

6 September 2017

Dear Sir/ Madam,

Black Country Core Strategy Issues and Options

Thank you for the opportunity to comment on the Black Country Core Strategy Issues and Options document.

Birmingham City Council (BCC) welcomes the review of the existing Core Strategy in response to addressing identified issues and future development needs of the area.

Vision, principles and spatial objectives

BCC supports the broad vision and general sustainability principles that are considered to remain relevant in reviewing the Core Strategy. The majority of the spatial objectives are also considered appropriate, however it is questioned whether 'Objective 3 - Model sustainable communities on redundant employment land in the Regeneration Corridors' should remain as it is, given the acknowledgement in the document that a different strategy may be required to accommodate growth beyond the existing Growth Network.

Housing delivery

It is noted that the Black Country is currently 3,000 homes behind the Core Strategy target and that a large pipeline of supply to meet the current target is on 300ha of occupied employment land. There are concerns about the viability and deliverability of such a large amount of occupied employment sites and the impact on housing supply if such sites do not come forward for housing.

Strategic Options

This section identifies a number of strategic options for accommodating growth through a two stage process. Paragraph 4.21 states that Stage 1 Options will provide an overall steer on how much housing and employment development will need to be accommodated outside the urban area. In reality both Stage 1 options will result in the same amount of development land needed to be accommodated outside the urban area. i.e. Option 1B allocating more occupied employment land for housing in the Growth Network will only result in displacing employment land elsewhere.

A third strategic/ Stage 1 option which may need to be considered is reducing reliance on occupied employment land for housing in light of delivery and viability issues of such sites and employment land needs. This would mean accommodating more housing and employment land outside the urban area.

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Paragraph 3.16 acknowledges that it would be extremely challenging to exceed past levels of allocations on occupied employment land, due to delivery constraints and the need to protect viable employment premises. Therefore, this source of supply is unlikely to exceed a further 10,400 homes over the period 2026-36.

Paragraph 4.31 is supported. If, when all reasonable options have been fully explored, total need still cannot be met within the Black Country, “exporting” to authorities within the Greater Birmingham and Black Country Housing Market Area (HMA) should be explored, as the Black Country has the strongest migration and commuting links with these areas. We would also agree that, if these authorities are not be able to accommodate all of the shortfall, growth can be “exported” to authorities outside the HMA but with existing or potential links to the Black Country, such as Telford & Wrekin.

Development need

It is estimated that further land will be required to provide 22-25,000 new homes and up to 300 ha of new employment land. The methodology for assessing housing need is consistent with that which was found sound at the Birmingham Development Plan examination, and is supported.

Green Belt review

The Issues and Options document recognises that it will not be possible to accommodate all future development needs within the urban area and that a green belt review will need to take place as part of the Core Strategy review.

BCC welcomes the approach of the Black Country to await the completion of the Strategic Growth Locations Study, which is likely to be in October/ November 2017, to inform and provide the basis of a detailed Green Belt review for the Black Country. BCC also supports the prompt completion of this study.

Housing shortfall in the GBBCHMA

Appropriate reference is made to the housing shortfall in the HMA identified by the adoption of the Birmingham Development Plan, and the need for neighbouring authorities to consider accommodating the shortfall through the Duty to Co-operate.

The Black Country authorities are working together with the other GBBCHMA authorities and have jointly commissioned a Strategic Growth Locations Study to identify the need and broad locations for additional housing growth across the West Midlands conurbation and neighbouring areas.

To frame the above, it would be sensible to articulate the relationship of the Black Country with Birmingham e.g. migration and commuting patterns.

Cont.

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Density standards

Given the emphasis in the Housing White Paper on using land more efficiently and optimising density of development, particularly areas that are well served by public transport, a review of the density standards is supported. The standards should respond to the accessibility of different locations.

The Black Country Transport Network

Birmingham City Council broadly supports the key elements of the strategy to support the spatial objectives to ensure that reliable and efficient transport networks are developed. These are in line with the objectives of Movement for Growth and complement the policies in the Birmingham Development Plan and Birmingham Connected.

Both Birmingham and the Black Country support the development of SPRINT bus rapid transit links between key strategic centres as part of the HS2 Connectivity Package. The existing Core Strategy Policy TRAN1 should be made clear that these links will be bus rapid SPRINT corridors delivered in line with the approved definition of SPRINT. Birmingham will continue to work with the Black Country and Transport for West Midlands to ensure effective delivery of these schemes.

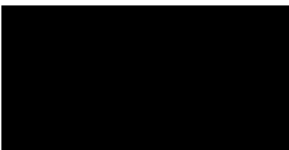
There is a need to consider the requirement for new or expanded Park & Ride provision and the plan should take account of the outcomes of Transport for the West Midlands strategic Park & Ride review.

Action to address air quality is now a key transport priority with parts of the WMCA area required by Government to develop measures to address air quality, including the Clean Air Zone being proposed in Birmingham. Policies need to be able to demonstrate that they will support improvements in air quality by reducing the overall number of trips or encourage a transition to sustainable transport and the take up of cleaner vehicles.

We support the development of the West Midlands cycle network and Birmingham will work closely with the Black Country to ensure appropriate cross boundary links as part of the development of our Local Cycling & Walking Investment Plan.

I trust that you will find these comments constructive.

Yours faithfully



Waheed Nazir
Corporate Director, Economy

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