**APPENDIX B**

# Black Country | Core Strategy

Planning for the future of the Black Country

**HOUSING** **ENVIRONMENT** **EMPLOYMENT** **TRANSPORT**

## Issues and Options report

Public consultation 3 July to 8 September 2017

Dudley | Sandwell | Walsall Council | CITY OF WOLVERHAMPTON COUNCIL

# Contents

H. Minerals
J. Growth Network Detailed Proposals
K. Monitoring and Additional Policies

## Appendices
A. Black Country Local Plan Documents
B. Black Country Housing Trajectory
C. Black Country Monitoring Summary
D. Abbreviations

## Figures

## Tables

# 1. Introduction

## Purpose and scope of the review

1.1     This is the first stage of the formal review of the Black Country Core Strategy.  The Core Strategy is a key part of the Local Plan for the Black Country Local Authorities forming the overarching planning and regeneration document for the whole of the area.  The Local Plan is a collection of statutory documents that seek to meet the development needs of the area in a way that is sustainable and reflects the vision and aspirations of local communities.  This is achieved by directing economic, social and environmental activity to the right places and ensuring it is supported by necessary infrastructure.  Delivery partners have a key role to play in the preparation of the Local Plan and as key stakeholders can ensure the necessary infrastructure will be available at the right time to meet local needs.  The Local Plan is also used to attract investment and make decisions on individual planning applications.

1.2     The Black Country covers the areas of Dudley Metropolitan Borough Council (MBC), Sandwell MBC, Walsall Council and the City of Wolverhampton Council. The four authorities worked together to produce the existing Black Country Core Strategy, which was adopted in 2011.  The existing Core Strategy provides the framework for various Site Allocation Documents and Area Action Plans (listed in Appendix A), which set out local policies and site allocations for individual authority areas.  The Core Strategy has also supported work on joint documents such as the Black Country Air Quality Supplementary Planning Document.  Two Neighbourhood Plans have also been "made" in conformity with the Core Strategy.

1.3     The existing Core Strategy covers the period 2006-2026.   From the outset there was a clear intention to review it five years after adoption, to ensure the spatial objectives and strategy are being effectively delivered and to keep the plan up-to-date.  This is in line with national planning guidance, which states that "most Local Plans are likely to require updating in whole or in part at least every five years".  Rolling the plan forward will also enable the longer term needs of the Black Country to be addressed.  In fact this extended time period is a main driver for the Review and is at the heart of the most contentious issues the Black Country is facing – both population and economy are set to continue to grow and there is a need to identify additional sites which will 'stretch' the existing Strategy.

1.4     The need for a review has been given even greater urgency by new challenges which have emerged since 2011.  The national economic situation has also changed. The existing Core Strategy was prepared as the country was emerging from the global recession of 2008, and the Black Country was recovering from a period of economic and population decline.  Looking to the future, the opening of HS2 and the extension to the Midland Metro are all likely to have a significant impact on the Black Country within the timeframe of this Plan.  There have been a number of changes to national policy and a housing shortfall has been identified in Birmingham which neighbouring authorities have a duty to consider accommodating.

1.5     Paragraph 12 of the National Planning Policy Framework (NPPF) states that there should be a clear justification for not producing a single Local Plan document for each authority or group of authorities.  The inter-connected nature of the Black Country means that production of a joint document to deal with strategic planning issues is the most sensible and productive approach.  However, the complexity and size of the area means that it would be impractical to produce a joint Local Plan covering all site allocations and policies.  It is therefore proposed to continue with

the existing two tier Local Plan document structure; although the emerging challenges mean that it may be necessary for the Core Strategy to include allocations of strategic sites which support the strategic objectives of the plan.

1.6     It is anticipated that the existing Core Strategy will generally remain fit for purpose. It has proved an effective platform to securing sustained growth, and has acted as a framework for the preparation of a suite of more detailed plans that together ensure that the majority of long term development needs can be met on sites which are already identified. Therefore it is proposed to carry out a partial review of the existing Core Strategy, looking to carry forward and 'stretch' the existing spatial strategy and to update existing policies in the light of new evidence and changes in national policy, rather than carry out a wholescale review.

1.7     In carrying out the review the NPPF is clear that early and meaningful engagement and collaboration with residents, organisations and businesses is essential. This consultation document has been prepared as the first stage in reviewing the Core Strategy and seeks to engage with all those who have an interest in shaping the future of the Black Country.

1.8     This initial consultation is about identifying the issues that the review will need to address and the broad options for how the sustainable growth of the Black Country can be achieved. The remainder of this document is in five parts:

1.9     Part Two – a summary of the existing Strategy and its effectiveness

1.10    Part Three – a summary of the strategic challenges and opportunities that the Review needs to consider

1.11    Part Four – infrastructure requirements and the impact of viability constraints

1.12    Part Five – strategic options on meeting growth needs

1.13    Part Six – a review of the existing Core Strategy policies

1.14    This will be the first of three key opportunities to help shape the review, with further consultation on a preferred spatial option and draft Plan programmed for 2018 and 2019. As this consultation focuses on reviewing the Core Strategy, it is recommended that it is read alongside a copy of the Core Strategy, which can be found at: www.blackcountrycorestrategy.dudley.gov.uk

> **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?**

## How does the review relate to other Plans?

1.15    The Core Strategy review will need to take account of other strategic plans and strategies, in particular the Black Country and West Midlands Combined Authority Strategic Economic Plans, local plans that have been adopted or are being prepared by neighbouring local authorities that contain proposals for housing or employment growth, Infrastructure Plans and important national initiatives such as the Industrial Strategy and Housing White Paper. Interconnections

within and between the Black Country and the surrounding area are being addressed through the West Midlands Transport Strategy – Movement for Growth, which will provide an overarching transport strategy framework and investment priorities for the West Midlands.

1.16    Other documents forming part of the Black Country Local Plan, including those which are at Examination stage, will also help to inform the Core Strategy review. Good progress has been made with these documents and it is anticipated that the full suite will be in place by the end of 2017. The detailed evidence which supports these plans, the allocations within them and up-to-date monitoring data together provide essential feedback to determine how far the Core Strategy has achieved its goals and if changes are required when rolling the Plan forward.

## Why is 2036 the proposed end date?

1.17    Local Plans are required to have a 15 year time horizon from the anticipated date of adoption, in line with the NPPF. It is anticipated that the review will be completed by 2021; therefore the end date for the Core Strategy will be 2036, with a base date of 2014 to reflect the start date of the most recent household projections.

## Will all existing policies and proposals be reviewed?

1.18    It is anticipated that the existing Vision, the spatial objectives and strategy will largely be carried forward into the review Plan but it is recognised that there is a need to review all existing policies and proposals, to assess where there has been a significant change in circumstances since they were adopted or where the evidence base needs updating. Not all of the policies and proposals will need significant change, as some may still remain up to date and relevant. A review of the existing Core Strategy policies and proposals and a summary of proposed changes can be found in Part 6.

## How could it affect me?

1.19    The existing Core Strategy is focused on urban regeneration and aims to accommodate development needs entirely within the urban area. Urban regeneration will remain the focus of the new Core Strategy; however it will not be possible to accommodate all future development needs within the urban area. Therefore, an examination of the potential for additional development on land outside the existing urban area, all of which within the areas of the four authorities is currently green belt, will need to take place as part of the Core Strategy review. It is important to ensure that any release of green belt sites for development does not take place at the expense of urban regeneration. There are current and emerging significant funding opportunities available for assembly and remediation of brownfield land which are starting to bring forward sites for development. It is important that the new Core Strategy ensures these sites are developed at pace, irrespective of any decision made about sites outside the urban area, as these will deliver the majority of development needed up to 2036.

1.20    Given the levels of growth to be planned for, care is needed to safeguard environmental and historic assets and to ensure enough services, such as open space, shops, schools and healthcare, are provided.

1.21    It is therefore likely that the review will be of interest to a wide range of residents, businesses, groups and organisations living or working in the Black Country, and the Black Country

authorities would encourage all those with an interest to comment on the matters raised in this document.

## The Consultation and Call for Sites Process

1.22    The scope of the review, the issues it raises and the broad options for dealing with them, are the subjects of the current consultation.  The consultation will run for ten weeks from 3 July to 8 September 2017. Please visit the Core Strategy website for details: www.blackcountrycorestrategy.dudley.gov.uk.

1.23    Throughout the document a series of questions are posed on key points.  The online version of the document is interactive and allows you to respond to the questions as you make your way through the different sections.  A response form is also available which can be completed by hand if you prefer.  The Issues and Options consultation leaflet also includes a short list of less detailed questions which can be responded to online or by hand.

1.24    You do not need to answer all of the questions and responses are welcome on issues you think have been missed and that should be addressed through this review.  It would help if you could provide concise but comprehensive responses and where possible provide evidence to support your response.

1.25    A "Call for Sites" also forms part of this consultation and a separate form is provided for this.  The Call for Sites process is running in parallel with the Issues and Options consultation and is focussed on identifying sites to accommodate housing and employment land needs.  All sites that are submitted during the consultation period will be considered as part of the evidence work for the Preferred Spatial Option stage of the plan.  The submission of a site does not necessarily mean that it will be considered as suitable for development and sites may be discounted through the site review process.

1.26    Further information can be provided on the sites at a later stage, if necessary, but respondents are encouraged to provide as much information as they can now.  It is important that sites are submitted during the consultation period in order to inform the evidence work, however should individuals wish to submit sites after the ten week period they should get in touch to discuss what further evidence they may need to provide for their site to be considered. All site boundaries and site information submitted as part of the Call for Sites process will be published in due course.

1.27    Call for Sites submissions should only be made for sites within the Black Country or sites within neighbouring authorities but adjoining the Black Country urban area.  However, submissions will be accepted for any site within a neighbouring authority which could potentially form part of a larger development which would adjoin the Black Country urban area, to allow discussions to take place with adjoining authorities.  If your submission relates to a site which stretches beyond the Black Country into a neighbouring authority then this should be clearly stated and evidence of submissions to that neighbouring authority provided.

**How your personal information will be used**

1.28    The information you provide will be used to help prepare the Core Strategy review and will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the process.  Please note that the local authorities are obliged to make representations available for public inspection.  This means that, with the exception of telephone numbers, email addresses and signatures, your comments and other personal details that you provide will be publicly available.

## Next steps

1.29    Following the Issues and Options consultation, the consultation responses and Call for Sites information received will be considered and used, along with other evidence, to assist the four Councils in producing a Preferred Spatial Option Report that will show various ways in which growth needs can be met, including specific development sites.  It is anticipated that it will be possible to identify a Preferred Spatial Option as part of this process.  This Preferred Spatial Option will be the subject of a comprehensive consultation and the feedback will be used to produce a Draft Plan.  The timetable for the Core Strategy review is set out below:

   July / September 2017 - Issues and Options Consultation
   September 2018 – Preferred Spatial Option Consultation
   September 2019: Draft Plan Consultation
   February 2020 – Publication Plan Consultation
   June 2020 – Submission of Core Strategy
   Autumn 2021 – Adoption of Core Strategy

# 2. The Black Country Today – The Existing Strategy

## The Black Country Today

2.1     The Black Country forms a distinctive sub-region on the western side of the West Midlands conurbation.  It has a unique economic history, settlement form and topography and is very much a product of its industrial past.  The four local authorities have a shared set of social, economic and environmental challenges and have found it effective to tackle strategic issues on a cross-boundary basis.  The authorities have worked closely together for 14 years to establish a clear and shared set of ambitions and directions of travel, expressed in an agreed economic and spatial strategy.  This joint working has strengthened and deepened over time – moving from establishing a 30 year Vision in 2003, to adopting a joint Core Strategy in 2011, to securing funding through the Black Country LEP and the West Midlands Combined Authority in 2017 to deliver priority projects.

     a.   **Figure 1      The      Location      of      the      Black      Country**



### The Strategy

2.2     The Black Country is a significant area with a large and diverse population of 1.1 million, and faces a number of challenges.  The Core Strategy ambitiously aimed to meet these challenges head on - stemming a declining population by regenerating the urban core and delivering housing growth; revitalising declining industrial areas and creating modern quality employment land; strengthening centres; creating stronger public transport networks; and transforming the environment and image of the Black Country.

2.3     The Core Strategy set out a vision based on three major directions of change:

     a.  Sustainable Communities;

     b.  Environmental Transformation; and

c. Economic Prosperity, which reflect the three dimensions of sustainable development set out in the NPPF, and five sustainability principles: facing up to climate change; sustainable development; social inclusion; putting brownfield first; and a comprehensive approach to development.

2.4 The Key Diagram below illustrates the Spatial Strategy for the Black Country. The four Strategic Centres and sixteen Regeneration Corridors together make up a Growth Network where growth, regeneration and land use change is to be concentrated over the plan period – delivering two thirds of new housing and over 90% of new employment land, retail and offices. The Growth Network is served by an extensive transport system and therefore provides the most sustainable locations for economic and housing growth across the Black Country although significant improvements are still required to improve connectivity and accessibility. The growth network covers the parts of the urban area with the best access to infrastructure and services, and those areas most in need of regeneration.

a. Figure 2        Black Country Core Strategy Key Diagram
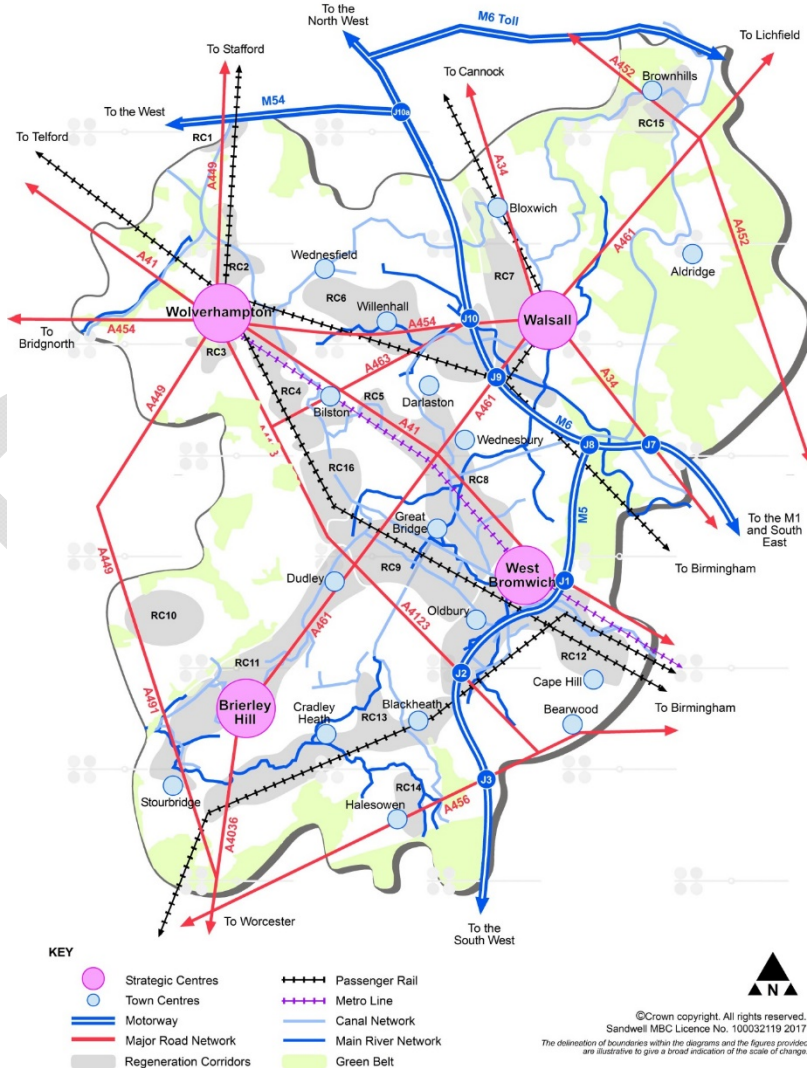


b.

## Delivery

2.5     Local Plans have now been prepared to allocate the sites needed to meet the targets in the Core Strategy. The majority of land required to meet development needs up to 2026 is focused within the growth network, although the level of concentration is less than anticipated. One reason for this is that more windfall sites have come forward than expected outside the Growth Network e.g. through disposal of surplus public land. However, another reason is that there is not as much surplus employment land suitable for housing as anticipated. This is partly because the economy has strengthened and local firms are more robust than expected and partly because sites are more affected by constraints than expected.

