

[REDACTED]

From: [REDACTED]
Sent: 05 September 2017 10:03
To: Blackcountrycorestra
Subject: Black Country Core Strategy Response
Attachments: BCCS from CPRE 17-5Sep.docx; BC housing and employment options CPRE.pdf; BC options response final CPRE.pdf

The attached are CPRE's response to the Black Country Core Strategy

[REDACTED]
Acting Chairman, CPRE West Midlands

[REDACTED]



West Midlands Region

From the Acting Chairman:

[Redacted signature block]

Black Country Core Strategy
(by e-mail)
blackcountrycorestrategy@dudley.gov.uk

5 September 2017

Dear Sirs,

This is a covering letter for CPRE's response to the Black Country Core Strategy. This consists of two documents:

- A response to the various questions ('Options response').
- A detailed report by [Redacted] on demographic issues ('Housing and Employment Options').

CPRE is a campaigning charity, which is a coalition of a national charity and branches in most counties, which are mostly independent charities. CPRE West Midlands is a regional group of the national charity, whose scope is the West Midlands region.

Our regional chairmanship is technically vacant. As an interim measure, we have agreed a rotating chairmanship, which I currently hold. You may however like also to note the e-mail address of our regional secretary, [Redacted]

Yours Faithfully,

[Redacted signature]

The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

The Campaign to Protect Rural England is a registered charity and a company limited by guarantee.



Black Country Core Strategy Issues and Options

Response for WM CPRE

Sept 2017

Introduction

1. The West Midlands Regional Group of the Campaign to Protect Rural England (CPRE) welcomes this opportunity to respond to the consultation on the Black Country Core Strategy Review and commend the professional nature of the work done by Officers so far.
2. As a charity with about 60,000 members, a branch in every county, over 200 district groups and more than 2,000 parish council members we work locally and nationally to protect, shape and enhance a beautiful, thriving countryside for everyone to value and enjoy.
3. This response was developed with the Staffordshire and Worcestershire Branches of CPRE, who are responsible for monitoring planning in the Black Country.
4. In developing our response we commissioned an independent consultant, [REDACTED] to review the economic and housing evidence base and his report is attached.
5. We note that he has concluded that more clarity is needed on the benefits or otherwise of releasing employment land for housing to reach a firm conclusion and we suggest this is work the authorities may want to progress as they move towards a preferred option.
6. We do have some concerns about the wording of the on-line questionnaire, particularly the first two questions. In effect they ask respondents where extra housing and employment land should go as if the quantity of land required was fixed. This is not the case and, to avoid bias, respondents should have been asked whether they agreed with the assumptions about housing and employment need. We hope that this will be addressed in future consultations.

Overarching Comments

7. CPRE is in favour of a continuation of the centres and corridors approach and the on-going stress on urban regeneration. This, however, has been put under threat by the assumed housing and employment land need.

8. As set out in the attached report we believe there is additional capacity which reduces (or removes) the need for Green Belt housing. We also believe that the level of employment land needed is not as high. There may be some need for larger employment sites, but this needs to take account of land available in adjacent authorities, including (as it stands) all of Four Ashes.

9. In principle we support industrial land which is no longer suitable being used for housing, but this is a complex issue which requires further analysis.

10. We believe it will be as important what type of housing is provided and there needs to be adequate affordable and social housing. In particular there is a need to address directly both accommodation for the elderly, whose numbers will dramatically increase, and housing for young people who are struggling to enter the market.

11. We are concerned that a review of Green Belt appears to be being driven solely by numbers, rather than by policy considerations and that allocations in the Green Belt could undermine urban regeneration.

12. We are in favour of strong policies to support centres, but these need to be framed within a changing environment where some centres may need to shrink or diversify to meet future needs.

13. We want to see a dramatic improvement in public transport provision which supports the regeneration of the Black Country.

14. We also believe more consideration should be given to air pollution, both from transport and other sources. The issue with diesel cars has increased the awareness of this and yet it appears to be only obliquely addressed in the strategy.

15. Lastly, the strategy needs to continue the strong emphasis on environmental improvement, including developing the Garden City idea, and it needs to acknowledge the value of the countryside within the Black Country's boundaries.

Responses to Individual Questions

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?

Yes, we agree that a partial review is appropriate. However, we are concerned that some elements are being dealt with out of context with the wider conurbation. In particular, while accepting there may be a need for some larger high quality employment sites across the Combined Authority Area, the basis for this would be wider than the Black Country. Sites such as Peddimore are already going ahead, and we do not believe it would be helpful to over-allocate competing large sites, which would lead to loss of Green Belt and might not be fully occupied.

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.

Yes, the evidence does provide a basis for the review. However, we do not fully agree with the conclusions drawn on housing and employment land as set out in the attached report. This impacts on our response to later questions. We cannot comment on the Green Belt review as it stands since we do not have details as yet.

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, as is set out in the attached report. In particular we are concerned in supply terms about the double counting of homes resulting from the market uplift identified in South Staffordshire, the questionable need to provide for under-provision from 2011 to 2014, especially as there was over provision in 2015 and no adverse market signals in those years except in South Staffordshire where there was over-provision. Furthermore the Oxford Economic Analysis which, unlike SNPP, allows population migration based on relative economic success, suggests that, even under the most fortuitous circumstances, that is to say delivery of the SuperSEP, some 6,000 households will migrate out of the conurbation beyond those accounted for in the SNPP figures. Since Oxford's Economic Analysis is being widely relied on, this hypothesis should be further tested.

