistics for the other black country boroughs, they also show this statistic of population falls with the 1980/90’s, yet only increasing with the disastrous managed Eastern European free movement in 2004- itself a politically managed and motivated cheap labour exercise. With Brexit hopefully now alleviating this influx, to what extent has the BCCS taken this into account, and why should it want to create what could become unoccupied new house ghost towns that no one lives in?

Every mention of this theme of “need” running throughout the document and “the strategy” is challengeable, yet the authors of this paper do not appear to want it to be. Below are the latest figures from the estimations of The office of national statistics.



As seen by these statistics, Sandwell’s population is the largest, yet as a borough it has 86 square kilometres (33 sq mi) according to the 2011 census. Wolverhampton by comparison has 26.8 square miles.

Old Code ONS Code	Statistical Unit	Unit of Measure	England & Wales	England	West Midlands	Walsall	Dudley	Sandwell	Wolverhampton	Black Country
			K04000001	E92000001	E12000005	E08000030	E08000027	E08000028	E08000031	n/a
Usually Resident Population 2011	Persons	Number	56075912	53012456	5601847	269323	312925	308063	249470	1139781
Usually Resident Population 2001	Persons	Number	52041916	49138831	5267308	253499	305155	282904	236582	1078140
Popn Change 2001-2011	Persons	Proportion	0.071938	0.07307	0.059719	0.058755	0.02483	0.081668	0.051662	0.054081
Males	Persons	Number	27573376	26069148	2763187	132319	153819	151592	123441	561171
Females	Persons	Number	28502536	26943308	2838660	137004	159106	156471	126029	578610
Area	Hectares	Number	15101354	13027843	1299832	10395.49	9795.66	8556.73	6943.95	35691.83
Density	Persons per ha	Number	3.713304	4.069166	4.309671	25.90768	31.94527	36.00242	35.92624	31.93395

One can see that this population density in Sandwell is grossly disproportionate to England and Wales- as are the other Black country boroughs, yet how is it that we are expected to take more, or that there should even be “a call for sites”? Just what madness is the BCCS trying to create?

THERE IS QUITE SIMPLY NO ROOM LEFT! At what point are planners going to accept this because currently it does not appear that they have set any maximum levels, except coming back every

few years and wanting more and more land for unsustainable housing supply when the “demand” has been artificially created.

Sheepwash and increasing population density

We have witnessed how increasing population density around the site has contributed to an increase in anti-social behaviour as well as the disjointed disintegration of community by influx of non- English speakers. Essentially foreign ghettos have been created where large social housing developments for rent have destroyed the character of towns. With a fall of police, no school places, full doctors surgeries, over- subscribed school places, where is the “sustainability”?

The nature reserve itself is directly threatened as a concept by an increase in human population around its centre. In particular reference to this was the ludicrous decision to centre a regeneration corridor for housing RC9, to which we continue to fundamentally object.

THE BCCS QUESTIONS

We do not wish to answer all of the BCCS questions but the ones that are most relevant to protecting sheepwash from further threat of housing.

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?

No we do not.

“There have been a number of changes to national policy and a housing shortfall has been identified in Birmingham which neighbouring authorities have a duty to consider accommodating.”

For reasons stated above concerning population density, it is a disgrace that the BCCS tries to sneak this through without a full review. Why should neighbouring authorities have “a duty” to accommodate Birmingham’s overspill? By “stretching” the existing special strategy you mean more land grabbing for housing so why hide behind such concealed scheming?

We are sick and tired of having to be “developed” in the urban area.

“Given the levels of growth to be planned for, care is needed to safeguard environmental and historic assets and to ensure enough services, such as open space, shops, schools and healthcare, are provided.”

This statement in relation to Sandwell, and specifically corridor RC9 cannot be delivered.

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.