2.6     The existing Core Strategy was prepared against the backdrop of a global economic recession which significantly affected the Black Country economy and slowed the delivery of regeneration for a number of years. However, since 2011, development rates and confidence have significantly increased, supported by public sector investment and the certainty provided by strong local plans - and the Core Strategy policies have started to take effect.

2.7     The following section summarises delivery of key elements of the Strategy in relation to employment, housing and transportation infrastructure.

**Employment**

**Figure 3          Employment Land Delivery 2011-17**
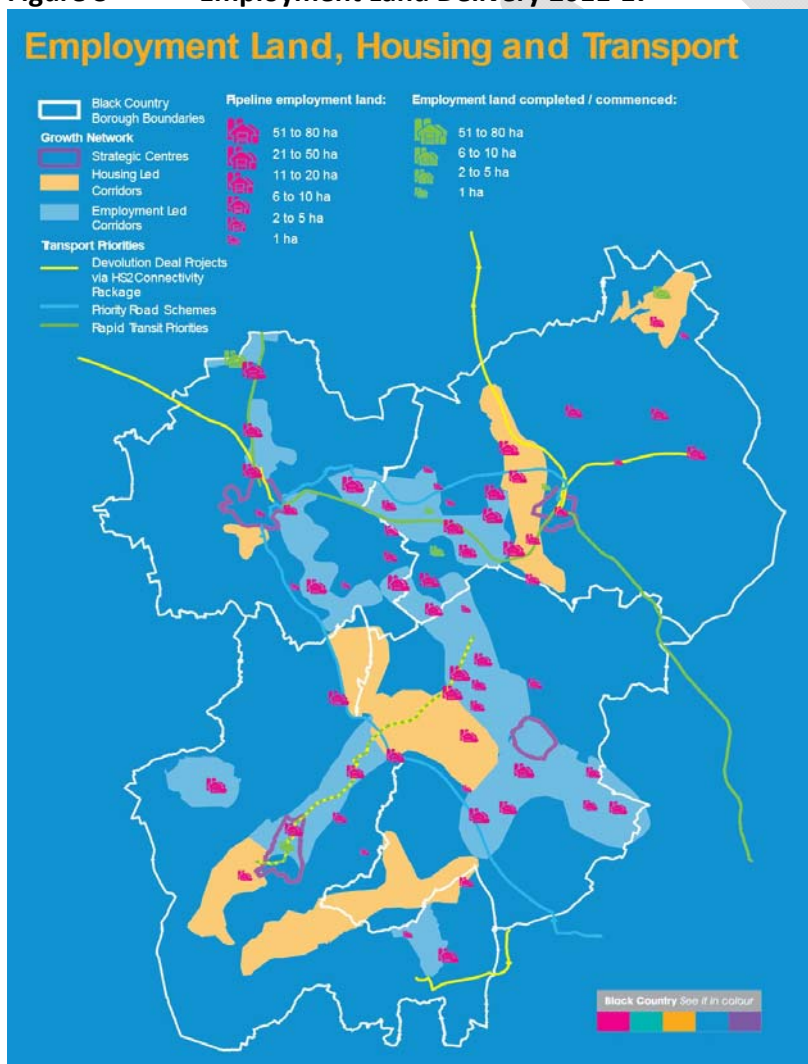
2.8    Map 2 above illustrates the delivery of the Core Strategy so far in relation to key employment sites. This shows both completed developments and projects in the pipeline – and the extent to which the Plan has been successful in steering development proposals to within the growth network. The Black Country has secured notable successes in delivering high quality employment land, including the i54 business park which has attracted international companies such as JLR and Moog. Significant improvements have been made to regenerate key urban centres such as West Bromwich's New Square, retail, office and housing development in Walsall Town Centre and Wolverhampton's new transport interchange, Mander Centre refurbishment and new Grade A offices at the railway station.

**Housing**

**Figure 4        Housing Delivery 2011-17**
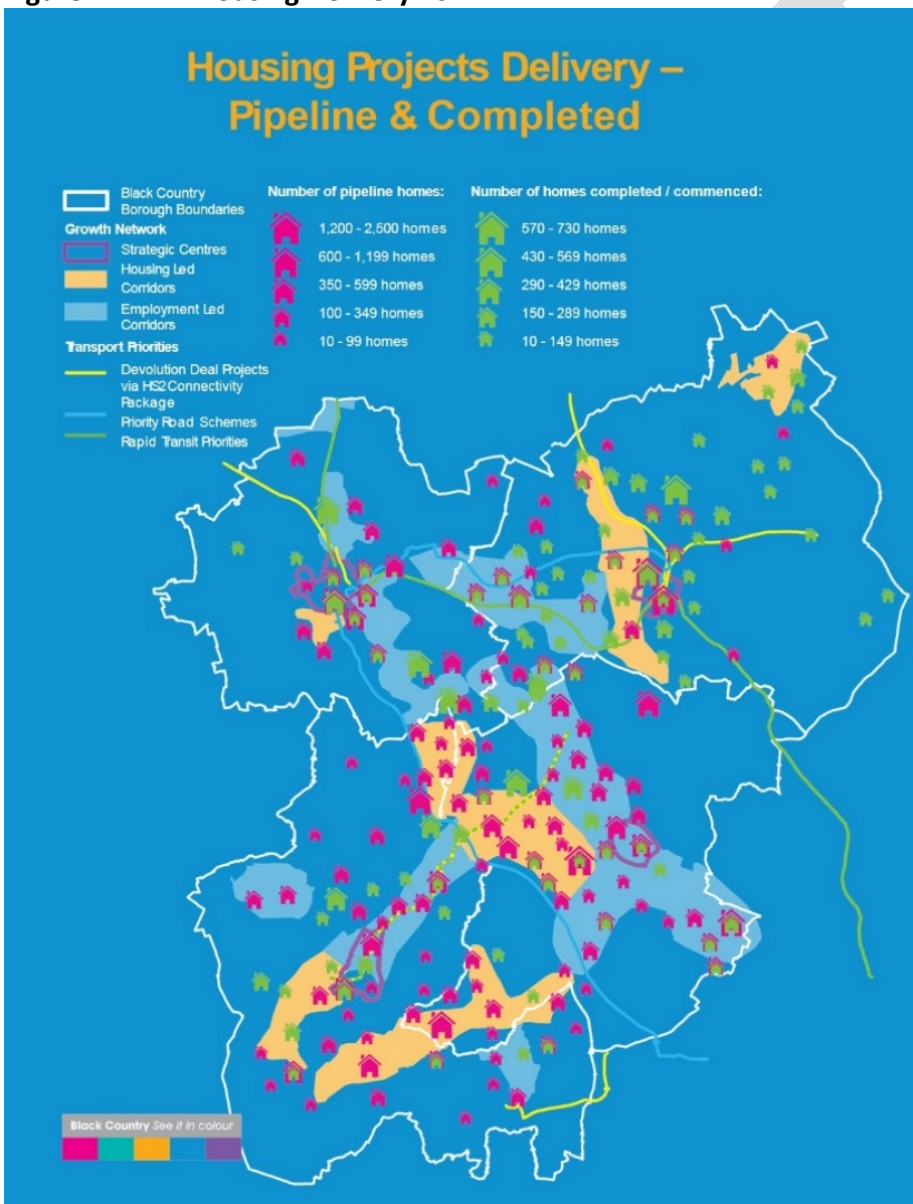


2.9    As in most parts of the country, the recession had a marked effect on the rate of house building across the Black Country and reduced the appetite for higher density schemes. The housing trajectory, measured against existing Core Strategy targets, (Appendix B) reflects this dip, which

has resulted in the Black Country currently being 3,000 homes behind the Core Strategy target. However, up-to-date SHLAAs demonstrate that the sub-region should be on target again by 2017/18 and that an adequate supply of housing land is available to comfortably meet the current 2026 target.

a.      This does conceal a delivery challenge which is also illustrated in Map 3.  There is a large pipeline of major housing sites, concentrated within the Growth Network, which have been successfully allocated through Local Plans.  However, many of these sites have multiple constraints and financial assistance will be needed to bring them forward.

b.      These sites include 300 ha of occupied employment land which has been allocated for housing. This approach brings issues of viability due to the costs of land assembly, business relocation and land remediation.   Significant amounts of external funding are now available through the Black Country LEP and the West Midlands Combined Authority to help tackle these issues.  However, this is not sufficient to cover the costs of compulsory purchase, which may be necessary on many sites to ensure delivery by 2026 and would significantly increase gap funding costs to around £1.5m per ha.  Looking at past trends, 300 ha of employment land is the quantum that should become vacant and available for development through the process of natural wastage and building obsolescence between 2016 and 2036, the end of the new Plan period.  Therefore, if the delivery period for these sites was extended from 2026 to 2036, compulsory purchase should not be required.

**Transport Infrastructure**

2.10    Many of the transport priority improvements identified in the Core Strategy have been delivered or are committed for delivery in the short term:

Darlaston SDA access scheme completed

I54 motorway access in place
Metro Line 1 Improvements complete
Burnt Tree Junction improvement delivered
Junction 9 of M6 improvement works complete
Active Traffic Management and Hard Shoulder Running on M6 in Black Country complete
Red Routes package 1 completed
Established West Midlands Rail Ltd to increase local influence over rail passenger services
Wolverhampton Interchange (Bus Station) completed
Wolverhampton Interchange (train station) and Metro Strategic Centre Extension now committed
Midland Metro between Wednesbury and Merry Hill / Brierley Hill committed.

2.11    In summary, the Core Strategy Spatial Strategy with its focus on the Growth Network has proved to be effective.  It serves the Black Country well to take into the review and many of the challenges that faced the sub-region in 2011 remain.  The next Part of the Report sets out the new challenges and opportunities which the review needs to respond to.

# 3. The Strategic Challenges and Opportunities

3.1    This part of the Report summarises the key strategic challenges and opportunities that have arisen since the Core Strategy was adopted in 2011.  These issues are the main reasons why a review is needed and they help explain the degree to which the existing Spatial strategy remains up to date and fit for purpose.

The strategic challenges and opportunities are expressed as a set of nine key issues:
Updating the evidence base
Meeting the housing needs of a growing population
Supporting a resurgent economy
Supporting strong and competitive centres
Protecting and enhancing the environment
Reviewing the role and extent of the green belt
Keeping the Black Country connected
Providing infrastructure to support growth
Working effectively with neighbours

## Key Issue 1 – Updating the evidence base

3.2    The Review must be based on up to date and robust evidence.  The Core Strategy was adopted five years ago, and the evidence on which it was based is older.  Some of this evidence will be relevant to this review and can continue to be relied upon to support policies that can be carried forward.  However other parts of the evidence base are out-of-date or have been superseded by changes in circumstance or national policy.

3.3    A range of detailed evidence will be used which has been prepared to support the preparation of Local Plan documents and completed following the adoption of the Core Strategy including viability evidence and delivery plans.   Up-to-date Strategic Housing Land Availability Assessments (SHLAAs) and Annual Monitoring Reports are also available for each authority.

3.4    To make sure land is used efficiently without harming important environmental and other assets, or placing existing or future residents at risk, it is important to map assets and constraints that affect development. These include factors such as flood risk, nature conservation designations and heritage assets.

3.5    The key pieces of evidence considered necessary to support the review are listed in Table 1, with the sequencing supporting the overall review programme.  Some of these studies will be completed in stages and it may also be necessary to refresh elements in the light of new information and specific issues raised through the consultations and Plan preparation stages.

3.6    Key strategic evidence has already been completed to inform this consultation report, including the Strategic Housing Market Assessment (SHMA), which establishes the local housing need for the area, and Stage 1 of the Economic Development Needs Assessment (EDNA), which establishes the supply and demand for employment land.

3.7    All    current    evidence    is    available    through    the    Core    Strategy    website: www.blackcountrycorestrategy.dudley.gov.uk and the key findings are summarised in the context of the Key Issues they relate to below.

**Table 1       Evidence Base for the Black Country Core Strategy Review**

| Issue | Evidence | Programming | Status |
|---|---|---|---|
| Housing | Greater Birmingham and Solihull LEP / Black Country Authorities Strategic Housing Needs Study (SHNS) Stage 3 Report (PBA) | To inform Issues and Options Report | Completed August 2015 |
| | Strategic Housing Market Assessment for Black Country and South Staffordshire including Gypsy and Traveller needs (PBA) | To inform Issues and Options Report | Completed February 2017 |
| | Strategic Housing Land Availability Assessments for Dudley, Sandwell, Walsall and Wolverhampton (Local authorities) | To inform Issues and Options Report but to be updated as the Plan progresses. | Completed 2016/17 |
| | Housing Background Report (Local authorities) | To inform Issues and Options Report | Completed May 2017 |
| Employment | West Midlands Strategic Employment Sites Study (PBA/JLL) | To inform Issues and Options Report | Completed 2015 |
| | Black Country and South Staffordshire sub-regional High Quality Employment Land Study (WECD) | To inform Issues and Options Report | Completed 2015 |
| | Black Country and Southern Staffordshire Regional Logistics Sites Study (URS) | To inform Issues and Options Report | Completed 2013 |
| | Black Country Strategic Economic Plan (SEP) | To inform Issues and Options Report | Completed 2014 / Draft Refresh 2017 |
| | West Midlands Combined Authority Strategic Economic Plan (SEP) | To inform Issues and Options Report | Completed 2016 |
| | Black Country Economic Development Needs Assessment (WECD) | Stage 1 to inform Issues and Options Report. Stage 2 to inform Preferred Spatial Option Report | Stage 1 Completed February 2017 |
| Strategic Growth / Green Belt | Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study | To inform Black Country and South Staffordshire Green Belt Study and Preferred Spatial Option Report | Commenced March 2017 To be completed September 2017 |
| | Black Country Green Belt Review (see Key Issue 6) | To inform Preferred Spatial Option Report | Scoping underway To be completed mid 2018 |
| Town Centres | Retail Capacity Study and town centre uses study | To inform Draft Plan | Scoping underway |
| The Natural | Ecological Network Study | To inform Preferred | Scoping |

| Issue | Evidence | Programming | Status |
|---|---|---|---|
| Environment | | Spatial Option Report | underway |
| | Strategic Mapping of the Black Country's Natural Environment | To inform Preferred Spatial Option Report | Scoping underway |
| Infrastructure | Flood Risk / Water Infrastructure Study | To inform Preferred Spatial Option Report | Scoping underway |
| | Infrastructure Studies | Stage 1 to inform Preferred Spatial Option Report and Stage 2 to inform Draft Plan | Scoping underway |
| Transport | West Midlands Strategic Transport Plan: Movement for Growth (WMCA) | To inform Preferred Spatial Option Report | Completed 2016 |
| | Transport Impacts and Accessibility Planning Study | Stage 1 to inform Preferred Spatial Option Report and Stage 2 to inform Draft Plan | Scoping underway |
| Waste | Waste Study | To inform Publication Plan | Scoping underway |
| Delivery | Delivery Studies | Stage 1 to inform Preferred Spatial Option Report and Stage 2 to inform Draft Plan | Scoping underway |
| Viability | Viability Studies | Stage 1 to inform Preferred Spatial Option Report and Stage 2 to inform Draft Plan | Scoping underway |
| General | Assets and Constraints | To inform Preferred Spatial Option Report | Scoping underway |
| Sustainability Appraisal / Habitat Regulations Assessment | Sustainability Appraisal Scoping Report (Lepus) | To inform Issues and Options Report | Completed February 2017 |
| | Sustainability Appraisal of Issues and Options Report (Lepus) | To inform Issues and Options Report | Completed May 2017 |
| | Cannock Chase SAC Partnership Memorandum of Understanding | To inform Issues and Options Report | Agreed May 2016 |

3.8    Published alongside this consultation report is a Sustainability Appraisal scoping report and assessment prepared to inform and support this stage of the plan making process. Sustainability Appraisal reports will be prepared to inform each stage of the review process. Under the Conservation of Habitats and Species Regulations 2010 ('Habitat Regulations') an assessment screening report will be prepared at Preferred Spatial Option stage.