There is a further problem with the trend analysis because it relies on Unattributed Population Growth which SNPP does not. Further analysis should be done discounting UPC, which

results from a variety of causes but may not be indicative of the future to reach a reasonable view on likely housing need.

This is particularly important because, while the majority of household growth comes from aging households, about a third comes from migration. We cannot be sure international migration rates will stay as high in a post-Brexit world while out migration to other parts of the UK may continue unabated.

In terms of the supply we cannot identify reasons to disagree with the position taken except in relation to large windfalls and current industrial land. It is clear that many current industrial sites, if they became vacant, would not be considered suitable for industrial use and become housing sites. In other words there is a large pool of potential windfall sites. The assessment of existing industrial land potentially suitable for housing seems to vary across the four boroughs but is clearly very substantial. In other words, even if the policy to release industrial land to housing is not taken forwards, sites will come forward. That being the case the local authorities should, in our view, be less cautious in their approach to large windfalls and assume a continuation at current rates.

Without including additional industrial land these factors could still add up to some 12,500 more homes available than is being suggested and substantially reduce the supposed deficit.

It also is important to understand these factors, because put together all these elements could mean the proportion of elderly people in the population was higher than currently envisaged making the type of housing created even more important.

Question 4 - Do you consider the employment land requirement identified for the Black Country up to 2036 in the EDNA is 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 don't. There is a broad range of figures for future employment need. Much of what is needed for smaller sites can be found based on the available employment land, even assuming the current trend continues. In terms of larger sites the EDNA identifies a need for larger sites, with none currently available over 20 hectares, (although the extension to i54 in South Staffordshire would fulfil that requirement.) To meet SuperSEP requirements it suggests there is a need for roughly 300 hectares of land not currently identified, the majority for logistics. It then discounts 170 hectares of land out of 270 has total at the Four Ashes site for no obvious reasons since it is clearly within the area and would serve the Black Country. This might leave 130 hectares but even that has to be seen in the light of the SuperSEP as a wider strategy, which includes large sites such as Peddimore in Birmingham.

In our view there may be a need for a very limited release of sites over 20 hectares across the SuperSEP area and these are unlikely to be found in the conurbation but, the result of

releasing very large amounts of Green Belt land in the Black Country and competing with Four Ashes, Peddimore and other existing business parks and logistics sites, (both in the West and East Midlands,) is likely to be both oversupply and underused sites, which would severely harm the countryside and encourage unsustainable patterns of travel.

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?

No. The approach to the Green Belt review is consistently wrong. It is identified as being solely to identify enough land to meet the housing and employment figures in the SHMA and EDNA. But this does not justify exceptional circumstances.

The NPPG guidance is clear:

However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

In other words, even if both the OAN is correct and the housing supply figure is correct, which we question (see answer to Question 2), the Green Belt review should not simply identify land to meet that need, it should seek to establish whether the level of land provision should be lower than the OAN because of the constraint of Green Belt.

In other words, Exceptional Circumstances should only be established if there are strategic justifications for the releases.

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?

We agree with most of them. We do not agree with the assumed figure for housing or that it is 'inevitable' that Green Belt will have to be released. That is a policy choice which needs to be assessed taking account of the high level of proof for 'exceptional' Green Belt release.

The key issues do not address the social impacts of the Core Strategy adequately and in particular fail to place sufficient emphasis on the housing needs of an aging population, which is clearly evident in the demographic evidence.

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

Yes, we supported the principles of the Black Country Core Strategy. In particular we supported the emphasis on urban regeneration and the importance of environmental improvement and enhanced public transport provision to deliver an area people wanted to live in. We also supported the principle of Corridors and Centres. There is a serious risk in our view that the approach to housing and employment land, driven by theoretical numbers rather than strategy, will undermine this approach and rather than lead to improved delivery will export housing and employment into the Green Belt, encouraging unsustainable patterns of development.

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? Yes/No; If not, what changes do you think should be made to Policies CSP1 and CSP2 in response to new challenges and opportunities?

Yes, they should be retained and updated. Their aspirations need to guide the approach to current needs. They should not be diluted.

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?

We do not have any examples to give.

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?

Even if we accepted the figures we do not believe the evidence is good enough yet to make a fully informed choice. Further work needs to be done in the development of the Preferred Option to identify consistently how much employment land might be available across the boroughs and how likely it would be to remain in employment use. This work needs to come to conclusions as to the relative benefit of either use, so that a realistic figure of land that would be better in housing use can be produced. One important element in achieving this will be to ensure there are up to date registers of brownfield land for all the authorities.

Prior to that we favour an approach somewhere in the middle, albeit we do not believe the need for Green Belt release is likely to be as high as is being claimed.

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 have no sites we can comment on.

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.

We do not have a categorical view on either option, although it is important that both are considered on their merits and it may be the choice varies from location to location. While some small sites at the edge of the conurbation may have less impact on the aims of Green Belt, they can represent important community assets, they may have wildlife value and they may act as important Green wedges into the city. On the other hand SUEs can be highly intrusive and may not be close to existing transport networks. We would, therefore, suggest both are considered as options, should such land be needed, and that the criteria for sites should have strong ecological and transport elements as well as addressing the purposes of Green Belt.

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).

We have no sites to offer.

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.

See answer to Question 12a.

Question 13b - What infrastructure do you think would be needed for different sizes of SUEs?

