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**From:** [REDACTED]  
**Sent:** 07 September 2017 22:27  
**To:** Blackcountrycorestra  
**Subject:** Issues and Options Consultation - Comments of West Midlands Campaign for Better Transport  
**Attachments:** Black Country Core Strategy Response Form - Issues and Options Consultation - comments of wmcbt.doc

Please find attached our comments in connection with the Issues and Options Consultation for the Black Country Core Strategy. Please can you acknowledge receipt of these. Should you have any questions regarding our comments, please do not hesitate to contact the writer.

Please can you also add our contact details to your database so we may receive further updates regarding the Core Strategy as it is developed over the coming months.

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**Chair, West Midlands Campaign for Better Transport**

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## **BLACK COUNTRY CORE STRATEGY – ISSUES AND OPTIONS REPORT COMMENTS OF WEST MIDLANDS CAMPAIGN FOR BETTER TRANSPORT**

The Campaign for Better Transport is a national campaign promoting the use of sustainable transport such as walking, cycling and the use of public transport such as buses, rail and Metro. We want to see the creation of a transport system that is a real alternative to the private car.

We welcome the publication of the Issues and Options report for the proposed revised Black Country Core Strategy and would make the following comments. For ease of reference, they are tied to the questions given in the on-line questionnaire webpage [http://online.dudley.gov.uk/surveys/bccsurvey2017/bccs\\_planning\\_survey\\_2017.htm](http://online.dudley.gov.uk/surveys/bccsurvey2017/bccs_planning_survey_2017.htm) but are in a different order.

### ***Working with our neighbours***

#### ***Are there any West Midlands wide issues that the Black Country Core Strategy needs to consider?***

Whilst the Black Country authorities have worked together to produce the Core Strategy, which effectively sets the planning policy for Dudley, Sandwell, Walsall and Wolverhampton, the Black Country should not be seen in isolation from the rest of the West Midlands conurbation or from the authorities in Staffordshire neighbouring the Black Country. There are a number of challenges facing the wider region and there needs to be joint working between authorities to tackle them. The West Midlands Combined Authority has emerged since the first Black Country Core Strategy was adopted in 2011, and it is clear that despite the set up for LEP's in the West Midlands that has seen three created including one for the Black Country there needs to be a West Midlands approach to meet the needs of the economy.

By far the biggest challenge facing the West Midlands is housing. The preamble to the Core Strategy suggests 22,000 new homes are needed. The "Birmingham Plan", published by Birmingham City Council and approved by the Planning Inspectorate suggested 51,000 new homes are needed by 2031<sup>1</sup>. One question that should be considered is whether the Black Country should look at assisting Birmingham by providing some of the additional homes that are needed by the city within its area. It is also notable that housing in the Black Country is often cheaper than that within the city of Birmingham, which will contribute to demand for commuting between the two areas.

The environment is also a key challenge. The links between air quality, pollution and public health are becoming better known, with recognition people living near to motorway and trunk corridors in urban areas suffer and have a poor quality of life. Planning leading to development being more car dependent is not the way to go; developers and local councils need to ensure sustainability.

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<sup>1</sup> <http://birminghamnewsroom.com/government-inspector-endorses-birmingham-development-plan/>

Developments should be located near frequent, high quality public transport services (not an hourly bus that finishes at 6 p.m.), have the infrastructure needed for sustainable transport (e.g. cycle lanes, well lit footpaths for pedestrians) and should be future proof. There has recently been a lot of discussion about electric cars in the future and a number of manufacturers have indicated production of petrol and diesel engine cars will cease in the 2020's, in order to address air quality concerns.

However, there is a dearth of charging points for electric vehicles. New developments should provide these as a matter of course. Adapting existing buildings (some of which were built before mains electricity was widely available) will be even more challenging.

### ***Meeting housing needs***

***Should the extra new homes needed across the Black Country be built on Green Belt land only?***

***Employment land (where businesses currently operate) as well as some Green Belt?***

We would **not** support housing development solely taking place on the Green Belt. Public transport connectivity to Green Belt sites around the Black Country and in neighbouring authorities is often poor with infrequent bus services or no local rail service (Brownhills springs to mind along with Hasbury). If development is to take place in Green Belt then there needs to be improvement to the public transport offer, coupled with good facilities for walking and cycling.

### ***Supporting our town centres***

***Should we focus the growth of shopping, leisure and commercial development into our main town centres?***

It's now clear that we are seeing a massive change in people's retail habits and in the way they do business, which will have an impact both on town centres and traditional high streets.

More and more people are now shopping on-line, covering everything from fashion and electrical appliances to the weekly supermarket shop. Financial transactions which used to be done in banks and post offices are increasingly being done on-line, with banks thinning their network of branches. Visiting the local council office to submit a planning application or apply for a blue badge during office hours is inconvenient – doing the process via a website open 24 hours a day is preferable for many citizens.