**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.**

## Key Issue 2 – Meeting the housing needs of a growing population

3.9     One of the most important objectives of any local plan is to ensure that it identifies sufficient land for housing to meet the needs of people who are likely to live in the area over the period of the plan. These include the children of residents already in the area who will grow up and want to form new households, and people who will move into the area because of work, study or other reasons. A key factor in household growth is that people are on average living longer than previous generations, so the existing housing stock is not being "freed up" at the same rate as new households are forming.

3.10    Housing need is assessed at the level of the Housing Market Area (HMA). This is the area within which a high proportion of home moves occur and usually covers several local authorities. There is often an overlap between adjacent HMAs, but for plan preparation purposes the HMA usually follows local authority boundaries. The Black Country forms part of the wider Greater Birmingham and Black Country Housing Market Area (HMA).   The examination of the Birmingham Development Plan, which has now been adopted, confirmed that there is a shortfall of 38,000 homes arising from Birmingham's needs to 2031 that cannot be accommodated within the City even allowing for the proposals in the Plan to use land currently in the City's green belt.

**Figure 5        The Greater Birmingham and Black Country Housing Market Area**
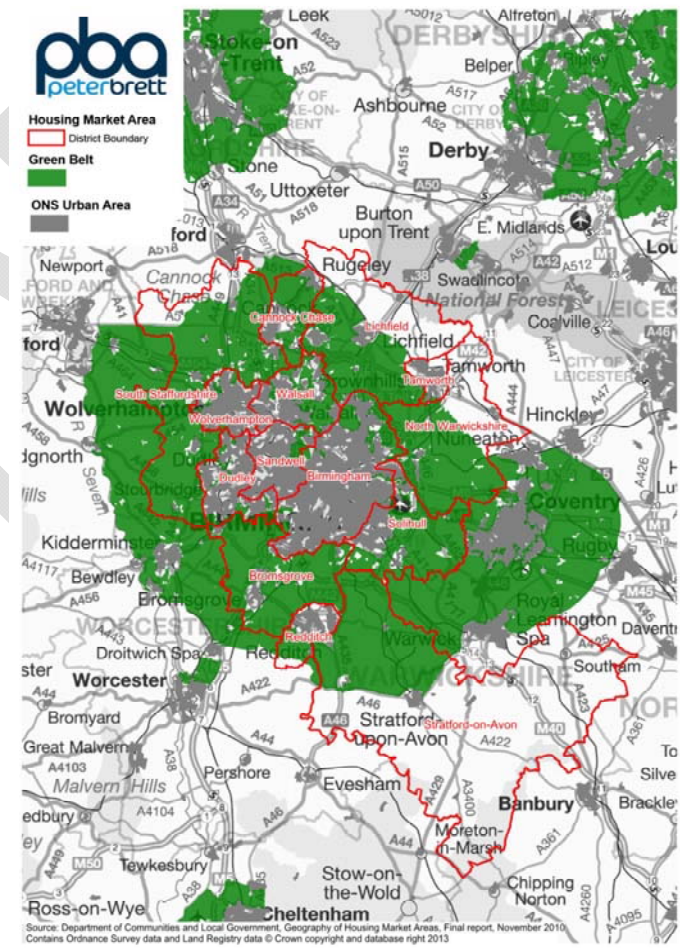
3.11   A Greater Birmingham and Black Country Strategic Housing Needs Study was completed in 2015 to assess the housing need for the wider HMA and consider scenarios for distributing the housing shortfall.  The study concluded that the supply of brownfield land across the HMA is insufficient to accommodate this shortfall, and that the majority of that shortfall will have to be met on greenfield sites, including green belt land outside Birmingham's administrative area. Options, including urban extensions and growth around railway stations, are identified as possible ways of addressing the shortfall.  The study recognises that the time needed to review plans and allocate and deliver sites means that it may not be possible to meet the shortfall in full by 2031.  The duty to cooperate offers a mechanism to explore new housing provision beyond the HMA where there are clear migration or commuting links.

3.12   Stepping back from this wider context, the starting point for the Core Strategy review is to assess local housing need arising within the Black Country over the Plan period (2014-36).  It has been decided to assess the local needs of the Black Country and South Staffordshire jointly, as this area forms a logical sub-market of the HMA.  Therefore, a Strategic Housing Market Assessment (SHMA) - a more detailed study making use of the most up-to-date population and household projections - has been prepared for the Black Country and South Staffordshire during 2016-17.

3.13   The SHMA concludes that **the local housing need or "Objectively Assessed Housing Need" (OAN) for the Black Country over the period 2014-36 is 78,190 homes**.  In order to be compatible with the SHNS, which covers the period 2011-31, the OAN also includes an allowance for a notional "backlog" arising over the period 2011-14 where the SHNS suggests that the annual need for housing was greater than that planned for in the existing Core Strategy.  The SHMA OAN figure will be used as the basis for deriving the Core Strategy review housing target.  The SHMA may be updated during the review as and when new Government projections and guidance become available and housing supply information changes.

3.14   Work is ongoing to confirm how much new housing can be provided from various sources to help meet the need.  A step by step approach has been taken – firstly understanding what has already been built, has planning permission or is identified for development in Local Plans and the capacity of small 'windfall' sites within the urban area.  This provides the housing capacity of the existing Core Strategy up to 2026, which is detailed in existing SHLAA reports and summarised in the Housing Background Report.  The second step is to assess what further capacity exists over the Core Strategy review period up to 2036, which includes identified sites and small and large windfall sites, which is also summarised in the Housing Background Report.  This information is presented in Figure 6.

## Figure 6  Black Country
## Housing Need and Supply 2014-36

■ Housing Completions 2014-16
■ Existing housing supply in urban area
■ Estimated further housing supply in urban area
■ Local Shortfall
■ To test for HMA shortfall

3000

21670

8335

42507

5678

No. homes
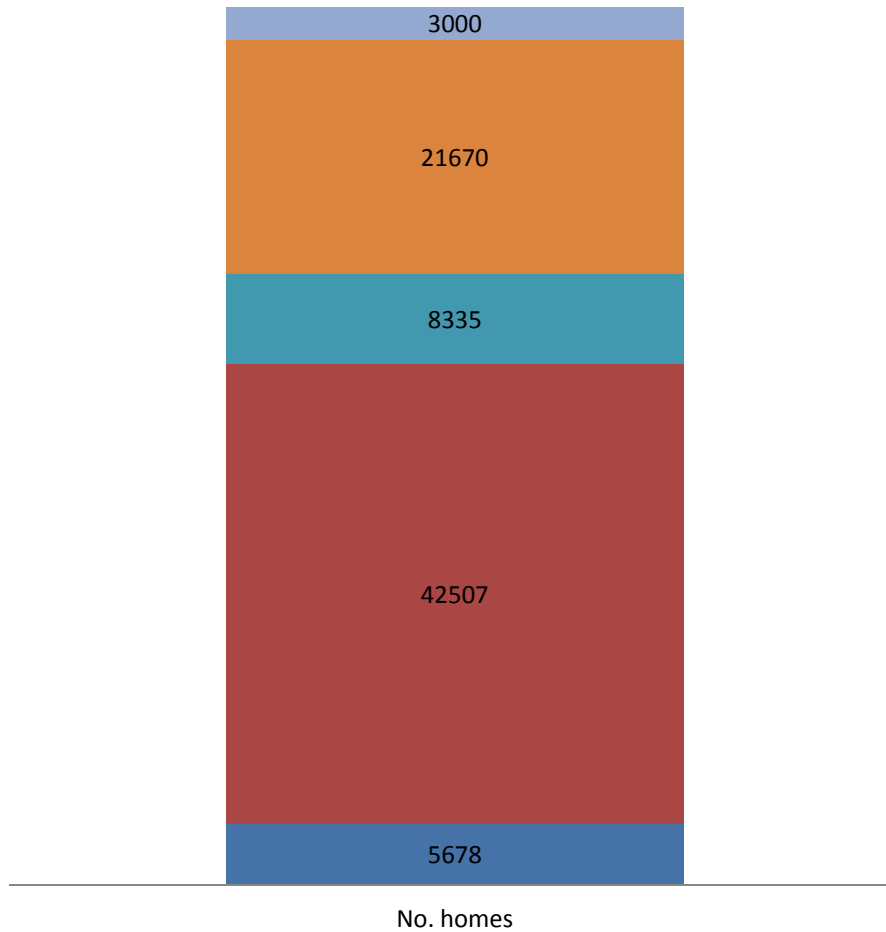
3.15    Figure 6 shows that completions and SHLAA housing supply can deliver 48,185 homes, leaving a requirement for an additional 30,005 homes to accommodate over the Plan period. Identified sites and "windfall" sites have the potential to deliver around 8,335 homes during 2026-36, reducing the 'gap' to around 21,670 homes.  There may be potential to increase high density housing allocations in some Strategic and Town Centres and to release limited areas of surplus open space for housing in some areas.  These sources of supply have not yet been fully quantified and further work will take place during 2017/18 to firm up estimates. However, these sources are unlikely to generate more than a few thousand homes in total, and potentially less.

3.16    A key source of housing supply under the existing spatial strategy is the release of surplus employment land for housing.  Local Plans have been successful in identifying and allocating

300 ha of such sites, with capacity to deliver around 10,400 homes during 2016-26, subject to overcoming delivery constraints (see Part 2 – Delivery).  A key decision to be made through the review (as set out in Part 4) is whether it is possible and desirable to continue to make such allocations up to 2036, in light of changing employment land needs (see Key Issue 3) and delivery and viability issues.  At this stage it is anticipated that, if this option were pursued, it would be extremely challenging to exceed past levels of allocations, 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.

3.17    **Therefore, a 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**. Part 4 sets out how it is proposed to carry out a search for new sites, including the proposed approach to reviewing the green belt boundary (see Key Issue 6).

3.18    At the HMA level, a joint approach to addressing the HMA-wide shortfall in housing land supply is being developed and a HMA Strategic Growth Study is underway.  The Core Strategy review process will reflect the findings of this study and any agreements reached as other local plan reviews progress. The Black Country have committed to test the accommodation of an extra 3,000 homes up to 2031 beyond local need, to help address the shortfall in the wider HMA.  **This produces a total requirement for land to accommodate 25,155 new homes**.

3.19    All of these figures will be tested on an ongoing basis as part of the evidence gathering process during the review and so may be subject to change.

> **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**

## Key Issue 3 – Supporting a resurgent economy

3.20    The NPPF requires the planning system to support sustainable economic growth to create jobs and prosperity, meet global competition and a low carbon future and requires local authorities to plan proactively to meet the development needs of businesses and support a modern economy.

3.21    The Core Strategy review will set out a clear vision and strategy to reflect these aims and make provision for local and inward investment to meet need over the longer Plan period.

3.22    An Economic Development Needs Assessment (EDNA) has been prepared for the Black Country during 2016-17.  This builds upon and updates a number of sub-regional employment land studies completed since the adoption of the Core Strategy in 2011 - the West Midlands Strategic Employment Sites Study, the Black Country and South Staffordshire sub-regional High Quality Employment Land Study and the Black Country and Southern Staffordshire Regional Logistics Sites Study.

3.23    The EDNA provides an up to date assessment of employment land requirements over the review period, the suitability of the existing Core Strategy and the associated policy approach.  The work identifies a number of growth scenarios based on a range of potential

economic outcomes.  For all scenarios the EDNA assumes that the 300 ha of occupied employment land already allocated for housing through Local Plans is lost to the employment land supply over the Plan period.

3.24  **In order to accommodate the level of growth associated with the most likely scenario, the EDNA recommends that the review should plan for up to 800 ha of additional land to meet the needs of the Black Country for the period 2014-36** within the B1(b), B1(c), B2, B8 use classes and other ancillary uses normally located within employment areas.

3.25  This figure of 800 ha is recommended in the EDNA to be the most appropriate as it represents around 550 ha of land as a basic requirement, informed by past trends, for the Black Country industrial sector to keep functioning, plus approximately 250 hectares of land for growth in the industrial sector, to reflect the employment forecasts associated with the economic growth aspirations of the Black Country SEP in particular i.e. a "past trend plus some growth" scenario.

3.26  In the first instance, need should be accommodated within the existing Growth Network and other parts of the urban area.  It is anticipated that 394 ha of land is either currently available or is likely to come forward within the Black Country itself, including opportunities to intensify existing employment areas.  A further 90-170 ha of land in South Staffordshire (including the proposed West Midlands Interchange) has the potential to contribute towards meeting Black Country needs.

3.27  **The 'gap' between anticipated need and existing and future supply is therefore up to some 300 ha.**  This is a Black Country wide requirement, and the review will need to guide the distribution and phasing of this new supply – for example, should the success of the M54 corridor on the northern edge of the Black Country, in its development as a nationally significant investment location, be built upon and / or should high quality development land in other accessible locations in the south of the Black Country be brought forward?

3.28  The review should provide for a portfolio of employment sites capable of meeting a wide variety of investment needs.  These include needs for local and lower quality activities which provide jobs and are important to the functioning of industrial areas.  However, it is evident that there is a particular shortage of large and accessible high quality investment opportunities available in the short term.  There remains a specific need for large scale, rail-based logistics provision to serve the Black Country and in the absence of any suitably large sites within the administrative area, the proposed West Midlands Interchange located at Four Ashes in South Staffordshire has the potential to satisfy some or most of this need. Discussions with South Staffordshire Council on this issue are on going and will continue under Duty to Cooperate work.

3.29  The EDNA suggests that the Core Strategy should continue to safeguard a wide range of sustainable local employment areas and promote the recycling of brownfield sites within them.  However, looking forward over the review period, there may be a limited number of existing employment areas which are unlikely to be 'fit for purpose' and could be considered for redevelopment to alternative uses, especially housing.  These redundant employment areas could contribute towards meeting housing land requirements, subject to overcoming

significant viability issues.  This potential source of housing supply is considered under the Strategic Options set out in Part 4.

## Key Issue 4 – Supporting strong and competitive centres

3.30    The existing Core Strategy seeks to maintain strong and competitive strategic centres that will be the focus for retail, commercial and other development and sets out the amount of retail and office development planned for up to 2026.

3.31    The primary evidence base informing the Core Strategy's policy framework in respect of retail and centres is set out in the Black Country Centres Study undertaken by GVA Grimley and published in November 2009.  The Study includes capacity projections for convenience and comparison good floorspace based on survey zones and uses population forecasts and expenditure growth projections.  The Study identified limited capacity over and above what was then being planned for in centres, and no quantitative or qualitative need to plan for further out-of-centre retail development.  This is because the Strategy was predicated on redirecting capacity generated out-of-centre towards centres to support and reinforce their vitality and viability.

3.32    The NPPF requires positive planning policies to promote competitive town centre environments and to set out policies for the management and growth of centres over the plan period.  New evidence on retail will be commissioned to inform the rolling level of floorspace that will be needed to be planned for across the Black Country and in particular the Strategic Centres.

3.33    The Core Strategy currently sets ambitious targets for office floorspace and delivery against these targets has been a challenge.  New evidence will establish the demand for offices in the Strategic Centres and the delivery issues around attracting offices into centres.  Further evidence will also be needed on other centres uses such as leisure in the recognition of the crucial role these uses play in supporting the vitality and viability of centres.

## Key Issue 5 – Protecting and enhancing the environment

3.34    The NPPF requires the planning system to protect, contribute to and enhance the environment while providing for the nations development needs. The environment is a key consideration in the NPPF's pursuit of sustainable development.

3.35    The Core Strategy Review will set out a vision and strategy for the protection and enhancement of the Black Country environment and make provision for environmental infrastructure required to support growth across the Black Country. To assist with achieving these aims new and updated evidence regarding the environment will be commissioned as the review progresses and in response to the findings of the Options consultation.    This is anticipated to include an Ecological Network Study, Strategic Mapping of the Black Country's Natural Environment and Flood Risk / Water Infrastructure Study.

3.36    Under the 'Habitats Regulations', spatial plans are required to be assessed for their impact on protected sites that are designated as being of European Importance.  Some of the most important of these sites can be affected by developments over a wide area and it is possible that changes in the Black Country might affect the Severn and Humber Estuaries, which – as well as being protected under the international Ramsar Convention - are designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).  There are also a number of other SACs within and outside the Black Country that could be affected by the proposals in the Core Strategy review.