No. Each individual site should be looked at for constraints. Land contamination issues for specific sites in the 2011 core strategy were not looked at seriously. In particular the recently published Sandwell council Dudley Port supplementary planning document dealing with housing allocation sites in the RC9 corridor show that none of the proposed sites have been developed and still have considerable contamination issues associated with them. Five years on, and some of the sites have remained in exactly the same condition- ie non-deliverable. For how long should these sites remain as paper target figure exercises before being realised that they are never going to be deliverable? In particular the former Duport's tip site in Tividale was supposedly "reclaimed" but was not in terms of housing suitability in the 1990's under the auspices of the black country development corporation, but retains considerable development constraints. No local residents that we have spoken to want the area developed for housing at all, yet it remains on the plan against all local opposition- why?

We would also like to add that a large petition was handed into Sandwell council against this housing allocation site in the consultation for the DPSPD. We want to see this site removed from the allocation process as not deliverable and also not wanted.

We also note at this stage from the Health and Wellbeing Technical Paper

"Local communities through local and neighbourhood plans should be able to identify special protection for green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period (para. 76.)"

**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.**

No we do not. We could not care less about "national guidance" as these theories do not live in our area, and neither do planning inspectors from Bristol. You frame these questions in such a way as to supply what you are going to do then ask people to challenge it based on "national guidance". Where is there any evidence of compiling a strategy based on what local people want, instead of what national guidance demands? The housing allocations are not appropriate because they are unsustainable.

Our futures under increasing density appear in your context to be linked to the housing business market, supplying money to greedy developers. The strategy should not be based on HMA's and certainly not accommodating Birmingham overspill. Is this core strategy called "the Birmingham core strategy"?

With question four we simply ask, if more employment land is also sort in this exercise after you basically did not correctly apply it in 2011, why do you not just accommodate this into the existing brownfield sites instead of trying to clean up contaminated sites of past industrial use for housing and then grabbing land for employment from the greenbelt. The BCCS appears to want to increase

the population to unsustainable levels and then try to fit in employment as an afterthought. You cannot do this, the area is full and there are few jobs already.

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?

Who are The Greater Birmingham and Black Country Housing Market Area (HMA) authorities and to whom are they accountable or answerable? Who elected them? We do not support building on green belt land to accommodate former Industrial land house building to line the pockets of the house building industry. Existing vacant Industrial land should be used to house new industry and support existing population job growth.

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?

Officers compiling this plan and particularly councillors approving it need to look at the social breakdown of communities and the threat to mental health that population density and also lack of jobs is creating. The more you increase the population the less chance of a job. All of strategy appears to be centred around “the economy” and not about local peoples’ needs or aspirations. There is a strong sense that decisions are being promoted by people who do not live in the black country, by choice, and a blank cheque is being given to promote these schemes all based on theoretical numbers. There are few practical or realistic measures in this review just more theory, more acronyms, more figures.

You should look first at existing school places, existing doctors surgeries etc BEFORE adding more people and then as an afterthought deciding that more of these are then needed.

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

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?

As previously stated, area RC9 is not deliverable. It has not been deliverable for over 30 years before the 2011 BCCS. It is proposed to build new houses on contaminated land putting existing residents at risk who do not want their quality of life ruined for the purposes of meeting targets. Their view should be a valid vision.

More open space/wildlife areas are needed in the brownfield area. These are being lost and so called “mitigation” isn’t being met where wildlife is concerned.

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?

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?

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.

We totally reject all your proposals. We do not support building houses on employment land. We do not support building houses in regeneration corridor nine as it is unsustainable to live there with little employment land there already for those who are out of work living there. You appear here to be suggesting putting small existing businesses out of business on the say so of any individual who wants to build houses there instead. This whole process is open to wide scale fraud with multiple agents of the house building industry submitting "call for sites" in areas where they can make a killing. What democratic mandate does the BCCS have for doing this? It is deplorable.

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.

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).

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.

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

No we do not support either. When you talk of "rounding off" the green belt this means grabbing land and putting a spin on it. Look at the black country borough density we have given evidence on and compare this with the green belt in areas like Warwickshire/Worcestershire/Shropshire and Staffordshire. These areas should give up their green belt land first. The green belt area , or

what you can even call such in the Black country cannot be given over to satisfying Birmingham's "poverty" pitch. To question 15 we would refer to this "export" as you term it. The black country is full.

