

[REDACTED]

From: [REDACTED]
Sent: 19 September 2017 19:40
To: Blackcountrycorestra
Cc: [REDACTED]
Subject: Black Country Core Strategy: Comments from CBA West Midlands
Attachments: Black Country Core Strategy Proposals CBAWM proposals.docx

Comments attached. Apologies they are a little late but I hope that you can include them.

Thank you,

[REDACTED]

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Black Country Core Strategy Proposals

Comments from the Council for British Archaeology: West Midlands Branch

Key Issue 1: Updating the Evidence Base

Table 1 Evidence Base and Question 2 regarding further evidence required

There is mention of the Natural Environment but no mention of the Historic Environment/Heritage Assets

The importance of the Black Country local authority Historic Environment Records and the Black Country Historic Landscape Characterisation should be highlighted and the need for a historic environment assessment to inform the Preferred Spatial Options Report and to bring the proposals for the historic environment in line with those for the natural environment

Key Issue 5 claims to be about 'Protecting and enhancing the environment' but is in fact only about protecting and enhancing the natural environment! The recommendations contained in Section 12 ('Conserving and enhancing the historic environment') of the National Planning Policy Framework need to be taken on board, particularly the need for a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (Section 126) and, again, the requirement for historic environment assessments to enable heritage assets to be taken into account in assessing proposals for development (Sections 128-9).

Key Issue 6 – Reviewing the role and extent of the green belt

Again, the need for the identification, protection and enhancement of the historic environment in the green belt should be emphasised. In particular there are likely to be pre-industrial buried archaeological sites within the green belt areas.

██████████, on behalf of CBA West Midlands