3.37    The Black Country authorities have worked closely with the Cannock Chase SAC Partnership in recent years.  The Partnership, which includes local authorities affected by the SAC who are advised by Natural England, aims to ensure that the requirements of the Habitats Regulations are met in relation to Cannock Chase SAC.  The key objective of the SAC Partnership is to secure appropriate mitigation for the cumulative impact of local plan policies and proposals, and individual planning applications, on the integrity of Cannock Chase SAC.  The evidence suggests that increasing numbers of visits are putting pressure on the habitat for which the site is designated and that housing growth might increase the numbers of visits.

3.38    The Partnership has agreed a Memorandum of Understanding (MoU).  This is based on the view that there is a 15 km 'zone of influence' around the SAC and seeks to establish a programme of measures to mitigate for the impact of new homes within this area, together with a system for collecting developer contributions from housing developments within 8km of the SAC to pay for this programme.  A very small part of Walsall Council falls within the 8km zone and the northern parts of Wolverhampton and Walsall fall within the 15km zone.

3.39    The SAC Partnership is in the process of commissioning new evidence to inform Local Plan reviews.  Key aims are to determine how further housing growth is likely to impact on the integrity of the SAC and whether the current programme of mitigation measures is sufficient to mitigate for this growth.  A HRA screening exercise, drawing on the evidence in respect of Cannock Chase SAC and other European sites that might be affected by the Plan, will be undertaken for the Preferred Spatial Option stage of the Core Strategy review.


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

3.40    The green belt is central to the Strategy by providing areas of open land close to where people live and focussing development within the urban area by restricting urban sprawl.  The NPPF states that the boundaries of the green belt should only be altered in 'exceptional circumstances', through the preparation or review of the Local Plan. The need to accommodate unmet housing needs can contribute towards establishing a case for exceptional circumstances and elsewhere in the region it has been recognised that this threshold has been met.

3.41    The existing Core Strategy concluded that all development needs to 2026 could be met within the existing urban area and so it did not need to be supported by a green belt review.  Indeed, there has been no strategic green belt review in the Black Country since the designation of the existing green belt in the late 1970s.

3.42    Newer evidence summarised in Key Issues 2 and 3 above suggests that, for the period to be covered by the Core Strategy review, **there will be a significant housing need within the Black**

**Country and the wider HMA, and a need for employment land, which will require the identification of new sites on land outside the urban area that is not currently proposed for development**. Within the four Black Country authorities and immediate neighbours nearly all such land is currently green belt and the Review of the Core Strategy will therefore need to explore and identify the potential to accommodate such growth in these areas.

3.43   The current Core Strategy identifies broad locations for development but does not allocate specific sites.   Such allocation is left to site allocation documents and area action plans prepared by individual authorities.  However, given the strategic importance of the matter to the delivery of the plan, it is considered that a formal review of the Black Country green belt and any release of sites from the green belt, including the allocation of specific sites for development by 2036, should be carried out through the Core Strategy review.

3.44   The examination of the Black Country Green Belt sits in the context of wider work. The Greater Birmingham and Black Country Housing Market Area (HMA) authorities are working together and have commissioned a Strategic Growth Study to identify the need and locations for additional housing growth across the West Midlands conurbation and neighbouring areas (see Key Issue 2).

3.45   Once this work has been concluded which is likely to be September 2017, the findings will inform and provide the basis for a more detailed green belt review for the Black Country as part of the Core Strategy Review.

3.46   The two studies together will therefore provide a robust and thorough examination of the green belt surrounding the Black Country to assess and identify the potential to release sites from the green belt, alongside growth within the urban area, to meet the projected needs identified for housing and employment growth up to 2036.

3.47   This Black Country Green Belt Review will be carried out in conjunction with South Staffordshire Council due to the fact that a large proportion of the Black Country urban fringe extends into South Staffordshire and there are also strong housing market and economic links between the Black Country and South Staffordshire.  This consistency of approach will enable the Black Country to work collaboratively with South Staffordshire on cross-boundary issues, through parallel plan reviews (see Key Issue 9 – Working effectively with neighbours).

3.48   Completion of the Black Country Green Belt Review is expected to be by the middle of 2018 and will enable the selection of preferred green belt site allocations for consultation in the Preferred Spatial Option report for the Core Strategy Review, due to be published in September 2018.

> **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?**

## Key Issue 7 – Keeping the Black Country connected

3.49   The existing spatial strategy focuses regeneration and development into a series of highly accessible high volume transport corridors where public transport accessibility is greatest.

3.50   The Black Country authorities are working with the other metropolitan authorities in the West Midlands to develop an overarching transport strategy and priorities for transport investment through the West Midlands Transport Strategy: Movement for Growth. The emerging strategy is

proposing a balanced approach to transport investment which recognises the need to invest in all modes of transport but also the critical need to increase the proportion of people using public transport and walking and cycling.

## Key Issue 8 - Providing infrastructure to support growth

3.51    Since the adoption of the current Core Strategy, national policy and the plans and requirements of infrastructure providers have changed and new information is available. Local Plan documents have been produced across the Black Country which have considered infrastructure needs in greater detail. Infrastructure requirements change over time and, in light of the growth required across the Black Country up to 2036, a review of infrastructure needs is required.

3.52    Physical and social infrastructure is required to enable and support the growth required over the plan period. New housing and economic development will put pressure on existing services and utilities, but may also create opportunities to provide infrastructure solutions to ease and remedy existing issues. This includes local, strategic and cross-boundary infrastructure requirements. A range of studies on infrastructure will be required to support the review, covering both brownfield regeneration areas and green belt sites.

3.53    Examples of potential infrastructure issues requiring further evidence are:

3.54    Work on the delivery of industrial sites has indicated there might be some limits on the electricity supply to support more industry, particularly energy-intensive heavy industry in certain areas of the Black Country.

3.55    The expansion of development of modern communications, with Government support for new technologies (3G, 4G, 5G) is leading to new proposals and expectations.

3.56    It is crucial that viability and market constraints that impact on the delivery of development sites are fully understood. The revised core strategy will be informed by robust delivery and viability studies that consider the delivery of the new growth identified as well as the impact that releasing green belt may have on urban areas to ensure that the strategy supports the regeneration of all the Black Country.

## Key Issue 9 – Working effectively with neighbours

3.57    The Black Country authorities are committed to working in partnership with all neighbouring and related authorities and key stakeholders at a sub-regional and regional level, and are actively involved in meeting their requirements under the duty to cooperate, as required by the NPPF. This will ensure that strategic priorities across local boundaries are properly coordinated and enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas.

3.58    There has been a significant amount of cooperation to date. This has included engagement through the West Midlands Metropolitan Area Authorities Joint Committee, the West Midlands Integrated Transport Authority and the West Midlands Duty to Cooperate Group, which provides a forum to facilitate active and on-going engagement on local plan preparation and cross boundary strategic priorities. On-going work is also taking place with authorities in the Greater

Birmingham and Black Country Housing Market Area on housing needs. Engagement also takes place through the Black Country Local Enterprise Partnership (BCLEP).

3.59    In June 2016 the West Midlands Combined Authority (WMCA) was formally established and will have a crucial role to play in supporting the delivery of the Core Strategy. The WMCA currently covers the geography of the BCLEP, the Greater Birmingham and Solihull LEP, the Coventry and Warwickshire LEP, Shropshire and Telford as shown on Figure 6.

**Figure 7        West Midlands Combined Authority**
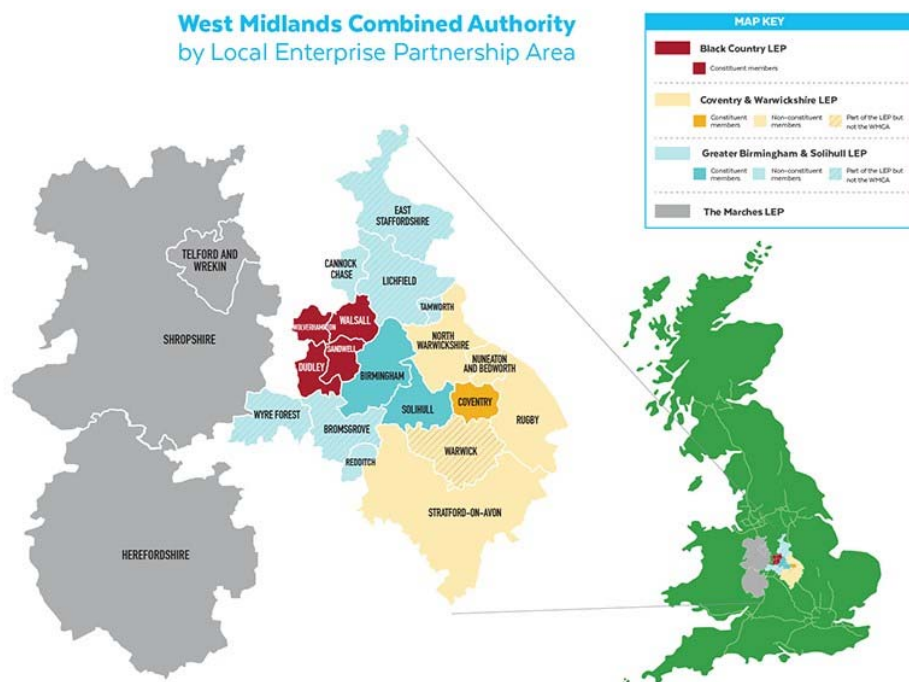


3.60    The WMCA has responsibility for transport strategy within the metropolitan area and important regeneration and economic development functions. The WMCA Strategic Economic Plan was produced in 2016 which sets out ambitious growth targets. The WMCA is also charged with coordinating the duty to cooperate across the area.

3.61    The Black Country authorities will continue to engage closely with neighbouring authorities and key stakeholders during the review process. Joint work is on-going with South Staffordshire District Council in particular. South Staffordshire forms part of the same Housing Market Area as the Black Country, and a joint SHMA has been prepared to reflect these close links. South Staffordshire also includes parts of the urban fringe of the Black Country, where the local authority boundary follows the edge of the urban area. The South Staffordshire Site Allocations Document has reached Publication stage, however given the scale of housing growth required a South Staffordshire Local Plan review is being advanced to allow parallel consideration of strategic issues affecting both the Black Country and South Staffordshire.

3.62    South Staffordshire also has a crucial role to play in contributing towards meeting the employment land needs of the Black Country, reflecting the interlinked economies of the area.

The South Staffordshire land portfolio is largely focussed on meeting demand for large, highly accessible premium sites that cannot be physically accommodated in the Black Country. These sites include the hugely successful i54 business park which is home to a number of international businesses including Jaguar Land Rover.

## Summary of the Key Issues

3.63    In summary, the key issues which are driving the Core Strategy review are:

- The existing evidence base is dated, and in parts does not provide a sound basis to underpin the Core Strategy as it rolls forward to 2036. A selective review and update of the evidence is needed to help test and re-shape the Plan.
- There is a need to continue to plan for a growing population. The existing strategy will meet the majority of long term needs and prioritising the delivery of brownfield sites within the urban area should continue. But there is a gap between need and anticipated supply of around 22,000 homes and there is a need to look beyond the existing Growth Network to meet it.
- New evidence tells us that the economy is forecast to grow over the review period at a faster rate than anticipated and there is a need to find more land in the right places, at the right time and of the right quality to support it. The existing Strategy can deliver a significant proportion of this need but, as with housing, there is a need to consider new locations and there are genuine spatial choices. This means that existing sustainable employment areas should also be protected and there is a need to plan for a net increase in employment land.
- Extending the Plan period and delivering significant levels of housing and employment growth will in turn support the viability of the Black Country centres. Growth targets for key town centre uses need to be revisited and there is a need to understand how changing consumer shopping patterns will impact on the role of the centres and the mix of uses they contain.
- An emerging body of work is promoting a more sophisticated approach to planning for environmental infrastructure and how it can support growth aspirations. The review needs to develop this thinking at a Black Country level into a series of locally-specific and inter-related programmes. The current mitigation strategy for Cannock Chase SAC also needs to be reviewed in light of growth aspirations.
- The green belt is central to the Strategy by providing areas of open land close to where people live and focussing development within the urban area. But there has been no strategic green belt review in the Black Country since the 1970s and, as a last resort, it is inevitable that some green belt land will be needed to accommodate long-term development needs. A strategic growth study will be commissioned to identify the most sustainable locations to meet these needs and this will include a robust green belt review.
- The review needs to reflect the recently adopted West Midlands Transport Strategy including key projects and programmes.
- National policy and the long term investment programmes of key infrastructure providers is constantly evolving. There is a need to review the capacity of existing infrastructure against its ability to support the existing Strategy and the additional anticipated growth.
- The regional landscape within which the Black Country sits is changing. The West Midlands Combined Authority will have a more significant role over the Plan period and there is a need to reflect the aspirations of the Strategic Economic Plan and other key programmes associated with HS2. The need is also recognised to work much more closely with

neighbouring authorities on issues of cross-boundary significance such as housing, employment and transport

**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?**

# 4. Reviewing the Strategy to Meet New Challenges and Opportunities

4.1 Part 2 of this Report summarised the existing Core Strategy and showed how it has been an effective tool to shape the location and form of development and regeneration in the area since 2011. However, given the challenges and opportunities that the Black Country now faces, it is important to revisit the vision and objectives of the Core Strategy to consider if these are still relevant and if the Spatial Strategy is still appropriate looking forward to 2036.

4.2 This part of the Report addresses this by testing the Vision and Objectives and then setting out a series of Options on how the key issues summarised in Part 3 can be addressed.

## Vision, Principles, Spatial Objectives and Strategic Policies

4.3 The Core Strategy sets out a vision, based on three major directions of change:

- Sustainable Communities;
- Environmental Transformation; and
- Economic Prosperity,

4.4 These directions of change reflect the three dimensions of sustainable development set out in the NPPF, and are supplemented by five more locally specific sustainability principles:

- facing up to climate change;
- sustainable development;
- social inclusion;
- putting brownfield first; and
- a comprehensive approach to development.

4.5 It is considered that this vision and set of principles remain fundamental to the review of the Core Strategy, and should be the starting point when examining sources of land supply for new homes, employment and other land uses, for example ensuring that new housing is located with good sustainable access to employment uses, whilst safeguarding and enhancing the environment.

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

4.6 In order to deliver this Vision, and in line with the Principles, the Core Strategy set out a series of ten spatial objectives which formed the starting point for the spatial strategy and strategic policies. These objectives are:

1. Focussed investment and development in comparison shopping, office, employment, leisure, tourism and culture within the four Strategic Centres.
2. A restructured sub-regional economy which provides sufficient strategic high quality employment land in the best locations within Regeneration Corridors to attract new high technology and logistics businesses and also recognises the value of local employment land.
3. Model sustainable communities on redundant employment land in the Regeneration Corridors.

4. Enhancements to the character of the Black Country's existing housing areas.

5. A network of vibrant and attractive town, district and local centres.

6. A high quality environment.

7. A first-class transport network providing rapid, convenient and sustainable links between the Strategic Centres, existing and new communities, and employment sites.

8. A sustainable network of community services, particularly high quality lifelong learning, health care and sport and recreation facilities.

9. Sufficient waste recycling and waste management facilities in locations which are the most accessible and have the least environmental impact.

10. Safeguard and make the most sustainable use of the Black Country's mineral resources including primary, secondary and recycled materials, without compromising environmental quality

4.7    It is considered that this set of objectives remains a sound basis for the planning and regeneration of the Black Country over the review period.  However, following the completion of the evidence base summarised in Table 1, some of these objectives may need to be amended, for example, the changing role of centres and the opportunities provided by bringing forward new sources of housing land supply.

> **Question 8 - Do you think that the Core Strategy spatial objectives remain appropriate? Yes/No If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?**

4.8    These objectives form the basis for five strategic policies which set out the overarching Spatial Strategy summarised in Part 2.  These policies are:

- CSP1 – The Growth Network
- CSP2 – Development Outside the Growth Network
- CSP3 – Environmental Infrastructure
- CSP4 – Place-Making
- CSP5 – Transport Strategy

4.9    It is considered that, in the main, the overall approach which underpins these Policies remains appropriate, however they will require updating in response to the new challenges and opportunities outlined in Part 3.  It is anticipated that figures in Policy CSP1 and Table 1 (which shows the distribution of development between the Growth Network and the rest of the Black Country) will need to be updated and rolled forward to 2036 in line with new evidence, and that minor changes will need to be made to the extent of the Regeneration Corridors to reflect Local Plans.  Based on emerging evidence, the approach to development outside the Growth Network is likely to be subject to significant change in order to accommodate housing and employment land growth needs.  Therefore Policy CSP2 will need to reflect new growth proposals outside the Growth Network and proposed changes to the green belt boundary.  Proposed changes to Policies CSP3, CSP4 and CSP5 are set out in Part 6.

