

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 September 2017 12:46  
**To:** Blackcountrycorestra  
**Subject:** Black Country Core Strategy 'Have your say' Issues and Options consultation Response 2017  
**Attachments:** Black Country Core Strategy Response Form (2).pdf

Dear Sirs,

In connection to the above, please find attached representation to the Black Country Core Strategy Review 'Have your Say' Issues and Options consultation.

Should you require any further information regarding the above please do not hesitate to contact me. In the meantime, I would be grateful if you could please confirm receipt of the attached at your earliest convenience.

Yours faithfully

[REDACTED]  
Planning Consultant

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[www.firstcity.co.uk](http://www.firstcity.co.uk)

First City Limited  
First City House  
19 Waterloo Road  
Wolverhampton  
WV1 4DY

**TOWN & COUNTRY PLANNING ♦ DEVELOPMENT LAND AGENTS ♦ PROPERTY VALUATIONS ♦ LANDLORD & TENANT ♦  
PROPERTY MANAGEMENT ♦ SALES & LETTINGS**

**FIRST CITY LTD**, Registered Office First City House, 19 Waterloo Road, Wolverhampton, WV1 4DY. This message, its contents and any attachments to it, are private and confidential. Any unauthorised disclosure, use or dissemination of the whole or any part of this message (without our prior consent in writing) is prohibited. If you are not the intended recipient of this message, please notify us immediately. No contractual agreement may be concluded on behalf of First City Ltd by means of email. Reg. in England No. 1764529. Regulated by RICS.

**Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.**

<b>Chapter / Page / Question / Paragraph</b>
Paragraphs 2.5 - 4.34
<b>Do you agree or disagree with the approach set out in the relevant section and / or question?</b>
Please see comments below
<b>Comments (continue on a separate sheet if necessary)</b>
<p>It has clearly been indicated within the Issues and Options Report that there is a need for additional land to support the development needs both residential and commercial of the Black Country in the coming years. It has been demonstrated that there is insufficient land within the urban area to meet the needs of the four Black Country authorities.</p> <p>It has been shown in paragraph 2.5 that there has been an under delivery of sites within the growth network. Paragraph 2.9 identifies that the Black Country is currently 3,000 homes behind the Core Strategy target trajectory. Paragraph 2.10 states, <i>“There is a large pipeline of major housing sites concentrated within the Growth Network, which have been successfully allocated through the Local Plans. However, many of these sites have multiple constraints and financial assistance will be needed to bring them forward”</i>.</p> <p>Figure 4 Housing delivery 2011-17 shows there has been a significant number of pipeline homes and/or homes completed/commenced outside of the housing and employment led corridors which would be understandable due to the reasons mentioned above.</p> <p>The Black Country authorities and the illustrative plans confirming an under delivery of housing indicate the current strategy has not been as successful as hoped for.</p> <p>The housing need (OAN) for the Black Country over the period 2014-2036 is identified as 78,190 homes.</p> <p>With the inclusion of SHLAA sites it is identified that there is still a deficit in land supply of approximately 21,670 homes (paragraph 3.15).</p> <p>At the time of preparing the Core Strategy some years ago, the Country were feeling the effects of the global recession and there had been many employment sites becoming vacant providing the opportunity for redevelopment for residential uses. However, the economy has greatly improved since that time with employment sites in demand and there is the requirement for an additional 300ha of employment land to meet future needs. We therefore do not consider that the approach of redeveloping employment sites for residential development is the most appropriate strategy for consideration in the Core Strategy Review.</p> <p>Paragraph 3.17 states in bold that there will be the requirement for a, <i>“large number of new homes and supporting services will need to be accommodated outside the existing urban area of the Black Country. All such land in the Black Country is currently Green Belt”</i>.</p>

We support this strategy of allocating land outside of the urban area for residential development.

We support the proposals for a Green Belt review in order to allocate sites to meet future residential development.

The needs of the Black Country are significant. Due to the nature of the four Black Country authorities there is limited opportunities for additional land to be identified within the Boroughs of Sandwell and Dudley due to their dense urban character, Wolverhampton is also lacking in areas of undeveloped land (including the limited land within the Green Belt) to meet the Black Country's needs. Therefore the need to find land will result in the cross boundary cooperation with neighbouring authorities such as South Staffordshire (which borders Wolverhampton, Dudley and Walsall and Cannock Chase and Lichfield (both of which border Walsall) and Bromsgrove (which borders Dudley to the south).

It has been demonstrated that there is a strong link between the Black Country and South Staffordshire and therefore we consider it would understandable to look to South Staffordshire to determine the capabilities of supporting residential development to assist the Black Country and their land supply deficit, in addition to the other neighbouring authorities.

With the current issues facing the Black Country, this needs to be considered in conjunction to the well-publicised housing land supply shortage currently affecting Birmingham, where there is the requirement for approximately 38,000 dwellings to be accommodated outside of the Birmingham administrative boundary.

The Black Country's predicament reduces their ability to assist Birmingham to any great extent and therefore the pressures to identify land within the Green Belt surrounding the West Midlands urban conurbation becomes ever more essential.

We therefore consider the Black Country Authorities should undertake a Green Belt review to identify sites on the edges of the Black Country and enter into robust discussions under the Duty to Co-operate with neighbouring authorities to identify land within their administrative boundaries to identify sustainable sites which are in close proximity to the Black Country authorities for residential development. Due to the current land supply issue and the constraints of the Black Country Authorities it is inevitable that some of the housing needs will have to be met through changes to the Green Belt in the Black Country and sustainable extensions into the adjoining Shires.

Table 2 approach to accommodating growth identifies a number of options for the allocation of land for residential development. We consider options 2A-Housing development outside the Growth Network options H1 – Rounding off the Green Belt and meeting housing needs through a large number of smaller sites and H2- identification of a limited number of large sustainable urban extensions in the Green Belt should be considered going forward as potentially the most appropriate strategy to identifying residential development land as this is the only way to ensure linked infrastructure facilities and services.