Clearly it depends on size but access to services would be critical, as well as access to transport. Larger SUEs may be more at risk of poor connectivity so that would need to be addressed both in location and in terms of ensuring the internal design supported sustainable transport.

Question 13c - Are there any potential locations that should be considered for SUEs (please submit through the 'call for sites' form) and what infrastructure would be required to support these?

We have no sites to offer.

Question 13d - Do you think that the Core Strategy should set out detailed guidance for the development of SUEs (e.g. type and tenure of housing, specific infrastructure required), rather than details being determined at a local level in light of local policies? Yes/No; Any further comments?

Yes, if SUEs are developed there should be policy guidance in terms of tenure and infrastructure. In particular there should be identified provision for older households and their needs should be considered in the overall master-planning as well as affordable housing for young people. Furthermore, such master plans should be given force as planning documents by being adopted as Area Action Plans. This is particularly important where a SUE involves multiple owners.

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

We have none to offer at this stage.

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? Yes/No; What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?

In most cases exporting homes is likely to exacerbate problems in other Local Authorities. However, where OANs in neighbouring authorities have been increased on the basis of migration trends, and those trends rely on migration from the Black Country, it may be that some of those OAN figures should actually be deemed to reduce need in the Black Country, thus avoiding double-counting.

Question 15b - Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details.

We have none to offers at this stage.

Question 15c - Do you think there are ways to ensure that exporting housing will meet the needs of people who would otherwise live in the Black Country? (e.g. transport improvements, provision of affordable housing, creation of employment opportunities) Yes/No; If yes, please provide details.

It depends how far out the export is.

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).

Assuming land is needed, we do not support any one of these options in particular. The approach should be varied according to the landscape and transport impacts, as well as Green Belt aims. It will be important that any sites which are released are not just justified by numbers but serve a strategic need for the sub-region. This may mean restricting such releases to sites over 20 has.

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?

See Question 16. Rail Access should be important in this case and access to public transport for employees.

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).

We do not offer any sites.

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)

See Question 17.

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).

See Question 17.

Question 19a - Do you support Spatial Option E4? Yes/No; Any further comments?

See Question 17.

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)

See Question 17.

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

See Question 17.

Question 20 - Do you think there are any other deliverable and sustainable Employment Land Spatial Options? Yes/No; If yes, please provide details.

See Question 17.

Question 21 - Do you think that changes are required to Policy DEL1 to ensure it covers both development within the existing urban area and any within the Green Belt?

Yes/No; If yes, please provide details.

We do not have any suggestions to offer at this stage.

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.

Not at this stage. But note our concern about the aging population who will have specific needs.

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.

Not at this stage. But note our concern about the aging population who will have specific needs.

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.

Not at this stage. But note our concern about the aging population who will have specific needs.

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.

Not at this stage. But note our concern about the aging population who will have specific needs.

Question 26 - Do you have any evidence of a requirement for new physical infrastructure to serve existing needs? Yes/No; If yes, please provide details of the type of facility and where it should be located.

See our later comments on transport infrastructure.

Question 27 - Do you have evidence of pressure being placed on the capacity of current physical infrastructure which could be exacerbated by new developments? Yes/No; If yes, please provide details.

The rail network is under considerable pressure with lines such as the Chase Line carrying large increases in passengers. New development outside the conurbation could exacerbate this. There are issues of parking, for example at Stourbridge Junction, where it has reached capacity restricting passenger growth on that line. A balanced approach to the provision of car parking and public transport access is needed to ensure rail growth is maximised.

Question 28 - Do you think physical infrastructure is necessary to serve large new housing developments? Yes/No; If yes, what type and scale of physical infrastructure is necessary?

Yes, all types.

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.

No comments at this stage.

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.

Green Belt sites inevitably compete with brown field sites. One of the purposes of Green Belt is to support urban regeneration. We do not believe the need for Green Belt sites is as great as anticipated, but (if they are designated) phasing should be used to control how much land comes forward at once, thus supporting urban regeneration.

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 comment at this stage.

Question 32 - Do you think that the proposed approach to incorporate health and well-being issues in the Core Strategy review is appropriate? Yes/No; If no, please provide details

We welcome the use of health impact assessments of the strategy. We would like to see a strategy to increase the health of the population from cradle to grave, which would include encouraging access to open space and the countryside for all members of the community and improving walking and cycling provision and take up.

We are less convinced of the reliance on sustainability appraisals for new sites, particularly large scale Green Belt incursions. SAs are likely to assume some sort of development will go ahead at the site and then seek the best option. SAs are useful in terms of how individual sites are developed but are not designed to answer the question: is releasing the site at all necessary or desirable?

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?

There are a whole range of interventions which are needed to improve health and well being. The Garden City approach, with its emphasis on environmental improvement and enhancement, is one element. Providing improvements to sustainable transport modes is another key element. Addressing the quality of existing housing stock is also needed. Providing local facilities, for health, education and leisure is also key and ensuring these are accessible to all.

There is also a need to specifically address the needs of the increasing number of older people. This includes policies to ensure there is adequate supply of housing which is suitable for older people in locations where they have access to facilities. This will also reduce the prevalence of loneliness and other health issues among the elderly.

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; Any further comments?

Yes, provided there is a proper assessment of alternative approaches rather than just how to deliver the site.

Question 34b - What design features do you think are key to ensuring new development encourages healthy living, which could be accessed through the HIA process?

In terms of detailed design, environment, permeability and access to public transport are key. There is also a need to ensure enough housing is with design features for those less able.