## Reviewing the Spatial Strategy

4.10    The existing Core Strategy is ambitious.  It looks to regenerate a growth network of four Strategic Centres and sixteen Regeneration Corridors within the urban area and to meet growth needs by making maximum use of previously developed land within this network - largely redundant and under used employment sites.  The growth network covers areas with high accessibility, including key public transport corridors with a high frequency service, and includes the vast majority of development opportunities.  The green belt around the urban area is protected from development.

**Figure 8        Current Local Plan Allocations**
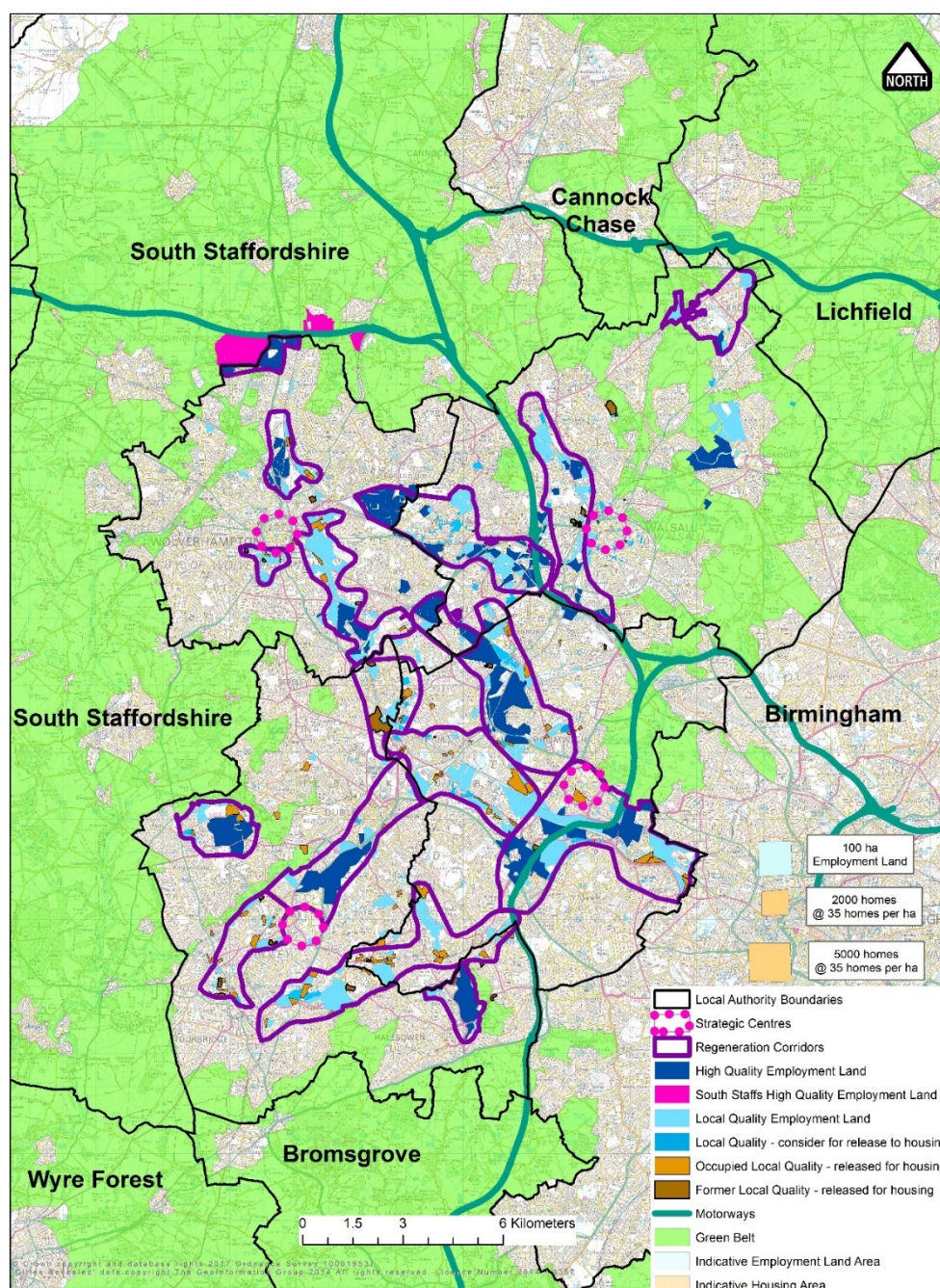
4.11    The current Local Plan allocations which have been made in accordance with the spatial strategy are shown on Figure 8.  This strategy, with its focus on the Growth Network, has the ability to meet the majority of long term development needs and so should be largely carried forward into the review.

4.12    However, new evidence indicates that further land will be needed, beyond the existing spatial strategy, to meet all of the Black Country's growth needs.  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.

4.13    In responding to this challenge there are choices to be made.  It is proposed that these choices are made sequentially, as set out in Table 2 below:

**Table 2         Approach to accommodating growth**

| Stage | Options | Description |
|---|---|---|
| 1 – Continuing the role of the Growth Network | 1A | Continue and strengthen the Growth Network with some corridors being housing led and others employment led. Remaining housing and employment land growth to be accommodated in the green belt. |
| | 1B | Restructure the existing Growth Network, with more occupied employment land being redeveloped for housing in the Regeneration Corridors.  Remaining housing and employment land growth, and replacement employment land, to be accommodated in the green belt. |
| 2A – Housing Development outside the Growth Network | H1 | Rounding off the green belt and meet housing needs through a large number of small sites. |
| | H2 | Identification of a limited number of large Sustainable Urban Extensions in the green belt |
| 2B – Employment Development outside the Growth Network | E1 | Extend existing employment areas on the urban fringe into the green belt |
| | E2 | Provide new freestanding employment sites in sustainable locations in the green belt |
| | E3 | Provide new employment land within Sustainable Urban Extensions in the green belt |
| | E4 | Export growth to neighbouring areas with strong economic links to the Black Country |

4.14    Stage 1 will explore the opportunities that exist to maximise the growth potential of the urban area by testing how existing land is used within the Growth Network, with a focus on employment land as the main 'variable'.  On the basis of Stage 1, Stage 2 will test the capacity of new sources of land supply outside the urban area for both housing and employment.  In the Black Country, all land outside the urban area is designated as green belt.  Therefore, some green belt land will be needed to be identified for development in the Plan if growth needs are to be met – the scale and mix of which will be determined through the Stage 1 Options.

4.15    The Options are described in more detail in the following sections.

## Stage 1: Strategic Options 1A and 1B – continuing the role of the Growth Network

4.16 Within the Growth Network, the existing Core Strategy supports a sustainable mix of uses but with some Regeneration Corridors focussed on employment land and others on housing. This approach could be changed by restructuring some of the Regeneration Corridors to change the balance between employment and housing - relocating some existing employment activity to the edge of the urban area and replacing it with high quality residential areas.

4.17 Two strategic option have been identified. Option 1A continues the existing strategy, with some Regeneration Corridors being housing led and others employment led. Housing and employment land growth needs would be accommodated outside the Growth Network, in the green belt.

4.18 Option 1B involves restructuring the existing Regeneration Corridors, with more of the existing employment land being replaced with housing, and remaining growth needs and replacement employment land being provided in the green belt. This option may allow more housing need to be met within the Black Country, however delivery will be very challenging due to the high costs of site assembly, business relocation and land remediation and so significant public sector funding would be required.

4.19 Underpinning both of these options is the strategic need to increase the employment land stock as recommended in the EDNA – this is in contrast to the existing Core Strategy which plans for a net contraction in employment land. This means that any employment land 'displaced' through Option 1B will need to be made up elsewhere.

4.20 The opportunities and challenges presented by the Strategic are explored below.

---

**Strategic Option 1A - Meet all remaining housing and employment land growth needs outside the Growth Network**

Description - Continue and strengthen the Growth Network with some corridors being housing led and others employment led. Remaining housing and employment land growth to be accommodated in the green belt.

| Opportunities | Challenges |
|---|---|
| • Can provide for a sustainable pattern of development, close to the urban edge and close to where need arises within the Black Country. <br> • Can facilitate the extension/expansion of high frequency public transport corridors. <br> • Would significantly boost the supply of housing and employment land. <br> • Would broaden the range and diversity of new homes available. <br> • Would reduce the need to promote the redevelopment of existing employment sites for residential development. <br> • Opportunities to create balanced communities with new local facilities and employment areas which could | • Would require significant adjustments to the green belt boundary to release land for development beyond the urban area. <br> • Limited scope for development in some parts of the urban fringe. <br> • May not have sufficient capacity to accommodate all growth needs <br> • Capacity of public transport will need to be increased to accommodate growth in some locations. <br> • Additional infrastructure investment will be required in some locations, including schools. <br> • Delivery on larger sites may be towards the end of the plan period. <br> • Impacts on the wider transport network may need to be mitigated in some locations. |

| | |
|---|---|
| also benefit those living on the urban edge. | |

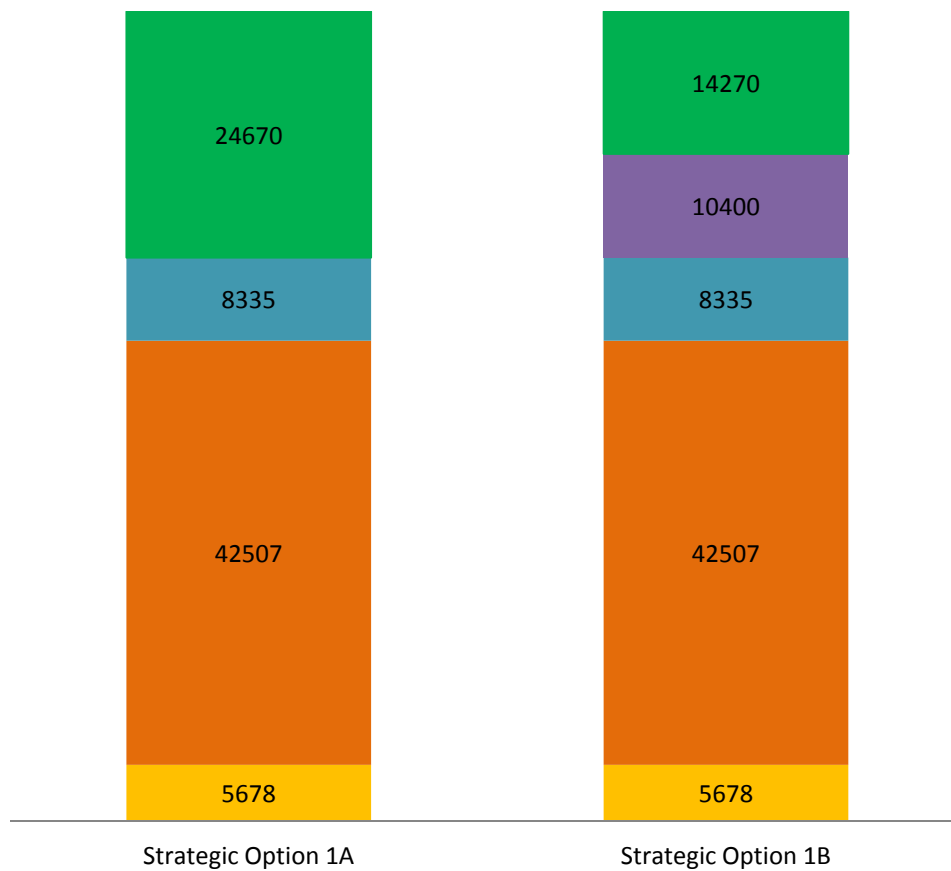| **Strategic Option 1B – Restructure the Growth Network** | |
|---|---|
| Description - Restructure the existing Growth Network, with more occupied employment land being redeveloped for housing in the Regeneration Corridors.  Remaining housing and employment land growth, and replacement employment land, to be accommodated in the green belt. | |
| **Opportunities** | **Challenges** |
| • Better able to accommodate housing need within the Black Country.<br>• Could provide for development to take place within the urban area closer to where need arises.<br>• Will support on-going regeneration and investment in the urban area with consequential social and economic benefits.<br>• Will provide a wider range of uses within Regeneration Corridors. | • Extremely challenging in terms of delivery and viability, requiring significant public sector funding for land remediation and assembly and business relocations.<br>• Intentions of businesses / landowners in Regeneration Corridors are not known at this stage.<br>• There may not be sufficient suitable locations in the green belt to meet employment land needs.<br>• Would require significant adjustments to the green belt boundary to release land for development beyond the urban area.<br>• May not have sufficient capacity to accommodate all growth needs<br>• Capacity of public transport will need to be increased to accommodate growth in some locations.<br>• Additional infrastructure investment will be required in some locations, including schools.<br>• Delivery on larger sites may be towards the end of the plan period.<br>• Impacts on the wider transport network may need to be mitigated in some locations. |

The Options are illustrated in Figure 9 below.

## Figure 9  How the Strategic Options could Meet Housing Need

- 🟨 Housing Completions 2014-16

- 🟧 Existing housing supply in the urban area

- 🟦 Estimated further housing supply in the urban area

- 🟪 Release of further occupied employment land for housing (indicative maximum if past Local Plan allocation trends continue - to be tested)

- 🟩 Release of green belt for housing

| | Strategic Option 1A | Strategic Option 1B |
|---|---|---|
| Release of green belt | 24670 | 14270 |
| Release of employment land | | 10400 |
| Estimated further supply | 8335 | 8335 |
| Existing supply | 42507 | 42507 |
| Housing Completions | 5678 | 5678 |

**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?**

**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.**

## Stage 2: Strategic Options 2A and 2B – Housing and Employment outside the urban area

4.21    The Stage 1 Options will provide an overall steer on how much housing and employment development will need to be accommodated outside the urban area. For Stage 2, two sets of Options have been identified, one for housing (2A) and one for employment (2B).

**Strategic Option 2A – accommodating housing growth outside the urban area**

4.22    Two broad Housing Spatial Options have been identified.

4.23    Spatial Option H1 is based on 'rounding off' the green belt edge by identifying a large number of small to medium sized sites. There are significant green belt wedges which extend into the Black Country urban area which could also be 'rounded off' as part of this Option. Sites could range in size from a few homes to hundreds of homes, where this would provide a defensible new green belt boundary and sufficient services exist.

4.24    Spatial Option H2 adopts a more focussed approach by identifying a limited number of large scale Sustainable Urban Extensions (SUEs). The Strategic Housing Needs Study (SHNS) defines a SUE as a development on the edge of a settlement which can accommodate 500-5,000 homes and is of a scale appropriate to the size of the settlement being extended. No SUEs are currently being promoted in the Black Country. At this stage, no size of SUE has been ruled out.

4.25    The SHNS considered the potential to locate SUEs close to existing railway stations, to promote sustainable transport and meet the needs of new households to access employment hubs. Future opportunities may arise from planned improvements to the West Midlands railway network, including additional capacity and electrification of some lines. In the longer term, HS2 will provide further opportunities and there is potential to provide a station at Aldridge on the existing network.

4.26    Development of a certain critical mass can itself support changes to public transport accessibility by making routes more viable or funding infrastructure. However, this may be challenging and expensive to achieve and should only be considered as a realistic option when robust evidence can demonstrate its deliverability. In particular, it is likely that only an SUE of 10,000+ homes could support the provision of a new rail station.

4.27    At a local level, there is also potential to extend the existing Regeneration Corridor network (corridors 7, 11, 13, 14 and 15) into the green belt, which may support the existing spatial strategy. There may be other ways for green belt releases to support the urban regeneration

strategy, for example through cross-funding infrastructure required for regeneration, or through phasing to allow brownfield sites to be brought forward first.

4.28 Depending on size and location, a SUE could require a range of infrastructure and services, including new roads, footpaths and cycleways, drainage and services, open spaces, shops and schools. For large SUEs, there is also the potential to provide employment land as part of a mixed use development to help meet employment land requirements and a balance of uses. The amount of housing that can be delivered in SUEs over the Plan period is likely to be limited by market and infrastructure delivery constraints. For this reason, smaller sites may produce more housing completions than a single SUE in one location.