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).

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).

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).

Question 19a – Do you support Spatial Option E4? Yes/No

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)

If you think there are any potential locations that should be considered, please provide details.

Question 20 - Do you think there are any other deliverable and sustainable Employment Land Spatial Options? Yes/No

If yes, please provide details.

E1, E2, E3 NO STRONGLY OPPOSED. E4 yes. It has long been established that people can commute FROM areas such as Kinver or Malvern into the black country, yet never in the opposite direction. Why?

Q20 The Vaughn trading estate in Tipton is one such site, and we are keen to see The Autobase industrial estate on the border of Sheepwash retained for industrial use. NB WE OPPOSE ANY THREAT OF THIS SITE EVER BECOMING CONSIDERED FOR HOUSING.

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.

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.

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.

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.

We do not support creating more housing capacity, as already stated in our area because it has reached an unsustainable level already. We have had many dealings with West Midlands police and also Sandwell council's anti-social behaviour teams. Pressure from new developments in the Tividale area and Great Bridge has resulted in more anti-social behaviour issues- particularly riding of off road bikes and illegal fishing on the nature reserve. This leads to the value of the site as "a nature reserve" and also a SSSI site being devalued.

We are aware of school places in the area being challenged, and in the Temple Way area (part of RC9 corridor), there are no shops, poor parking and a lack of any community centre. Another 250 houses in this area on the site of the former Duport's Tip will do nothing but over tip this unsustainable situation even further.

We are afraid that there is a major disconnect in reality from people who do not live in our area, and who are producing the BCCS and our personal and practical every day experiences. There is little engagement other than this oppressive generalised strategy for allowing people to express their opinions. There is a lack of planning involving local people, and the impression that they do not have any control or say in how their areas will develop or remain.

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.

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.

"Poor ground conditions, a legacy of the Black Country's mining and industrial past, affect much of the area. As ground conditions are a major constraint on delivery, land remediation is a priority for delivery intervention. It is recognised that in dealing with individual development proposals, exceptional circumstances may occasionally arise which result in genuine financial viability concerns, for example where remediation costs are above what could reasonably have been

foreseen. The Black Country has a good track record of working with developers to address viability issues and deliver sites.”

Corridor RC9 is the epitome of this. The Black country development corporation failed. The Duport’s tip site has on its doorstep the contaminated rattlechain lagoon, a chemical waste dump and threat with a still current waste management licence. It is unthinkable to build more housing in such a location- here is a direct quote from social media about someone who was conned, and we use that word because it is true when they bought a house built on the former sewage works next to this lagoon, which by stupidity of a Bristol planning inspector gained approval.



I bought a house on the banks of this chemical dump. It took me 18 months to sell it (at a massive loss which I'm still paying for now). So glad I'm away from this now. Many nights sleep lost worrying about the health of my kids growing up with this in our back garden. We had meetings with the Environmental Health and Rhodia and were even interviewed by the press. Nothing ever came of it. Strangest of all, none of this showed up on any searches when we purchased the property from Barratts and the hazardous waste signs disappeared from the gates while the properties were being sold.

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NOW THAT’S GREAT STRATEGIC THEORETICAL PLANNING FOR YOU ISN’T IT. It is also a reminder that planners need to live in the real world and realise that people have to live in these areas for many, many years and building in such locations can have significant health consequences.

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?

No, you are not living in the real world. Many sites like the ones mentioned already are not deliverable, have not been deliverable in the last five years, have not had anything done to them in the last five years and are not economically viable. Why then are such sites retained when the prospect of them ever becoming a reality (which local people do not want anyway)?

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

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?

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

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?

This is fundamental, but you don’t appear to realise that putting pressure on people, reducing their areas of open space, nature reserves and access to nature are a direct threat to their existing health and wellbeing.