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

We support the reduction in the discount figure. We support a windfall allowance, although, as set out above, we believe the level of larger windfalls should assume a continuation of current trends. Consideration of how to achieve more mixed used development in centres and a reduction in vacancy rates should also be considered.

Question 36 - Do you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed? Yes/No; If yes, what standards should be applied instead, for example should the minimum net density of 35 dwellings per hectare be increased to maximise brownfield housing delivery?

Table 8 is useful but, given the issue of an aging population, the table should also include a provision for housing which is designed to meet that specific need.

We would support an increase to 40 dph, provided there was flexibility for sites where environmental or local character meant that was not appropriate.

Question 37a - Do you think that the existing Policy HOU2 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why

We are content with 15 homes but the policy needs to require all developers to establish that they have sought to use land in an efficient way, even under 15 homes.

Question 37b - If no, should it be reduced to 11 homes or more? Yes/No; If no what other threshold should be used and why?

While we are content with 15 homes the policy needs to require all developers to establish that they have sought to use land in an efficient way. If that is not deemed practical it may be worth reducing it to 11 homes.

Question 38 - Do you think that the current accessibility and density standards are appropriate for green belt release locations? Yes/No; If no, what standards should be applied in these locations and why?

We do not believe that Green Belt sites should have lower access standards. It is important that the inevitable impacts on sprawl and sustainability are mitigated by the provision of local facilities and by the use of good urban design. In particular, Green Belt developments have typically been poorly designed for public transport accessibility and walking and cycling. However, whatever standards are implemented, local character and environmental considerations must also be considered.

Question 39 - Do you think separate accessibility standards are needed for particular types of housing e.g. housing for the elderly or affordable housing (as occupiers may be less mobile and more dependent on public transport)? Yes/No; If yes, please provide details.

There is a need to ensure housing for the elderly and the disabled is fully accessible and takes account of the deterioration in mobility that may lead to people being unable to stay in their own home. However, this might be better resolved with a separate policy which sets out the requirement for housing for the elderly, along with the criteria for ensuring that meets their needs.

Question 40 - Do you agree that the 2017 SHMA findings should be used to set general house type targets for the Plan period? Yes/No; If no, please explain why.

They can assist but the need is not only to identify how many houses with a particular number of bedrooms but to ensure new housing is provided to meet specific needs, such as the increase in older residents and the need for affordable homes for young people.

Question 41a - Do you support the introduction of a policy approach towards self and custom build housing in the Core Strategy? Yes/No; If yes, would you support:

Yes, a policy is required. This could help in a modest way to ensure small windfall sites come forward for development.

Question 41b - A target for each authority? Yes/No; Any further comments

We do not have a view.

Question 41c - A requirement for large housing sites to provide serviced plots? Yes/No; Any further comments?

We do not have a view.

Question 41d - Another approach altogether? Yes/No; If yes, please specify.

We do not have a view.

Question 41e - Do you support the use of a variety of local approaches to Houses in Multiple Occupation (HMOs) across the Black Country? Yes/No; If no, please explain why.

This is an issue in some areas of the Black Country, which can undermine an area if there is not the infrastructure to support HMOs. Not only can it lead to traffic congestion, it can overwhelm local health and education provision. Some HMOs appear to be of poor quality and not necessarily managed in a way which benefits the local community. As we understand it Local Authorities have powers to require planning permission where there is a problem with HMOs. While, it is probably not for the Core Strategy to be prescriptive it could refer to those powers.

Question 42 - Do you agree that the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? Yes/No; If no, please explain why.

Yes, we agree there is a need for sufficient affordable homes.

Question 43a - Do you think that the existing Policy HOU3 site size threshold should be kept at 15 homes or more? Yes/No; If no, please explain why.

We are concerned about the way in which thresholds work. If the threshold is 15, it encourages developers to bring forward schemes for 14 houses, so that they do not have to

comply with the more onerous requirements above the threshold. Where there is an affordable housing requirement of 35% (and some councils are managing 40%) affordable, and the threshold is 15, the developer of a 15-house site will have to provide 5.25 affordable houses, but the developer of 14-house site will provide zero. Since affordable houses are less profitable, the threshold provides a perverse incentive not to build affordable houses. Given the need a lower threshold might be desirable, (always taking account of local character.) and this would be in line with NPPG but we would like to see consideration of how to ensure affordable homes on smaller sites.

Question 43b - If no, should it be reduced to 11 homes or more? Yes/No; If no, what threshold should be used?

Given the need a lower threshold would be desirable, taking account of local character. This seems to be in line with NPPG. We share the concerns expressed in the Preferred Option that an increase in the provision of starter homes which are not genuinely affordable may impact on other affordable tenures and would welcome work to try and address this issue within the current regulations.

Question 44a - Do you think that the affordable housing requirement for eligible sites in Question 43 should be kept at 25% of the total number of homes on the site?

Yes /No; Any further comments?

Consideration needs to be given to the location of the sites. See answer to Question 45.

Question 44b If no, should the percentage be increased to allow for the provision of affordable home ownership? Yes/No; If yes, what should the percentage be and why?

Consideration needs to be given to the location of the sites. See answer to Question 45.

Question 45 - Should an increased affordable housing requirement be set for green belt release sites, to reflect the likely financial viability of these sites? Yes/No; If yes, what should this be.

Yes, we would support this provided those Green Belt sites were also designed to be in sustainable locations with good access to local facilities as affordable housing is likely to be needed disproportionately by people with mobility issues or without access to a car.