4.29 The opportunities and challenges presented by the two Housing Spatial Options are explored below.

**Spatial Option H1 – Rounding off**

Description - "Round off" the edge of the green belt, including internal green belt wedges, to release a large number of small to medium sized sites for housing.

| Opportunities | Challenges |
|---|---|
| • Could provide for a sustainable pattern of development where local public transport and residential services are present <br> • Smaller sites may require less new infrastructure then larger sites so could have shorter delivery timescales <br> • Would provide sites suitable for a broader range of housebuilders and so potentially higher levels of completions. <br> • Could provide for development to take place within the urban area closer to where need arises. <br> • Could promote wider choice and opportunity within the housing market and allow diversification of the housing stock. | • Would require many minor adjustments to the green belt boundary, with a potentially greater impact on a wider area. <br> • This option would not meet all the housing needs. <br> • Smaller sites may not individually trigger requirements for new infrastructure but could place cumulative pressure on existing infrastructure. |

**Spatial Option H2 – Sustainable Urban Extensions**

Description - Release land from the green belt to allocate a limited number of Sustainable Urban Extensions across the Black Country (including cross boundary options) in the most sustainable locations which have the potential to be well served by infrastructure.

| Opportunities | Challenges |
|---|---|
| • Would significantly boost the supply of housing and maximise provision of affordable housing <br> • Could provide for development to take place close to the urban edge, near to | • Would require large-scale adjustments to the green belt boundary with potentially major impacts on green belt purposes and environmental assets, focused in the areas concerned. <br> • Likely to concentrate delivery later in the plan period due to |

| | |
|---|---|
| where need arises. | infrastructure and phasing issues. |
| • Could promote choice and opportunity within the housing market and allow diversification of the housing stock in the areas concerned. | • Risk of over reliance on a limited number of large sites. |
| • More opportunity to provide necessary infrastructure as part of large planned developments. | • Delivery may be limited by market and infrastructure constraints. |

4.30    Some individual development opportunities may fall under more than one of the Spatial Options.  At this stage it is not possible to be specific about the precise implications for each of the Options, however, they have been subject to a high level sustainability appraisal.  The next stage of the review process will assess the merits of each of the Options in light of the Call for Sites responses and the results of the Black Country Green Belt Review (see Part 2) in order to arrive at a Preferred Spatial Option.

**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.**

**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).**

**Question 13a – Do you support Spatial Option H2?**
**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.**

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

**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?**

**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**

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

**Meeting housing needs outside the Black Country**

4.31    If, when these two Housing Spatial Options have been fully explored, total need still cannot be met, the Black Country would need to work with other authorities to "export" the remaining shortfall.  Exporting means that other authorities agree to try and accommodate part of the shortfall through a review of their Local Plan.  In the first instance growth should be exported to authorities within the Greater Birmingham and Black Country Housing Market Area (HMA), as the Black Country has the strongest migration and commuting links with these areas. However, if these authorities are not likely to 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.  In both cases release of green belt land would be the last resort.

4.32    The potential challenges raised by exporting are:
- Limited opportunities to provide the types of homes needed by Black Country residents, including affordable homes
- An increase in migration flows and commuting between the Black Country and other areas
- A 'real' decline in the Black Country's population

4.33    However, there are also potential opportunities:
- Growth could support investment in transport infrastructure to more closely link developments to the Black Country.
- Some sites in neighbouring authorities could be more sustainable and deliverable than sites within the Black Country's green belt.

4.34    As the Black Country boundary follows the edge of the urban area in many places, areas on the urban fringe of the Black Country which fall within neighbouring districts of South Staffordshire, Bromsgrove, Cannock and Lichfield may provide sustainable locations for growth to meet Black Country needs.  Given the possibility that exporting housing growth to authorities within the HMA will be necessary, the Call for Sites extends to parts of these authorities which adjoin the Black Country urban area or which could potentially form part of a larger development which would adjoin the Black Country urban area.

**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?**

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

**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)**
**If yes, please provide details.**

**Strategic Option Area 2B – accommodating employment land growth outside the urban area**

4.35 It is considered that the provision of additional employment land to meet needs should continue to focus on recycling brownfield land within established and safeguarded / allocated employment areas. Such areas remain the most sustainable locations and recycling this land contributes towards the overarching strategy of urban regeneration. However, evidence has identified that, to meet future need and particularly to provide an appropriate portfolio of land and sites, options for meeting employment land growth in the green belt potentially need to be considered. Four Spatial Options have been identified, however the preferred option could be a combination of these, and all of the Spatial Options may be required to meet total need.

4.36 The opportunities and challenges presented by the Employment Land Spatial Options are explored below.

**Spatial Option E1 – Extend existing employment areas on the urban fringe into the green belt**

Description – extend existing employment sites and areas on the edge of the urban area into adjoining green belt land.

| Opportunities | Challenges |
|---|---|
| • Maximises use of existing infrastructure<br>• Potentially less impact on the green belt purposes and environmental assets | • Limited capacity around some employment sites. |

**Spatial Option E2 – Provide new freestanding employment sites in sustainable locations in the green belt**

Description – identify new high quality employment sites in sustainable and highly accessible locations in the green belt.

| Opportunities | Challenges |
|---|---|
| • Potential to attract national and international, footloose investment.<br>• Opportunity to provide a balanced supply of employment land across the Black Country including areas not currently well served by a range of employment land. | • May require significant infrastructure with associated viability challenges.<br>• Would require the release of significant areas of green belt and have potentially greater impact on environmental assets. |

**Spatial Option E3 – Provide new employment land within Sustainable Urban Extensions in the green belt**

Description – include employment land within large scale mixed use Sustainable Urban Extensions on the edge of the Black Country urban area.

| Opportunities | Challenges |
|---|---|
| • Could use infrastructure provided to support comprehensive | • Would be dependent on being able to identify SUEs of a sufficient size in appropriate locations. |

| | |
|---|---|
| development with the potential for cross subsidy. | |

**Spatial Option E4 – Export growth to neighbouring areas with strong economic links to the Black Country**

Description - explore opportunities to provide high quality employment land in neighbouring areas with strong economic links to the Black Country

| Opportunities | Challenges |
|---|---|
| • Eliminates the need to find sites within the Black Country green belt with any associated constraints. | • May not be the most sustainable option as it moves jobs further away from where people live. |

**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).**

**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?**
**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).**

**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)**
**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).**

**Question 19a – Do you support Spatial Option E4? Yes/No**
**If no, please explain**
**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)**
**If you think there are any potential locations that should be considered, please provide details.**

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

# 5. Delivering Growth – Infrastructure and Viability

## Introduction and scope

5.1 This Part of the Report considers what infrastructure will be required to support both existing needs, and the growth set out in Part 3.

5.2 So that communities, industries and commercial activity across the Black Country can be vibrant, accessible and healthy they need to be well-served by a range of supporting infrastructure including schools, affordable housing, transport networks, shops, open spaces, recreational and community facilities and support from health and emergency services. Modern high quality commercial developments also require the support of a range of infrastructure to be sustainable and attractive, including motorway and public transport access, flood water management, waste management and disposal, utilities (water supply and waste water management, electricity and gas) and communications infrastructure (including 5G).

5.3 The current Core Strategy seeks to meet development needs up to 2026 within the existing urban area. The evidence and the consultations undertaken for that plan indicated that the urban regeneration strategy made the best use of existing infrastructure and that in broad terms sufficient infrastructure existed or could be provided to help deliver the strategy. The Infrastructure Delivery Study (2009) and the Delivery and Implementation Plan (2010) were produced as part of the 2011 adopted Strategy and were described by the Inspectors who examined the Core Strategy as *"both detailed and comprehensive"* (IR para. 7) and the Inspectors concluded that they considered *"there are reasonable prospects of delivering the necessary majority, if not all, of the new infrastructure identified, including public and other transport improvements, before 2026"* (IR para. 8)

5.4 The growth in development required across the Black Country up to 2036 will place pressure on existing physical, social and green infrastructure, and measures need to be in place to ensure that new growth is supported by appropriate and timely infrastructure provision so that vibrant and sustainable communities can be created and maintained. This will also create opportunities to provide infrastructure solutions to ease and remedy existing issues.

5.5 The NPPF states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure, and its ability to meet forecast demand. Core Strategy Policy DEL1 Infrastructure Provision requires all new development to be supported by the necessary on and off-site infrastructure to serve the development, mitigate its impacts on the environment, and ensure that the development is sustainable and contributes to the proper planning of the wider area. In line with this Policy, the specific infrastructure requirements for developments up to 2026 have been set out in Local Plan documents adopted for each local authority, in the context of local needs and availability of funding.

5.6     In addition to identifying more land within the urban area for future growth, this review will consider the need to release areas on the urban fringe for development, including potentially large Sustainable Urban Extensions (SUEs). These areas may have more limited access to the range of infrastructure needed to create sustainable development. Some of this infrastructure, such as flood water management, utilities and communications, may be relatively easy and viable to provide. However, infrastructure which requires significant up-front investment, such as new roads, or on-going service provision, such as schools, public transport and community services, may be more challenging to provide.

> **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.**

## Social Infrastructure

5.7     New housing may in some locations create a need to expand health, educational and other community services. As options for the location of major new housing allocations develop through the review process, so will decisions about the need for any such facilities and their locations. The NPPF recognises the importance of positive planning for inclusive communities and states that local plans should provide for shared spaces for people to meet and for facilities that communities need, as well as safeguarding against the unnecessary loss of valued facilities and services. It also promotes an integrated approach to considering the location of community, leisure and other facilities together with housing.

5.8     New housing will create additional demand for school places and health services. At the same time, changes in the existing population structure and the way that services are delivered mean that alterations may need to be made to the types and locations of facilities. Education establishments, outdoor recreational facilities (such as playing fields and golf courses) and cemeteries need large areas of land on which to operate and expand – and in the Black Country many of these facilities are located on the urban fringe.

5.9     There is a rich and diverse network of public open spaces areas, formal parks, canals and outdoor recreational areas such as playing fields and nature reserves throughout the Black Country urban area, which extends out into the urban fringe. This network contributes to the health and wellbeing of Black Country residents by helping to encourage physical exercise and sustainable transport. Improvements to this network to serve urban fringe developments could benefit the existing urban area.

5.10    The Midlands Engine Strategy recognises that the Midlands is a powerful engine for national economic growth and includes a range of initiatives to create more jobs, grow productivity and help close the skills gap with the rest of the country. New development across the Black Country has a role to play in achieving these aims through the provision of local employment and training opportunities during both construction and end use phases. Core Strategy Policy EMP5 'Improving Access to the Labour Market' aims to capture this aspect of social infrastructure resulting from new development.

> **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.**

> **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.**

> **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.**

> **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.**

## Physical Infrastructure

5.11    Physical Infrastructure is defined as transportation and utility provision including water, energy and telecommunications.

5.12    The transport network in the Black Country is very well connected to the rest of the UK and provides a reasonably good level of service.  A significant network of local roads connects the settlements throughout the Black Country.  In terms of public transport the rail network includes four passenger rail lines and the Midland Metro light rail system that operates between Birmingham and Wolverhampton, whilst a comprehensive bus network operates throughout the Black Country.  The existing Core Strategy identifies a comprehensive package of transportation infrastructure requirements set out in Policy TRAN1.  These projects are still appropriate but additional infrastructure will be required to support the higher levels of growth required and to serve new development locations.

5.13    The Black Country has a comprehensive network of Public Rights of Way which are both a recreational resource and an important provider of links to other forms of transport.  In addition there are on road cycle routes including those on the National Cycle Network.

5.14    An outline Water Cycle Study (WCS) for the Black Country was undertaken to support the Core Strategy which concluded that the water supply was satisfactory and did not identify any major issues with sewage and water treatment capacity. The water companies also did not identify a need for new waste water treatment infrastructure during the preparation of the Core Strategy. Engagement will be needed between the Black Country authorities, the Environment Agency and water providers to ascertain if there are any issues with the supply and treatment of water that would impact on the ability to deliver any further housing or employment growth.

5.15  Any further housing and employment developments will need to be connected to gas and electricity services. Whilst historically there have not been issues with the provision of such utilities, particularly industrial uses may require infrastructure improvements to the electricity network in the long term in certain areas.

5.16  The NPPF notes that advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology (5G) and other communications networks also plays a vital role in enhancing the provision of local community facilities and services and can be a factor in attracting industries that make use of this technology. It can also lead to changes in working patterns and reduce the need to travel, for example by enabling home working. However, other than the provision of masts to support mobile communications, and encouraging "passive provision" in new developments in the form of trunking to carry fibre optic cables, the role of the planning system in facilitating high speed telecommunications is limited. There are no known limitations affecting the capacity of the communications network in the Black Country.

5.17  As part of work undertaken for the UK Renewable Energy Strategy (2009) and Renewable Energy Action Plan for the UK (2010), the potential for the development of new renewable energy and combined heat and power (CHP) infrastructure in the West Midlands has been explored in a study carried out on behalf of the West Midlands local authorities, following the methodology recommended by the Department for Energy and Climate Change (DECC). The 2011 study 'Renewable energy capacity study for the West Midlands' suggests that in the Black Country there is relatively low capacity, largely comprised of microgeneration.

**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.**

**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.**

**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?**

**Delivery and Viability**

5.18    The existing Core Strategy covers the period 2006-2026 and set ambitious regeneration targets. Achievement to date in meeting these targets is set out in Appendix C and summarised below.

5.19    Sufficient land has been allocated to meet the overall Core Strategy housing target and reasonable progress has been made on housing completions to date, despite the dampening effects of the recession. Many of the housing allocations are affected by delivery issues, including poor ground conditions, low market values and fragmented land ownership and some will need gap funding to ensure delivery by 2026.

5.20    The Core Strategy aimed to shrink the stock of Local Quality Employment Land through redevelopment of surplus land for housing. However, the employment land stock has proved to be more resilient than predicted and sites have proved difficult to bring forward for housing through Local Plans. Therefore, although there has been a loss of nearly 400 ha of Local Quality Employment Land, this is nearly 150 ha short of the target for 2016. The stock of Strategic High Quality Employment Land in the Black Country has not grown as much as planned, however quick progress in delivery of sites in South Staffordshire, including i54, and the emergence of new sites on the urban fringe have helped to balance this effect. The overall effect has been that total employment land has fallen to slightly less than the level expected by 2016 (3,335 ha compared to 3,392 ha).

5.21    The recession, internet and changing shopping patterns have meant that the anticipated delivery of 249,000 sqm of comparison shopping floorspace is not on course to being delivered with only 23,294 sqm being completed to date. Likewise, delivering offices in Strategic Centres, with a target of 220,000 sqm, was always ambitious and the completion of 28,244 sqm shows that delivery has been challenging. To maintain the vitality and viability of centres, the future functions will need to take into account the challenges and assess what level of comparison and office floorspace are required and can be delivered and what other uses are suitable.

5.22    There has been no significant change in the amount of open space available across the Black Country over the past decade. However, revised open space needs assessments and changes in population have resulted in changes to open space standards, methods of calculation and the amount of open space per 1,000 population. Currently Walsall, Dudley and Sandwell fall below the current quantity standard for open space and Wolverhampton is above standard. Dudley is currently undertaking an open space needs assessment update.

5.23    Poor ground conditions, a legacy of the Black Country's mining and industrial past, affect much of the area. As ground conditions are a major constraint on delivery, land remediation is a priority for delivery intervention. It is recognised that in dealing with individual development proposals, exceptional circumstances may occasionally arise which result in

genuine financial viability concerns, for example where remediation costs are above what could reasonably have been foreseen.   The Black Country has a good track record of working with developers to address viability issues and deliver sites.

5.24    The delivery of green belt sites may also raise viability issues with the need for new infrastructure to develop sites or environmental constraints such as flood risk which will need to be mitigated.  Delivery work will be undertaken to understand the size of green belt sites required to make developments viable and to deliver the infrastructure needed to support the sites.

5.25    Viability negotiations between Local Planning Authorities and developers aim to secure the maximum value of infrastructure to mitigate the impact of development, whilst working with developers to enable development to come forward. To this end one or more of the following mechanisms can be considered:
Deferred or Staged Payments
Clawback
Phased Viability Assessments
Time Constrained Planning Permissions

5.26    As part of the Core Strategy review the impact of any green belt release on the delivery of brownfield sites will also be considered to ensure that the current regeneration strategy is not undermined.