- YOU MUST LOOK AT THE IMPACT OF HOUSING DENSITY AND HOW THIS PROMOTES MENTAL ILL HEALTH AND ANTI-SOCIAL BEHAVIOUR
- YOU MUST LOOK AT HOW CREATING FOREIGN GHETTOS, (OF LARGELY NON FIRST LANGUAGE ENGLISH SPEAKING IMMIGRANTS), IS DESTROYING A SENSE OF EXISTING COMMUNITY
- YOU MUST LOOK AT HOW HOUSING YOUNG AND OLD TOGETHER, AND MIDDLE CLASS WITH LOWER CLASS ECONOMIC UNDERCLASSES IS DESTROYING COMMUNITY.
- SOCIAL PRIVATE RENT HOUSING BOLTED ONTO NEW DEVELOPMENTS IS DESTROYING COMMUNITY.
- THE TIME OF SOCIAL AND MULTICULTURAL EXPERIMENTS, WHICH HAVE NEVER WORKED ANYWHERE IN THE URBAN REALM MUST CEASE.

More housing=fewer opportunities, jobs, school places, doctor's appointments, queues in shops. It also promotes car fumes, social inequality, power cuts etc

Worse still is the health and wellbeing aspect of building sites on contaminated land. There are few studies at present which show the long term impact of 50 years of living on such a site. The new build on brownfield land first approach is a potential cancer keg which will hit the NHS if it still exists. Ill conceived developments such as The Stonegate housing estate in Walsall is a good example of such a mistake in that people who live in this area are unsure as well as the local authority as to how this direct health threat will be dealt with. The core strategy does not address this issue and neither does the unfit for purpose NPPF. Indeed the NPPF is a Nostradamus like nonsense with directly conflicting statements like the quatrains of the great "prophet" , which can be used by anyone who wants to cherry pick to suit their particular argument. It is also written by civil servants who do not live in areas like the black country, and will never do so by choice- for the purposes of their own "health and wellbeing".

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

No for the reasons stated above.

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..

Question 95a - Do you think Garden City principles should be applied in the Black Country? Yes/No
If yes, how should they be applied?
Question 95b - Should the application of Garden City principles be different for brownfield and greenfield sites? Yes/No
If yes, please explain why.

We are totally opposed to so called "garden city" principles as these are a spin on land grabbing and building on areas of nature conservation and open space and reducing it. We submitted an objection to Sandwell council regarding the Dudley Port supplementary planning document citing that though the document spoke of "Dudley port" the area affected by the largely economically non- viable housing areas (RC9) is located in Tividale. A petition signed by over 400 local residents

and users of Sheepwash nature reserve was also submitted at the same time. If this is white washed it makes a mockery of this whole exercise, as it is not what local people want, but people who believe they are somehow better than those people and who do not live in their area who are making life changing decisions for their areas. "The garden city" is a direct threat to nature.

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?

We do not believe the NPPF cares about this issue, but policy env1 does address the concerns we have about development around sheepwash and how corridor RC9 is in conflict with this.

Question 102a - Do you support the proposed changes relating to open space, sport and recreation? Yes/No

If no, please explain

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

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.

You have not set out what these "proposed changes" are to policy ENV6 ! This needs immediate clarification. We do not believe the caveat of the current policy ENV6 "making creative use of land exchanges and disposing of surplus assets to generate resources for investment" protects open space but just leaves it open to being targeted. We also do not believe that this policy should be used to undervalue nature conservation sites like sheepwash- eg by inserting a play area into the site which is not wanted. This policy has potential to undermine any existing nature reserve sites, and so we would like clarification on what the changes are.

We believe that nature reserve sites should have special mention in this policy so that they are not targeted for land swap use- i.e a football pitch is built on for housing, so a new football pitch is created on part of the nature reserve. The net loss is to the nature "reserve" but this policy does not adequately clarify if there is a hierarchy of sites. We are of course of the opinion that nature reserves should come before sports provision.

Question 115a - Do you have evidence of any realistic possibility of fracking in the Black Country? Yes/No

If yes, please provide details.

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.