Question 46 - Do you agree with the proposed new gypsy, traveller and travelling showpeople accommodation targets? Yes/No; If no, please explain why.

Gypsies and other travelers are as entitled to a home as much as the settled community, but the location of their sites should be subject to the same criteria as for the settled community. The frequency of recent incursions on to public and other open space suggests there is a significant unmet need, which ought to be met. We are not able to comment on the specific figures but agree that sufficient sites need to be supplied to avoid illegal en-

campments. No Green Belt sites should be released unless exceptional circumstances can be proved.

Question 47 - Do you think that Policy HOU5 should be expanded to cover other types of built social infrastructure and to set out standards for built social infrastructure to serve major housing developments? Yes/No; If no, please explain why.

Yes, there is a need to address the availability and funding of all relevant facilities. There is a need to identify in this policy the impact of provision of housing for the elderly so that locational decisions on facilities are taken in the light of where the less able may be living.

Question 48 - Do you agree that the requirement in HOU5, to demonstrate there is adequate alternative provision to meet the needs of the community served by a facility which is to be lost, should be reviewed? Yes/No; If yes, please explain why.

We support the current policy.

Question 49a - Is there still a need for existing Policy DEL2 in order to manage the release of poorer quality employment land for housing? Yes/No; If no, please explain why.

Yes. Since employment land may become vacant that is not allocated and there is a need to examine its potential for release for housing and balance the benefits of alternative uses. In some cases these may not be housing. It may even be the land would be better used for open space or nature conservation. Perhaps the policy should allow for that.

Question 49b - If yes, should this policy be used to assess the release of employment land to alternative uses, other than housing? Yes/No; If yes, please explain why.

See answer to 49a

Question 50 - Do you think that the Core Strategy should continue to set a target for the total employment land stock in Policy EMP1? Yes/No; Please explain why.

The overall provision of employment land may not be as relevant as the changing nature of jobs today means they are less dependent on land allocations. If land goes out of employment use because a factory closes, for example, it may not be as important to replace that land as to provide the kind of sites needed for new jobs.

Do you think that distinguishing between Strategic High Quality Employment Areas and Local Quality Employment Areas is still appropriate? Yes/No; Please explain why.

Yes, provided the Black Country is seeking to improve the quality of existing sites and not simply relying on new allocations.

Question 51 - Do you think that the criteria used to define Strategic High Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?

We do not have a view at this stage.

Question 52 - Do you think that the criteria used to define Local Quality Employment Areas are appropriate and reflect actual market requirements? Yes/No; If not, how do you think the criteria and/or terminology should be amended?

We do not have a view at this stage.

Question 53 - Do you think that Strategic High Quality Employment Areas should continue to be protected for manufacturing and logistics uses, with the other uses set out in Policy EMP3 discouraged? Yes/no; If not, what alternative approach do you recommend?

Yes, we support this approach. High Quality land should not be squandered, both because it is needed to high quality jobs and because it can lead to environmental and countryside impacts if it has to be replaced

Question 54 - Do you agree that the current approach in Policy EMP4 is no longer fit for purpose and should be amended to reflect a portfolio based approach? Yes/No; If no, what alternative approaches would you recommend?

We agree that a balanced portfolio is likely to be a better approach.

Question 55 - Do you agree with the proposal to retain Policy EMP5? Yes/No; If no please explain why.

Yes.

Question 56 - Do you agree with the proposal to update Policy EMP6 in line with current priorities? Yes/No; If no, please explain why

Yes.

Question 57 - Do you support the proposal to merge Policy CEN1 and Policy CEN2, given that both policies focus on the overall strategy in the Black Country, including the hierarchy of centres? Yes/No; If you have any comments on Policies CEN1 and CEN2 please provide details.

Yes, provided the emphasis is retained and not diluted.

Question 58 - Do you think there is any evidence to suggest that the hierarchy of centres is not appropriate going forward in the context of the regeneration strategy? Yes/No; If so, please provide details.

No. Depending on where new housing goes there may be a need for additional local provision but the main four centres should remain the backbone of the spatial strategy.

Question 59 - Have all the appropriate centres within the Black Country been identified? Yes/No; If not, please specify additional centres.

Yes.

Question 60 - Is there evidence to suggest that identified centres are no longer performing as a centre or at their identified level in the hierarchy? Yes/No; If yes, do you agree that they should be moved / removed within or out of the hierarchy?

No.

Please explain why.

Question 61 - In addition to para 4.33 of the current Core Strategy should the revised Core Strategy include criteria for the creation of new centres that might be needed as a result of any additional housing identified through the plan? Yes/No; Any further comments

No. Depending on where new housing goes there may be a need for additional local provision but the main four centres should remain the backbone of the spatial strategy.

Question 62 - Do you agree that the Strategic Centres should remain the focus for large scale comparison retail (clothes, white goods etc), office and major commercial leisure development in the Black Country? Yes/No; Any further comments?

Yes, as well as seeking to increase housing provision within and close to those centres.

Question 63 - Do you agree that the targets for comparison retail floorspace and office floorspace should be revisited as part of this review to take into account current and future trends? Yes/No; Any further comments?

We are not able to give a detailed response but in general we consider that the policy should encourage a balance of development in the centres so they are attractive places to visit which serve a variety of needs. This may even mean a reduction in retail and an increase in leisure. It is probably as important to consider the quality of the retail offer and ensure anchor stores remain or are introduced.