**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.**

**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**

## Funding for Site Development and Infrastructure

5.27    In order for the vision for the Black Country to be realised, investment and funding for site development and infrastructure will need to come from a wide variety of sources including both public and private sector investment, often working in partnership with one another.

5.28    As has been demonstrated by the delivery of development sites in the Black Country since adoption, there has been a key role for the public sector in de-risking development activity and securing delivery.

5.29 The Black Country's brownfield first approach – while the most sustainable way of meeting development needs – brings with it significant challenges associated with development viability and addressing market failure. The use of public sector resources, assets and funding investment- will continue to play an important role, and will be essential to the delivery of many privately owned development opportunities where development is compromised as a result of higher costs of delivery and relatively low land and rental values. This means that around 25% of the existing Black Country housing land supply and 30% of employment sites are not economically viable under current market conditions. The public sector has the opportunity to address this through its interventions and funding programmes, and by working in partnerships with the private sector to improve the overall return on investment for all partners.

5.30 The positive impact of investment by the Black Country local authorities, the LEP and partners into sites in the form of investment into site remediation and servicing works to change a derelict site into a development opportunity available for early development is evident. I54, Opus Blueprint and Pantheon Park demonstrate that where works are undertaken to address issues of site remediation and infrastructure works developers can offer potential investors' well-presented sites which are capable of early development- noting that all three schemes were all delivered through public sector intervention.

5.31 Examples of key sources of potential public sector funding include resources available through the **Black Country Local Enterprise Partnership (LEP) which** is focused on creating greater economic prosperity across the Black Country area, identifying the need for infrastructure and environmental enhancements as a key stimulus for economic development. The LEP's City and Growth Deals provide loan and grant funding to a range of capital investment projects. The Black Country Enterprise Zone (in Dudley, Walsall and Wolverhampton) provides a facility for the LEP to retain future business rates generated by employment/ commercial uses and use these to pay back local authority prudential borrowing that is used to front fund infrastructure improvements. New Housing Zones in Sandwell will also provide interventions to support the delivery of key housing sites.

5.32 **The West Midland Combined Authority** aims to improve the quality of life of everyone who lives and works in the West Midlands, with priorities on Transport, Housing, Skills and the Economy. The West Midlands Strategic Transport Plan 'Movement for Growth' identifies a range of priority infrastructure projects, including local rail improvements, transport interchanges and park and ride sites. Recently the WMCA launched its Collective Investment Fund- a loan facility for commercial development and from later this year (2017) around £200m of funding to unlock constrained Black Country sites will be made available through the 'Land Remediation Fund'.

5.33 These programmes and funding streams should provide enough support to bring forward a sufficient supply of land to meet short to medium term needs as set out in the existing Local

Plan. The Black Country authorities will continue to work with the LEP, WMCA and key Government agencies including the HCA to ensure that their policies and programmes continue to be aligned with Black Country priorities.

5.34    For the Black Country vision to be achieved it is essential that new developments address their impacts directly and provide the on and off-site physical, social and green infrastructure needs associated with the development, especially where overall scheme viability allows.

5.35    There are a number of mechanisms that can be used to secure and deliver necessary infrastructure through the planning system depending upon the circumstances:

5.36    **Planning Conditions** can be used to secure a good quality development and reduce any adverse impacts including the provision of on-site infrastructure.

5.37    **Planning Obligations** are used to secure affordable housing and, where it can't be secured through a Planning Condition, infrastructure that is necessary to make a development acceptable by mitigating the direct impacts of that development either through onsite provision or financial contributions for off-site delivery.

5.38    **Highway Authority Obligations (Section 278 Agreements)** can be used to secure highway improvement works relating to the Strategic Highway Network.

5.39    **Community Infrastructure Levy (CIL)** is a charge that Councils can apply to most types of new development. The proceeds of CIL can be pooled and spent on more generalised local and, where necessary, sub-regional infrastructure to support new development. Dudley and Sandwell Councils have adopted CIL Charging Schedules. At present City of Wolverhampton Council do not plan to adopt a CIL. There may be a need to review the use of CIL in response to future announcements from the Government following the Housing White Paper.

> **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?**

# 6. Review of Existing Core Strategy Policies and Proposals

6.1     The Core Strategy was adopted in 2011.  Following publication of the National Planning Policy Framework (NPPF) in 2012 a conformity assessment was undertaken and that judged the Core Strategy to be compliant with the NPPF.  Many of the Core Strategy policies remain fit for purpose and can be rolled forward with minor updates to reflect changing circumstances. However, some have been overtaken by events and will need to be updated or amended more significantly.  In particular, some policies may need amending to reflect differing policy requirements for sites within the urban area and outside it.

6.2     This Part of the Report considers each of the Core Strategy policy areas in turn to identify those which need only minor amendments and updates to figures and those which may need to be significantly amended, removed or replaced.

6.3     This Part of the Report is divided into the following Policy areas:

    a.   Health and Wellbeing
    b.   Creating Sustainable Communities
    c.   The Economy and Employment
    d.   Centres
    e.   Transportation and Accessibility
    f.   The Black Country Environment
    g.   Waste
    h.   Minerals
    j.   Growth Network Detailed Proposals
    k.   Monitoring and Additional Policies

6.4     Table 3 provides an overview of the extent to which the current Core Strategy policies may be changed as part of this review.  This is just to provide an indication of current thinking and the 'degree of change' may well alter as a result of consultation responses or new evidence. Please see the individual policy areas for further detail.

**Table 3          Overview of Potential Changes to Existing Core Strategy Policies**

| Existing          Core Strategy Policy | Degree of Change to be consulted on | Reason for potential change |
|---|---|---|
| CSP1 The Growth Network | Major | Figures within the policy are likely to be updated as a result of new evidence and minor changes made to the extent of the Regeneration Corridors to reflect Local Plans. |
| CSP2 Development Outside the Growth Network | Major | Based on emerging evidence, the approach to development outside the Growth Network is likely to be subject to significant change in order to accommodate housing and employment land growth needs. |
| CSP3 Environmental Infrastructure | Major | Garden City principles could be added to the policy along with the removal of references to renewable energy. |
| CSP4 Place Making | None | Place making strategy and principles are considered robust and unlikely to require amendment. |
| CSP5      Transport Strategy | None | Transport strategy and principles are considered robust and unlikely to require amendment. |
| DEL1 Infrastructure | Potentially Major | The policy may need to be changed to reflect new infrastructure |

| | | |
|---|---|---|
| Provision | | needed to support development outside the urban area. Minor changes may also be needed to reflect potential changes to national policy in securing infrastructure contributions from developers. |
| DEL2 Managing the Balance between Employment Land and Housing | Potentially Major | Changes may be needed to reflect more definitive site allocations within Local Plans and to allow widen the scope of the policy to assess changes of use from employment land to uses other than housing. |
| HOU1 Delivering Sustainable Housing Growth | Major | To reflect new evidence on housing need across the Black Country. |
| HOU2 Housing Density, Type and Accessibility | Minor (Potentially Major) | To ensure the policy is consistent with emerging national policy |
| HOU3 Delivering Affordable Housing | Major | To reflect changes to national policy and reflect new evidence regarding affordable housing needs |
| HOU4 Accommodation for Gypsies, Travellers and Travelling Showpeople | Major | To reflect new evidence of needs for this type of accommodation. |
| HOU5 Education and Health Care Facilities | Minor (Potentially Major) | To review the requirement for alternative provision when a facility is lost. Potential to broaden the policy to secure such infrastructure to serve major housing developments. |
| EMP1 Providing for Economic Growth and Jobs | Major | Revised targets to reflect up-to-date evidence of need and supply. Potential changes to criteria and definitions. |
| EMP2 Actual and Potential Strategic High Quality Employment Areas | Major | Revised targets to reflect up-to-date evidence of need and supply. Potential changes to criteria and definitions. |
| EMP3 Local Quality Employment Areas | Major | Revised targets to reflect up-to-date evidence of need and supply. Potential changes to criteria and definitions. |
| EMP4 Maintaining a Supply of Readily Available Employment Land | Potentially Major | Potential changes to reflect a portfolio based approach. |
| EMP5 Improving Access to the Labour Market | Potentially Minor | Minor change to allow for use of planning conditions. |
| EMP6 Cultural Facilities and the Visitor Economy | Minor | Update to lists of attractions and facilities to reflect current priorities. |
| CEN1 The Importance of the Black Country Centres for the Regeneration Strategy | Minor | Potential to merge this policy with CEN2. |
| CEN2 Hierarchy of Centres | Minor | Potential to merge this Policy with CEN1 |
| CEN3 Growth in the Strategic Centres | Potentially Major | Criteria, targets and thresholds may be revised based on new and emerging evidence |
| CEN4 Regeneration of Town Centres | Potentially Major | Criteria and thresholds may be revised based on new and emerging evidence |
| CEN5 District and | Minor | Some minor change to thresholds may be required depending on |

| Local Centres | | new emerging evidence |
|---|---|---|
| CEN6 Meeting Local Needs for Shopping and Services | Potentially Major | Criteria and thresholds may be revised based on new and emerging evidence |
| CEN7 Controlling Out-of-Centre Development | Potentially Major | Criteria may be revised based on new and emerging evidence |
| CEN8 Car Parking in Centres | Minor | Some minor changes may be required resulting from changes to other relevant policies |
| TRAN1 Priorities for the Development of the Transport Network | Minor (Potentially Major) | To reflect the proposed changes to the priorities for the development of the transport network and accessibility standards. |
| TRAN2 Managing Transport Impacts of New Development | Minor | Policy wording anticipated to remain very similar. |
| TRAN3 The Efficient Movement of Freight | Minor | Policy wording anticipated to remain very similar. |
| TRAN4 Creating Coherent Networks for Cycling and Walking | Minor | Policy wording anticipated to remain very similar. |
| TRAN5 Influencing the Demand for Travel and Travel Choices | Minor (Potentially Major) | The criteria based approach will need to be reworded/updated going forward. |
| ENV1 Nature Conservation | Minor | Policy updated to be consistent with national policy. |
| ENV2 Historic Character and Local Distinctiveness | Minor | Policy updated to reflect latest national policy and guidance, particularly in relation to Design and Access Statements. |
| ENV3 Design Quality | Potentially Major | Policy updated to reflect changes to housing standards at a national level. Policy could look to introduce standards for water consumption, access and space |
| ENV4 Canals | Minor | Overall approach in policy to remain unchanged but references to specific canal schemes could be removed. |
| ENV5 Flood Risk, Sustainable Drainage Systems and Urban Heat Island | Minor | Amendments to reflect most recent national guidance and to strengthen policy wording. |
| ENV6 Open Space, Sport and Recreation | Minor | Update some references in the policy and supporting text to reflect changing circumstances |
| ENV7 Renewable Energy | Potentially Major | Possible changes to provide flexibility for non-domestic buildings and changes to the 10% requirement. |
| ENV8 Air Quality | Minor | Changes to reflect the approach in the adopted Black Country Air Quality SPD |
| WM1 Sustainable Waste and Resource Management | Minor | Policy approach maintained but figures will be updated to reflect new evidence |
| WM2 Protecting and Enhancing existing waste | Minor | Policy approach maintained and new evidence will update the identified strategic waste management sites. |

| | | |
|---|---|---|
| management capacity | | |
| WM3 Strategic Waste Management proposals | Minor | Policy approach maintained but references to specific sites will be updated to reflect changes in circumstances, new evidence and Local Plans |
| WM4 Locational Considerations for new waste facilities | None | The policy has been successful in raising the quality of new waste facilities across the Black Country |
| WM5 Resource Management and New Development | None | Policy provides an appropriate level of control over resource management for new developments |
| MIN1 Managing and Safeguarding Mineral Resources | Potentially Major | Policy to be updated to reflect new evidence and a proposed change to the prior extraction threshold for sites within the green belt |
| MIN2 Production of Aggregate Minerals | Minor | Updated to reflect the recent evidence from Local Plans and other new evidence. |
| MIN3 Maintaining Supplies of Brick Clay | Minor | Updated to reflect the recent evidence from Local Plans and other new evidence. |
| MIN4 Exploitation of other mineral resources | Minor | Updated to reflect the recent evidence from Local Plans and other new evidence. Possible reference to fracking |
| MIN5 New Proposals for Minerals Development | None | Policy considered to identify all of the key issues that need to be addressed in relation to new mineral developments |

These Policy areas are discussed in detail in turn below.

## Policy Area A - Health and Wellbeing

6.5    The Core Strategy has a key role in improving health and wellbeing.  Developing strong, healthy and vibrant communities is vital to ensuring the wellbeing of the Black Country's population.  The existing Core Strategy does not have a specific 'Health and Wellbeing section' – instead, these issues are addressed through the set of thematic policies which together address many health and wellbeing issues.

6.6    Since the adoption of the Core Strategy there has been much research and guidance produced on ways of improving health and wellbeing through spatial planning and place-making.  Health professionals and planners are adopting a more collaborative and holistic approach to encourage healthier lifestyles, minimise health inequalities and prevent ill health, through a well-designed built environment. Planning policies that contribute towards healthier communities, for example by introducing standards for developers, can allow health to be built into the environment at the earliest possible stage. This is often referred to as 'designing in health', in the same way that crime can be 'designed out'.  This can be as important as investment in healthcare, as healthcare treats the symptoms, whereas planning can help address the causes of health inequalities and poor health.  The key ways in which the physical environment can influence health is summarised in Figure 10 below.

**Figure 10**    **The relationship between the physical environment and health and wellbeing** (Dudley MBC Planning for Health SPD)



6.7    If communities and households have access to facilities and services, healthy food choices, local employment opportunities, active transport options and well-designed public open space, they will be happier, healthier and more resilient in terms of physical and mental health.  It has also been shown that developments which meet a certain quality design standard can help prevent ill health, creating a "health premium".  Local planning policies, and

the selection of locations for new developments and facilities, should enable people to have a choice of high quality and attractive places to live and allow them to reach the services they need by sustainable forms of transport, enabling the healthier choice to be the easiest choice.

6.8     The most common health inequalities in the Black Country relate to obesity and inactivity, which are well above the national average for both adults and children.  These are framed against an ageing population, with social exclusion also a prominent issue.  Alcohol related harm and problem debt are also major issues.  These inequalities and issues should be at the forefront of decision making to improve health and wellbeing through strategic planning.

6.9     In the adopted Core Strategy, and other Local Plan documents, there are many policies which promote health and have a positive impact on health across the Black Country.  These include policies relating to protection of employment land, increasing environmental infrastructure, improving air quality, promoting sustainable transport and enabling active travel, providing more affordable housing and ensuring sustainable and quick access to residential services. The Core Strategy is a regeneration strategy that provides homes and jobs, which are key to the health and wellbeing of communities.  One fundamental way that the Core Strategy helps to address health and wellbeing inequalities is by providing employment opportunities and securing economic security for the communities of the Black Country.  The Core Strategy Review will consider ways to strengthen health promotion further, focusing on four main themes which embody the strategic links between planning and health:

6.10    *Theme 1 - Location and accessibility of healthcare and community facilities*

6.11    Accessibility to health care and community facilities must be addressed in terms of location and physical access. Car ownership levels decrease with age and are low for younger families, young people in lower income groups and the unemployed.  A large percentage of the Black Country's ageing population rely on living within easy walking distance of healthcare services or at least having regular, reliable access to such facilities. It is therefore important to locate new homes in areas with good access to existing healthcare and community services or where new, sustainable facilities can be created to serve new development.

6.12    *Theme 2 - Planning for active lifestyles*

6.13    Providing an appropriate quality, quantity and variety of open space, including parks, natural areas and allotments, and sport and recreation facilities, is key to achieving better health and wellbeing for the population. As well as encouraging physical activity, access to open space, sports and other recreation facilities promotes relaxation and reduction in stress for those living nearby, and can also bring about social interaction within communities, including for people who feel excluded.  The provision of open space and other publicly managed facilities needs to be considered in the context of increased financial pressures and the need for alternative funding and management solutions.