We do not support fracking under any circumstances. The legacy of past industrial use and soil contamination make this concept a non- starter in terms of water/river contamination.

Question 117 - Do you agree with the proposed approach to updating and amending Appendix 2 of the existing Core Strategy and Tables 2 and 3 of this document? Yes/No
If not, what alternative approach would you suggest?

No we do not. These plans will always be opposed locally in terms of corridor RC9 and the development next to rattlechain lagoon and the former Duport's tip. There is very weak detail

provided in local plans like the Dudley port supplementary planning document about this area. Take for example the swot analysis, which Sandwell council did not even publish with the document, but was obtained through an FOI request.

SWOT Analysis

Analysis of the Dudley Port area provides important information regarding the strengths, weaknesses, opportunities and threats, and provides a good insight into how an area works, what works well, and what does not work so well.

Field analysis of the Dudley Port Priority Area identified the following information:

Strengths

- Canal network
- Green spaces (scale of the Sheepwash Urban Park)
- Overall sustainability of the location with a choice of means of transport to local facilities without using the car.
- Linkages
- Train service to Birmingham from Dudley Port (15mins) and Sandwell and Dudley (10mins)
- Integration of bus and train stations
- Direct train service to London (1hr30mins)
- Good public rights of way
- A direct off-road cycle route into Birmingham City Centre (7 miles)
- Old Stourbridge freight line for light rail/freight (Stourbridge, Merry Hill, Dudley, Dudley Port, Wednesbury and Walsall)
- Light Rail/Train/Bus/Cycle interchange at Dudley Port Rail Station
- Situated between two town centres Oldbury & Great Bridge

Weaknesses

- Connectivity
- Isolation/vulnerability on canal/LNR
- Lack of activity and overlooking
- Safety concerns
- Quality of towpath & green space surfaces
- Lack of legibility/signage & lack of interpretation boards-difficult to make vandal proof
- Poor bicycle connectivity from NCN81 to Dudley Port Station & lack of parking provision
- Anti-social behaviour/litter/graffiti/damage
- Railway line/canal forms a barrier between the north and south of the intervention area
- Multiple land ownership of potential development sites
- A lack of focal points
- Poor quality cycle route along Dudley Port
- A461 Dudley Port congestion & at capacity local rail service at peak times
- Great Bridge has poor quality facades, which need a facelift

Opportunities

- Promote and enhance the canal network
- Promote and enhance local nature reserve
- Dudley Road children's play area/walking bus meeting point
- Creating a traffic free walking & cycling network (improving on highway facilities)
- New developments
- Overcoming barriers/improving links
- New housing development
- New employment development
- Environmental / energy efficient minded
- Funding streams CIL, LEP, European Funding, Integrated Transport Budget, Public Health
- Upgrade John's Lane & Rose Lane Tunnels to improve connectivity between north and south of the intervention area

- Develop a showcase site to create interest amongst developers
- A tree lined boulevard along Dudley Port
- Solar powered bus stops/or with green roofs
- Improving integration between No74 bus route & Dudley Port Station (moving bus stops)
- Creating a safe place to live through design e.g. overlooked towpaths and green spaces
- Uplifting Dudley Port to attract investment
- Extend Dudley Port Platform to allow an extra train carriage to increase capacity
- A residential fringe could be developed to increase overlooking of the greenspace and increase usage and overlooking to increase safety
- Thin out trees to increase sightlines over the Park
- Could heat pumps be used in any of the former mineshafts?
- EU Structural funds
- To provide a 'hub' type office space with video links etc to reinforce home working/provide associated facilities- this was seen as building on the already good sustainability features of the location.
- Netherton Canal Tunnel- an underused heritage asset- possibility of putting in lighting to replace original defunct gas lighting- increased pedestrian use would reinforce viability of Canal Trust visitor centre building at Warrens Hall nature reserve, and be the counterpoint to proposed canal-side café at Tividale entrance. This could utilise the turbine (repaired with Heritage lottery fund?) to generate power for low power LED lights in the tunnel
- Possibility of using coppicing on Sheepwash to generate an income. Trees can be grown as a crop, this would avoid any potential contamination issues growing food.