A key element in the future of the main centres (and smaller ones) will be masterplanning to ensure there is a balance of provision. The introduction of a variety of uses will help centres to thrive. It is probably not for the Core Strategy to be too prescriptive but it should also not assume the pattern of retail will remain the same.

Question 64 - Is there a need to set targets for convenience retail floorspace in the Core Strategy? Yes/No; Any further comments?

We are not able to give a detailed response. A balanced approach is required and in some cases it may be better to reduce retail floorspace on the edge of centres to encourage a balance of uses. In particular the role of larger supermarkets may change in the future and require less land allowing for more mixed use on those existing sites and the introduction of smaller convenience stores.

Question 65 - Should the Core Strategy set any targets or policy requirements for leisure development in the Strategic Centres? Yes/No; Any further comments?

The strategy should encourage leisure facilities to be located in centres where they are accessible to all. This should include night time facilities as long as there is suitable planning to avoid and manage any anti-social behaviour.

Question 66 - Should the Core Strategy set new housing targets for the Strategic Centres through the review? Yes/No; Any further comments?

The strategy should encourage housing in centres. It should not only consider how much is needed but what kind of housing will best support those centres and, more widely, the overall strategy. For example, encouraging young entrepreneurs or professional workers to move into the centres may be key to developing the future economy more widely. In general we would like to see more use of upper stories over shops for housing.

Question 67 - Do you think there are any other uses and/or developments that should be planned for in the Strategic Centres? Yes/No; Please provide details.

There is a need to encourage the greening of centres, including provision of trees and other green features which have been lost in many. Their links to local green space, (for example Walsall Arboretum,) should also be promoted.

There is also a need to ensure centres are walkable with access to centres by sustainable modes from surrounding areas encouraged.

Question 68 - Do you agree with the proposal to re-examine the detail and appropriateness of the existing conditions for retail growth at Merry Hill through the Core Strategy review? Yes/No; Do you have any further comment to make on this issue?

We support the current conditions.

Question 69 - Should more types of uses be encouraged and more flexibility be allowed to ensure the regeneration and vitality of the Black Country Town Centres? Yes / No; Please explain why.

Some flexibility is desirable provided it leads to a balance of uses and especially improves the quality of the centres.

Question 70 - Do you think there are any specific developments or uses that should be supported in any particular Town Centre? Yes/No; Please provide details.

We have no examples.

Question 71 - Should the Core Strategy set housing targets for the Town Centres? Yes/No; Please explain why.

Yes, the core strategy should seek housing within town centres but these might exceed any targets.

Question 72 - Should more types of uses be encouraged and more flexibility be allowed to ensure the regeneration and vitality of the Black Country District and Local Centres? Yes/No; Please explain why.

This will vary from centre to centre and some flexibility is required. In particular the contraction of the retail area may in some cases create a more viable centre, both by allowing for housing in the centre and other uses which may attract people to the centre, but it must still be able to accommodate sufficient retail needed to perform its function.

Question 73 - Are there any specific developments or uses that should be supported in any particular District or Local Centre? Yes/No; Please provide details

We have no examples.

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, District and Local Centres? Yes/No; Please explain why.

We support the threshold approach but have no comment on individual levels.

Question 75 - Should thresholds apply to all main town centre uses (Yes) or just retail uses (No)? Please explain why.

There is a case for considering thresholds for some leisure uses where these impact on other centres.

Question 76 - Is the approach set out in Policy CEN6 appropriate in the context of supporting local community needs? Yes/No; Please explain why.

Yes, it remains important to provide local facilities.

Question 77 - Does the wording of the criteria clearly achieve the objectives of the centres strategy? Yes/No; Please explain why.

Yes.

Question 78 - Should the policy clarify that this policy applies both to applications in edge-of-centre and out-of-centre locations, and should this also be referred to in the relevant centres policies? Yes/No; Please explain why.

Yes.

Question 79 - Should the policy set what types of uses this policy applies to and set out any further types of material considerations that could be relevant for the determina-

tion of certain proposals, for example, the location or concentration of hot food takeaways, premises selling alcohol or gambling operations? Yes/No; Please explain why.

Yes, this is important as the aim is to provide day to day facilities which support the community.

Question 80 - Should the policy clarify that those schemes of multiple units, where individual units are below the set figure, but the cumulative figure is above, also need to meet the relevant requirements of other centres policies? Yes/No; Please explain why

Yes.

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/No; Please explain why.

Yes, large out of centre retail is not likely to be sustainable and will not provide access for all parts of the community.

Question 82 - Is 200sqm (gross) an appropriate scale of development above which the impact tests should apply? Yes/No; Please explain why.

We do not have a view on the exact level.

Question 83 - Should Policy CEN7 provide more guidance on accessibility? Yes/No; If yes, please explain why .

Yes, that would be helpful, provided that guidance is to ensure a development is as sustainable as it can be and the guidance is not considered a justification for development in principle.

Question 84 - Do you think that Policy CEN8 is still appropriate for managing car parking in centres and will ensure the network of Black Country Centres are maintained and enhanced over the plan period? Yes/No; Please explain why.

Yes, in general. There is a need to ensure parking serves the whole of centres and to avoid restrictions, for example, of parking to individual supermarkets or leisure facilities which then harms a centre or adds to traffic movements in the centre. We raised concerns when the plan was originally devised that lower parking standards where public transport is poor could encourage developments which were very car dependent in those locations. We remain concerned about this and the review needs to consider the evidence in relations to this and whether parking standards at out of centre locations are tight enough to ensure there is an incentive to encourage use of alternative modes.