It is noticeable that the number of empty shops and offices is increasing. Dudley town centre has lost retailers owing to Merry Hill and out of town retail parks, but the pace has increased. Walsall town centre has pockets where there are empty shops and offices – although small businesses have kept the centre thriving.

Naturally the local authorities should do what they can in order to continue to support town centres and encourage small retailers to set up in empty units – particularly in properties they own. However, it is clear that there will be a reduction in “bricks and mortar” retail and a number of properties will become redundant. Even the “out of town” retail parks and supermarkets may reduce as retailers focus more on digital channels and home delivery. This may provide opportunities for local authorities in terms of what effectively would be “brownfield” sites which can be apportioned for other uses, for example housing or new commercial development to serve different uses such as manufacturing or leisure.

Indeed, increasing the proportion of housing in town centres may well be attractive as they are also transport hubs with good bus, rail and Metro connections. They also have local facilities and services nearby for the things that cannot be done over the internet.

Town centres should be developed and mixed use should be encouraged. They should not be left to wither and die. The Core Strategy must look at how town centres can be planned to ensure their continued vibrancy and look at all uses, not just retail and commercial development.

### ***Protecting the environment***

#### ***Which types of environmental areas should be provided to serve new developments?***

Despite the industrial image the Black Country has been blessed with green space such as the Arboretum in Walsall and Mary Stevens Park in Dudley. This should be protected.

If there is large scale new development proposed “green space” should be provided. A park is multi use, it can provide a good route for pedestrians and cyclists (provided the paths are well lit and maintained) as well as being a facility for other uses.

### ***Keeping the Black Country connected***

#### ***What transport improvements do you think are required across the Black Country to improve our area’s connections?***

The geographic location of the Black Country means that it is not just a question of dealing with local flows of people and goods, two major motorways (M5 and M6) pass through as well as the West Coast Main Line – all vital parts of the strategic national transport network. The recent works on the M5 demonstrate that a lot of local journeys are being made on the motorway network, adding to the congestion and pollution that is blighting the area. It is essential for there to be modal shift of these local journeys to other modes of transport. Building new roads or widening new roads is not a sustainable option and will lead to more traffic.

Likewise the local rail network is full and operating at peak capacity. There is a need to address this quickly so there is space for modal shift and growth.

The Core Strategy references the *Movement for Growth* work done by the West Midlands Combined Authority. This covers a period to 2026. It is essential the Wednesbury – Brierley Hill Metro extension is operable well before 2026. The bus services between Dudley and Birmingham City Centre are hamstrung by congestion and it can take over an hour in the peaks to travel from the centre of Dudley to the centre of Birmingham. The Stourbridge – Birmingham railway line is standing room only during peak time and the car parks at local stations are often full by 08:00. There is a need to crack on with the Wednesbury – Brierley Hill Metro line and not delay matters any longer.

Looking ahead beyond 2026, the Core Strategy should be looking at what transport infrastructure will be needed to support the region. Network Rail has recently published their West Midlands Route Study<sup>2</sup>, giving options for funders. However, it may be desirable to look beyond the options contained in the route study in terms of providing additional capacity.

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<sup>2</sup> <http://www.westmidlandsrail.com/media/2813/west-midlands-and-chilterns-route-study-summary.pdf>

There are aspirations in *Movement for Growth* for a new local passenger rail service to be introduced from Wolverhampton to Walsall, serving new stations at Darlaston and Willenhall, with Willenhall providing connectivity with planned new development there. We would suggest the opportunity be taken to extend this to Aldridge which would serve this growing town (population 27,000) as well as the villages making up Brownhills (population 12,676). This would also provide connectivity into Wolverhampton where new commercial development is planned in the city centre and at the i54 business park (which is served by a bus route from the city centre and where there are aspirations for either a Metro line or bus rapid transit route).

Whilst Midland Metro should be built between Wednesbury and Brierley Hill, there should also be provision along the Walsall – Stourbridge corridor for rail freight services to provide an alternative for trunk hauls along the M5.

The Core Strategy may wish to look at the provision in the Black Country for freight terminals and hubs. They should be connected to the strategic rail and road networks and should be on brownfield sites rather than Green Belt. Given that there is a change the rail freight market and some of the traditional flows such as coal and metals have declined one question to consider is are the current terminals (for example Wolverhampton Steel Terminal) satisfactory, or do new facilities need to be provided?

#### ***People's health and wellbeing***

***Do you think people's health and wellbeing should be a key issue in the Core Strategy?***

Yes, people's health and wellbeing should be a key issue. Addressing the key transport issues of congestion and air pollution should, if done right and done well, improve people's health and wellbeing. The objective of the core strategy and the test of its success should be ***if it results in people choosing to move into and stay in the Black Country and businesses choosing to locate and invest in the area, because it is a place with an pleasant environment and excellent quality of life.***

***Chair, West Midlands Campaign for Better Transport  
September 2017***