SWOT Analysis

Threats

- Inappropriate development
- Contaminated land/remediation costs
- Lack of interest/investment in investing in Dudley Port
- Weak/recovering housing market making developers more cautious
- Lack of gap funding to remediate Limestone mine housing allocation at Coneygre

We have added these to illustrate the point of locating additional housing next to a hazardous waste site. We can see here that the detail is poor from the DPSPD about land remediation costs and the “inappropriate development”.

Why would you possibly want to limit information for potential house buyers/investors? As far as we are concerned this sets the BCCS for what it is- a con job manufactured by the political class and their business chums and taking local people for every penny and leaving them with nothing except fractured communities built on contaminated land. In achieving this cruel vision it will no doubt supplement the income of people who register companies for tax avoidance purposes in places like the channel islands and who will profit from such land sales.

As stated previously we totally reject all your proposals in table 2. We do not support building houses on employment land. We do not support building houses in regeneration corridor nine as it is unsustainable to live there with little employment land there already for those who are out of work living there. You appear here to be suggesting putting small existing businesses out of business on the say so of any individual who wants to build houses there instead. This whole process is open to wide scale fraud with multiple agents of the house building industry submitting "call for sites" in areas where they can make a killing. What democratic mandate does the BCCS have for doing this? It is deplorable.

We reject "garden city" principles for the academia con job that they are.

The first and only test for those producing this plan, supporting it and passing it is thus- would you live in regeneration corridor nine next to a toxic waste lagoon containing many tonnes of white phosphorus that poisoned birds that landed on it?

The leader of Sandwell council does not even live in Sandwell, the black country, or the West Midlands, but Derbyshire.

How many of the black country local enterprise partnership live in the black country?

The same question for Andy Street?



I bought a house on the banks of this chemical dump. It took me 18 months to sell it (at a massive loss which I'm still paying for now). So glad I'm away from this now. Many nights sleep lost worrying about the health of my kids growing up with this in our back garden. We had meetings with the Environmental Health and Rhodia and were even interviewed by the press. Nothing ever came of it. Strangest of all, none of this showed up on any searches when we purchased the property from Barratts and the hazardous waste signs disappeared from the gates while the properties were being sold.

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This is the reality, not the flowery padded out garbage in this document which is just theoretical academic metropolitan elites telling the plebs how they should all live. The document is underhand and has been devised and serves underhand corrupt people and business interests.

**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.**

Yes- Retaining employment land for employment use and not promoting existing land for housing, and then grabbing areas of green belt/open space to compensate.

A strategy where the views of local people are engaged in the decision making process and not chaired by political front groups who do not involve the local community. One such example in our

area is the so called "Tipton Development group" - chaired (who knows by what mandate), by a former disgraced labour councillor.

No one appears to know anything about this group or its "plan" . There is no public record of who they are.

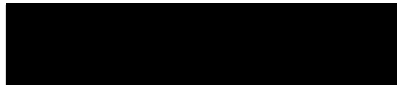
Quite unbelievably, there is no mention of Brexit in the entire core strategy document and how this will impact the whole "vision" of needing more housing or if it will even be needed at all. As this will hopefully reduce migration from Eastern Europe, (and there is current evidence of many returning there), the population projections are likely to be entirely inaccurate, and so what does the BCCS intend to do if there is a population decrease yet still plough on with building homes that will be empty?

Business is also of course another issue, and surely we need to retain land in existing areas rather than trying to build more elsewhere. Money to remediate areas of contamination may not appear from the EU, so what are your contingencies at that point up to 2036?

Virtually all of the policies in this document may be flawed or superseded by new legislation beyond 2019 and our thankful EU exit.

We would wish to be consulted on all aspects of this core strategy in the future, so please keep us informed.

Yours Faithfully

A solid black rectangular box redacting the signature of Ian Carroll.

Ian Carroll Secretary The Friends of Sheepwash local Nature Reserve.