Question 85 - Should Policy CEN8, with regards to pricing of car parks, continue to be applied to Strategic Centres to ensure that pricing of parking is not used as a tool of competition? Yes/No; Please explain why.

Yes. And also to ensure car parks serve the whole of the centre and not a single retailer which reduces footfall across the centre and can lead to additional congestion if people park twice. The control of Long Stay car parking, in particular, remains critical to supporting public transport. Short stay car parking should not be so expensive it puts people off visiting a centre.

Question 86 - Do you think that there are other centre uses or centres issues that need to be addressed in the centres policies? Yes/No; Please provide details.

None come to mind.

Question 87 - As shopping, leisure and other commercial trends continue to change, should the revised Core Strategy have a policy to reallocate out-of-centre attractions that are no longer viable for town centre uses for alternative uses such as for employment uses or housing? Yes/No; If no, please explain.

Yes. The Core Strategy needs to consider this as well as anticipating a reduction in store size from major supermarkets and other stores as they refurbish or replenish their estate. In particular where new facilities in a centre reduce the need for out of centre uses alternative uses of those sites may be desirable.

Question 88 - Do you agree that the overall transport strategy supports all of the Core Strategy spatial objectives? Yes/No; Please explain why.

Yes, in general we support the strategic aims. However, we do not believe the ambition is adequate in terms of public transport improvements and support for walking and cycling.

As well as on-road provision for sustainable modes we would support extensions to the network of Green Routes offering links into the countryside (including across into Worcestershire and Staffordshire).

We also believe there is still a case to consider demand management options which will support modal change and also fund public transport improvements. However, without ongoing work on this it is hard to be more prescriptive.

Question 89 - Do you support the proposed changes to the priorities for the development of the transport network? Yes/No; Please explain why.

We generally support the proposals to improve public transport in the sub-region. However, we consider they lack the necessary ambition. In particular we would like to see a rail network developed systematically across the region, including the links centered round Walsall including to Wolverhampton, Sutton Coldfield, Brownhills as well as the through route from Lichfield to Stourbridge. This would require consideration of additional heavy rail lines on the Wednesbury to Brierley Hill section or alternatively Metro extensions along the whole route. We support improvements to the bus network but these need to be integrated with

rail. We agree that rail freight should be encouraged but this needs to be at an appropriate level. We are not in favour of the massive Four Ashes Proposal in South Staffordshire.

We are concerned that hard shoulder running is being progressed simply to deal with congestion on motorways with little consideration of the impact of the additional traffic. While this is in many cases preferable to motorway widening we would like to see analysis of the comparative benefits of investing that money in public transport options.

Question 90 - Do you support the proposed changes relating to managing transport impacts of new developments? Yes/No; If no, please explain why

The provision of charging points is welcome. However, this does not address congestion issues so it is important that policies to change behaviour are pursued as well.

Question 91 - Do you support the proposed changes relating to the efficient movement of freight? Yes/No; If no, please explain why.

We support the use of Bescot for a rail freight interchange, taking full account of the impacts on local people. We are not in favour of Four Ashes which we consider is too big. We regret the fact that the proposal is being taken through the NIC process rather than being subject to local scrutiny that would examine how well it fits in with the needs of the Black Country and whether its impact on Green Belt, the environment and local roads is acceptable.

Question 93 - Do you support the proposed changes to Policy TRAN5? Yes/No;

Please explain why.

In general terms we support the development of a Key Route Network. The development of new technology is also welcome but should be seen alongside encouraging modal shift.

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.

We support the emphasis placed on environmental enhancement and place making. However, CSP3 and CSP4 do not sufficiently emphasise the rural character of parts of the Black Country. Even if there is some development in the Green Belt the environmental policies should emphasise the value of this remaining countryside in terms of landscape, amenity, farming, environmental and biodiversity .

Question 95a - Do you think Garden City principles should be applied in the Black Country? Yes/No; If yes, how should they be applied?

We support the Garden City approach in general provided a balance is properly applied between landscape, biodiversity and other aspect of the environment.

Question 95b - Should the application of Garden City principles be different for brown-field and greenfield sites? Yes/No; If yes, please explain why.

In general we would like to see the application of similar approaches to density, character and environmental enhancement. However, this needs to be sensitive to local character and landscape which this may influence how specific sites are developed.

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 welcome the inclusion of ancient woodland.

Question 97 - Do you support the proposed changes relating to Historic Character and Local Distinctiveness? Yes/No; If no, please provide details of any other changes that should be made to Policy ENV2.

We support the need to protect historic assets, including those which are not designated. The review should include an assessment of the effectiveness of the current policy in relation to non-designated assets, for example, the integrity of areas of Victorian terracing. This should be used to review these policies and how they can be enhanced.

Question 98 - Do you support the proposed changes relating to Design Quality?

Yes/No; If you think that any other changes should be made to Policy ENV3 please provide details.

We support high quality design but are not able to comment on the details.

Question 99a - Do you think that national standards for housing development on water consumption should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.

We support the need to reduce water consumption but are not able to comment on the details.

Question 99b - Do you think that national access standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.

Yes, there is a need to ensure homes are fully accessible, taking account of local character. This will become more important with an aging population.

Question 99c - Do you think that national space standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.

Yes, there is a need to ensure homes have adequate space standards, taking account of local character. This will become more important with an aging population.

Question 99d - Do you think that the standards should be different for brownfield and greenfield sites? Yes/No; If yes, please explain how and why.

Not in general, but may depend on local circumstances.

Question 100 - Do you support the removal of the reference made to canal projects?

Yes/No; Do you think that any other changes should be made to Policy ENV4?

Please provide details.

No, we do not understand the removal of reference to canal projects. We agree they need to be determined at a local level, but the reference in the core strategy is important because the network is a strategic as well as a local asset. The policy could be up-dated to acknowledge the fine grained nature of such projects and allow flexibility within a broad approach.

The policy should also add that canals act as an important link between town and countryside in the sub-region.

Question 101a - Do you support the proposed changes relating to Flood Risk, Sustainable Drainage and Urban Heat Island effects? Yes/No; Further comments?

Question 101b - Do you think that any other changes should be made to Policy ENV5? Yes/No; If yes, please provide details.

We are not in a position to comment.

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

See 102c.

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

See 102c

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.

We support the need for policies to protect and enhance open space across the sub-region. We believe it should be central to the policy for regeneration.

It needs to also be acknowledged that many open space areas on the edge of the conurbation act as links to the surrounding countryside and are often integral with it. Improvements to open space which have countryside benefits (such as the large scale tree planting

creating a country park at the Grange in Walsall) should be encouraged as well as promoting planting in gardens and institutional grounds.

It is also important to stress the need to ensure these areas continue to be managed and not allowed to decay.

Question 103a - Do you think that Policy ENV7 should be changed to allow increased energy efficiency standards to be accepted in lieu of renewable energy provision for non-domestic buildings? Yes/No; If not, please explain

We are not in a position to comment.

Question 103b - Do you think that the 10% requirement should be changed?

Yes/No; If yes, please specify what percentage would be more appropriate and to what type of site it should apply.

We are not in a position to comment.

Question 104 - Do you support the proposed changes relating to Air Quality?

Yes/No; If you think that any other changes should be made to Policy ENV8 please provide details.

Improving air quality is critical to the health and well-being of the sub-region. We have no comments on the detail.

Question 105 - Do you think that Policy WM1 identifies all of the key waste issues that need to be addressed in the Core Strategy, in accordance with national policy?

Yes/No; If not, please specify what changes should be made to the Policy.

If you have any evidence that can be referred to in the Waste Study, please provide details.

We support the approach of aiming to reduce waste and deal with waste within the sub-region as close to where it arises as is practical. New or extended waste sites should be assessed on their impact on the landscape and countryside.

Question 106a - Do you support the approach set out in Policy WM2?

Yes/No; If no, please explain why.

See 105

Question 106b - Are there any strategic waste management sites that no longer need to be protected? Yes/No; If yes, please provide details

Question 106c - Are there any new sites that do need to be protected? Yes/No; If yes, please provide details.

See 105

Question 107 - Do you think that there are any strategic waste management proposals that should either be removed from or added to the list in Policy WM3?

Yes/No; If so, please provide details.

See 105

Question 108 - Do you agree that Policy WM4 provides an appropriate level of control over the location and design of new waste management facilities? Yes/No;

If no, what changes do you think should be made to the Policy?

See 105

Question 109 - Do you agree that Policy WM5 provides an appropriate level of control over resource management for new developments? Yes/No; If no, what changes do you think should be made to the Policy?

We support the approach of aiming to reduce waste and deal with waste within the sub-region as close to where it arises as is practical. New or extended waste sites should be assessed on their impact on the landscape and countryside.

Question 110 - Do you think that Policy MIN1 identifies all of the key minerals issues that need to be addressed in the Core Strategy, in accordance with national policy? Yes/no; If no, what changes should be made to the policy?

We do not have a comment at this stage.

Question 111 - Do you agree with the proposed change to ‘prior extraction’ requirements, to maintain a size threshold in urban areas and increase the threshold for green belt sites to 3 ha? Yes/No; If no, what evidence do you have to justify an alternative approach?

We have concerns about raising the threshold in Green Belt. Where development occurs in Green Belt it needs to take account of minerals. The policy does not imply mineral extraction will occur only be considered. The policy could be strengthened to take greater account of both the impact on the landscape/environment of extraction and any benefits to be gained.

Question 112a - Are there any key mineral related infrastructure sites that no longer need to be protected? Yes/No; Please provide details

We are not able to comment.

Question 112b - Are there any other sites that do need to be protected? Yes/No; If yes, please provide details.

We are not able to comment.

Question 114 - Do you have evidence of workable, viable deposits of brick clays outside the areas of search, which could justify defining new areas of search?

Yes/No; If yes, please provide details.

We are not able to comment.

Question 115a - Do you have evidence of any realistic possibility of fracking in the Black Country? Yes/No; If yes, please provide details.

It seems unlikely that fracking sites would be realistic in the Black Country. Should they exist they would inevitably be in areas of countryside and policies to address them should take account of the impact on landscape and biodiversity as well as the safety and suitability of the access to the site (as defined in NPPF), especially given the reliance on OGVs (the heaviest form of HGVs) to carry equipment and waste water to and from the site. Any policy would need to clearly apply to testing and monitoring as well as production.

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.

See 115a

Question 116 - Do you think that Policy MIN5 identifies all of the key issues that need to be addressed in relation to new mineral developments in the Core Strategy, in accordance with national policy? Yes/No; If not, what changes should be made to the policy?

We do not have a comment.

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

We do not have a comment.