6.14    *Theme 3 - Designing for safety and wellbeing*

6.15    Social exclusion can be reduced by effective design solutions which integrate well maintained public spaces, community facilities, shops and parks into the surrounding development. Well designed places can also help to reduce the circumstances and opportunity for crime and

increase public confidence and security. The design of places also needs to take account of transport which has a direct impact on health and safety. Air pollution, noise, traffic and congestion all have a negative impact on people's ability to use their environment and major transport routes can act as barriers between and around communities. Walking and cycling, which are sustainable and active forms of transport, need to be given priority.

6.16    ***Theme 4 - Life stages, equality and inclusion***

6.17    The role of spatial planning and public health is to support people and give them the independence they need to live in good health throughout their life. Children and young people need opportunities for sport and recreation and places where they can interact socially with their peers. As they become older, job and training opportunities need to be available and accessible. Every person should have easy access to community facilities and the services they may require throughout all stages of their life. As people progress into later life, daily requirements will change and it is essential that residential areas are designed to reflect this, enabling people to continue to live in the places they are familiar with and in which they have developed social networks, family ties and a sense of belonging. Ideally, new communities and developments should reflect all of these factors, so that developments are built to a standard that allows genuine inclusivity.

6.18    **Developing and Using the Health Evidence Base**

6.19    ***Joint Strategic Needs Assessment (JSNA)***

6.20    Each Black Country Local Authority has a Joint Strategic Needs Assessment (JSNA) which identifies priorities based on the needs of the population. These needs are numerous and relate to the wide breadth of health determinants. They are used to inform commissioning intentions and inform the Health and Wellbeing Strategy for each local area.

6.21    ***Joint Health and Wellbeing Strategy (JHWS)***

6.22    Each Local Authority Health and Wellbeing Board produces a Joint Health and Wellbeing Strategy which aims to improve the health and wellbeing of their population and reduce inequalities through actions affecting the wider determinants of health e.g. housing, education, regeneration, planning, environment and resilient communities.

6.23    ***Health Impact Assessment (HIA)***

6.24    A Health Impact Assessment (HIA) is a tool that enables Health and Wellbeing Boards and Local Planning Authorities to assess what impact a change of policy or new development, service or strategy will have on the health of the local population. Undertaking an HIA produces information on how negative impacts on health can be reduced and positive health gains can be encouraged. The HIA can also identify the different groups which will experience health gains or losses. HIA's can be carried out at any stage in the development process but are best undertaken at the earliest stage possible.

6.25    As part of the Core Strategy review, HIAs will be of value in assessing the impact of larger housing sites, where sustainable and active transport links, access to services, air quality,

noise and neighbourhood amenity, social cohesion, housing quality and design and environmental quality will be key factors. Health impacts will also be taken into account through the Sustainability Appraisal process, with an assessment of population-level place-based health determinants presented in a Health and Wellbeing Technical Paper, which forms part of the evidence base for this Topic Area.

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

**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?**

**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**

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

## Policy Area B - Creating Sustainable Communities in the Black Country

6.26    The Policies in the Creating Sustainable Communities section of the existing Core Strategy set out the housing target for the Plan period and where and when this housing will be delivered. They set out the framework for site allocation documents and area actions plans to make housing allocations, including appropriate accessibility standards and density levels, affordable housing requirements and the amount of gypsy and traveller accommodation required. The strategic approach to education, health care facilities and other infrastructure that is needed to serve existing and new housing development is also established

6.27    The broad scope of the Policies in this section remain appropriate to be carried forward into the Review.

6.28    **Policy HOU1 - Housing Land Supply**

6.29    Policy HOU1: Delivering Sustainable Housing Growth, together with Tables 5, 6 and 7 and the Housing Trajectory, set out housing targets for the current Core Strategy Plan period (2006-26) and how and when these will be met, both within and outside the Growth Network. Appendix C: Black Country Monitoring Summary sets out progress made during 2006-16 towards meeting these targets, and Appendix B sets out a housing trajectory for the period 2016-26, based on current sources of housing supply set out in up-to-date SHLAAs for the four authorities.

6.30    As explained in Part 3, the housing target for the new Plan period (2014-36) will be established through the review, based on need and the availability and deliverability of new sources of housing land supply. It is proposed to update Policy HOU1 and detailed housing figures throughout the Core Strategy once this process is complete. This will include: re-profiling the distribution of development set out in Table 1; changing the proportion to be built on previously developed land; and possible phasing to ensure that brownfield regeneration is prioritised.

6.31    The Core Strategy identified a supply in excess of need to allow for the likelihood that some of the supply would not be delivered during the plan period, by applying a discount of 10% for allocated sites and 15% for broad locations. However, since adoption of the Core Strategy, detailed work has been undertaken as part of the preparation of site allocation documents and area action plans to understand the sites within the growth network, providing greater certainty regarding delivery. It is therefore proposed to reduce the levels of discount applied to these locations.

6.32    When the Core Strategy was adopted it was predicted that significant housing loss would take place through demolitions focussed in housing renewal hubs. However, although investment has taken place and will continue within housing market intervention areas, this has not involved large-scale demolitions. Therefore it is proposed to revise the expected contribution to the land supply of housing renewal hubs and to revisit and update their locations.

6.33    The housing supply included a small site windfall allowance, which was supported in the Core Strategy Inspector's Report. This is the contribution that is expected to come from sites which are

too small to allocate in Local Plans. This allowance has since been supported by monitoring information and changes to national policy - which now allows a windfall allowance to be made in the five year supply. Therefore it is proposed to include an up-to-date small site windfall estimate of 505 per year in the housing supply for the review Core Strategy. It is proposed that the threshold for small sites should be sites for fewer than 10 homes or smaller than 0.25 ha, in line with the Housing White Paper 2017.

6.34    Potential has also been identified to increase high density housing allocations within Strategic Centres, particularly in Walsall, which currently has a low housing target and where the emerging AAP proposes to reduce the new office floorspace target, providing flexibility for other uses in the longer term.

6.35    If these sources of supply prove to be of strategic significance it is proposed to include them in the housing supply for the review Core Strategy.

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

6.36    **Policy HOU 2 - Housing Density, Type and Accessibility**

6.37    Policy HOU2: Housing Density, Type and Accessibility sets a framework for determining the most appropriate house type mix at a local level. The Policy introduced an approach to density on larger housing sites which is based on accessibility by sustainable transport to residential services. The Policy also sets a net density range of between 35 dwellings per hectare and 60 dwellings per hectare for the majority of sites. The Policy is in line with consultation proposals in the Housing White Paper 2017 to introduce minimum density standards and to promote the development of previously developed land and land surrounding transport hubs. However the threshold used in the Policy, of 15 homes or more, is inconsistent with those used in the Housing White Paper and the NPPF.

6.38    As evidenced in the Housing Background Report, the majority of housing built since 2011 has accorded with the density and accessibility requirements of the Policy. However, it has proved difficult for Local Plan documents to prescribe the density and house type mix for each site allocation, as required by the final paragraph of the Policy, therefore it is proposed to remove this paragraph from the Policy.

6.39    Looking to the future, the standards may not apply equally well to green belt release locations, and in particular to urban extensions. In line with proposals in the Housing White Paper, it is important that such locations are chosen on the basis of good walking or public transport access to residential services, however achieving high levels of access may be more difficult to achieve on the urban fringe.

6.40    Para 3.11 sets out the broad mix of homes to be provided to meet the needs of different sizes of household. The Black Country and South Staffordshire Strategic Housing Market Assessment (SHMA) 2017 provides guidance on the likely needs of different groups for housing over the new Plan period. This concludes that, given the nature of the existing housing stock, the optimum mix overall would be: 12% 1 bed; 22% 2 bed; 40% 3 bed; and 26% 4 bed properties, although this

would vary by area and tenure.  The SHMA also provides guidance on the needs of certain groups for housing, including the elderly and families with children.  In particular the SHMA highlights a need for 162 new sheltered and extra care homes every year to meet the needs of older persons – 5% of the total housing need.

---

**Question 36 - If you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed, what standards should be applied instead, for example should the minimum net density of 35 dph be increased to maximise brownfield housing delivery?**

---

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

---

**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?**

---

**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.**

---

**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?**

6.41    Local authorities are now required to identify the level of demand for self and custom build housing in their area by setting up a register, and to take account of demand when preparing a local plan. The review should therefore consider if and how to take account of demand for self and custom build housing in the Core Strategy.

6.42    There are currently only nine records on self and custom build registers in the Black Country. Therefore, it may be possible for such small-scale need to be met through local policies and allocations, rather than through a specific policy in the Core Strategy.

6.43    If a policy approach was required, one option would be to set a target for each authority to allocate smaller sites to provide for the requirements of those on local authority self and custom house-building registers.  An alternative would be to introduce a Core Strategy policy requiring larger housing sites to provide a proportion of serviced plots for self and custom build housing. Under both options, subsidising the provision of serviced plots is unlikely to be viable on brownfield sites in the urban area, but may be deliverable on greenfield sites outside the urban area.

6.44    The development of Houses in Multiple Occupation (HMOs) in parts of the Black Country has become an issue in recent years as this type of accommodation sometimes raises local concerns relating to matters such as amenity space and parking.  National guidance supports addressing these issues through local approaches, including the use of Article 4 Directions, which are based on local evidence.

> **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:**
> **Question 41b - A target for each authority? Yes/No**
> **Please explain why**
> **Question 41c – A requirement for large housing sites to provide serviced plots; Yes/No**
> **Question 41d  Another approach altogether? Yes/No**
> **Please specify**
> **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**

## Policy HOU3 - Affordable Housing

6.45    Policy HOU3: Delivering Affordable Housing set out a target for affordable housing provision over the Plan period based on need set out in the 2008 SHMA.  The aim was to provide at least 550 new affordable homes per year, through grant funded schemes and by securing 25% affordable housing on private housing sites of 15 homes or more, where viable.  This target was significantly exceeded during 2009-2015, with 1045 new affordable homes provided per year on average, the majority grant funded.

6.46    The 2017 SHMA has updated housing need information and suggests that the affordable housing target should be higher, at 23.4% of total housing need or 832 homes per year.  Looking at historic trends this should be deliverable, although this does depend on levels of grant funding available in future.

6.47    The Housing and Planning Act 2016 introduced starter homes as a new housing product for 23-40 year old first time buyers, to be sold on at a discount of at least 20% below market value for 15 years.  The Act requires planning authorities to promote the supply of starter homes and allows a starter homes requirement to be set in local plans.  Starter homes will at some point be classified as affordable housing through a change to the NPPF.  However, the SHMA states that, in the Black Country, starter homes are not priced below entry-level market housing and are therefore not genuinely affordable within existing criteria.  The SHMA sets out a separate estimate of the need for starter homes over the Plan period – 5.3% of total housing need, or 188 homes per year.  Starter homes are likely to be cheaper for developers to provide than other affordable tenures, depending on detailed requirements which will be set out in regulations.

6.48    The Housing White Paper has since clarified that there will not be a statutory requirement to provide starter homes, but instead there may be a requirement for sites of more than 10 homes to provide 10% affordable home ownership, including starter homes and shared ownership products.  This threshold is inconsistent with the 15 home threshold used in Policy HOU3.  In

addition, this requirement would reduce the ability of Policy HOU3 to deliver affordable rent products in line with local need.

6.49 In light of these factors, options need to be explored to increase affordable housing delivery on private sites. One option would be to increase the overall affordable housing proportion in Policy HOU3, therefore requiring developers to provide affordable home ownership products plus an appropriate proportion of other affordable tenures. It may not be possible to secure this target on some sites due to viability. However, this is currently the case when applying the 25% requirement, as explained in para 3.15 of the Core Strategy.

6.50 Another option would be to reduce the eligible site threshold to over 10 homes or 1,000 sqm gross floorspace, in line with national guidance (NPPG para 31). A further option would be to introduce an increased affordable housing requirement for green belt release sites, where such an increase is likely to be financially viable.

**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?**

**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**
**Question 43b – If no, should it be reduced to 11 homes or more? Yes/No**
**Question 43c – If answered no to 43b, what threshold should be used?**

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

**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?**

**Policy HOU4 - Accommodation for Gypsies, Travellers and Travelling Showpeople**

6.51 Policy HOU4 sets out indicative targets for gypsy and traveller pitches, travelling showpeople plots and transit pitches between 2008 and 2018. Site allocation documents and area action plans have since allocated some sites to contribute towards meeting these targets and a number of windfall sites have come forward. It is expected that the majority of new provision will be privately funded. Such sites are likely to be designed for single families and therefore smaller than local

authority sites. Smaller sites are more likely to arise as windfalls, as has taken place in recent years.

6.52 A new Black Country and South Staffordshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) has been undertaken, in line with current national guidance, which has produced new targets for each authority for the period 2016-36 as set out in Tables 4 and 5. It is proposed to use the new targets to replace those in Core Strategy Table 9. The GTAA recommends that provision of transit sites or stopping places is explored, but proposes no specific targets for such provision. Such sites address short term issues and are best addressed through enforcement and police action, and the local authorities are working with the police to deliver transit sites and stopping places where appropriate. Therefore it is proposed to remove the transit site target from Core Strategy Table 9.

**Table 4        Requirement for Gypsy and Traveller Residential Pitches (Black Country and South Staffordshire GTAA, 2017)**

| Local Authority | Existing pitches 2016 | Need 2016-21 | Need 2021-26 | Need 2026-31 | Need 2031-36 | Total need 2016-36 |
|---|---|---|---|---|---|---|
| Dudley | 47 | 11 | 4 | 5 | 5 | 25 |
| Sandwell | 16 | -1 | 1 | 1 | 1 | 2 |
| Walsall | 40 | 15 | 4 | 5 | 5 | 29 |
| Wolverhampton | 43 | 2 | 3 | 4 | 4 | 13 |
| **Black Country** | **146** | **27** | **12** | **15** | **15** | **69** |

**Table 5        Requirement for Travelling Showpeople Plots (Black Country and South Staffordshire GTAA, 2017)**

| Local Authority | Existing plots 2016 | Need 2016-21 | Need 2021-26 | Need 2026-31 | Need 2031-36 | Total need 2016-36 |
|---|---|---|---|---|---|---|
| Dudley | 12 | 8 | 2 | 2 | 2 | 14 |
| Sandwell | 15 | 5 | 2 | 2 | 2 | 11 |
| Walsall | 66 | 15 | 6 | 7 | 7 | 35 |
| Wolverhampton | 3 | 0 | 0 | 0 | 0 | 0 |
| **Black Country** | **96** | **28** | **10** | **11** | **11** | **60** |

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

**Policy HOU5 - Education and Health Care Facilities**

6.53 Policy HOU5 aims to protect existing networks of education and health care facilities and sets out locational criteria for new health care and education facilities. The public sector now has a significantly reduced role in direct provision and strategic planning for such facilities and it is increasingly difficult to ensure that alternative provision is secured when an existing facility is lost.

6.54    Since 2011 parts of the Black Country have seen significant investment in the school estate (through the former Building Schools for the Future programme, the Primary School Programme and expansions funded by local authorities) and in further and higher education investment (e.g. University of Wolverhampton).  However, a national baby boom has significantly increased the need for new primary school places, which is now working through to secondary schools and is placing pressure on the school estate.

6.55    The funding regime for education and health has changed since 2011 with funding for education now being channelled through the Education Funding Agency rather than through local authorities. The Government expects all new schools to be academies or free schools.  This makes it harder for local authorities to direct the provision of new or expanded schools to locations where there is existing need or need as a result of housing growth.  Most health provision at the local level is also now commissioned through clinical commissioning groups.

6.56    Community Infrastructure Levy (CIL) has been  adopted in Dudley and Sandwell, and is proposed in Walsall. Need a brief comment on Wolverhampton's approach – Ian?  However, the viability of development in much of the Black Country limits the amount of CIL that can be raised and there are competing infrastructure demands, so CIL cannot provide sufficient sums to wholly fund new education and health care facilities and running costs.

6.57    It is anticipated that Policy HOU5 will have a criteria based approach to making service providers demonstrate why health care and education facilities are no longer required or viable.  Given the potential need for new and improved social infrastructure to serve new large housing developments, as identified in Part 5, there may be merit in expanding the scope of Policy HOU5 to cover other types of built social infrastructure, such as community meeting places, and to set out standards in the Policy to ensure that new communities are well served?

**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**

**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.**

## Policy Area C - The Black Country Economy

6.58   The employment land policies of the Core Strategy seek to ensure that a sufficient stock of employment land is available to meet demand and support the growth and diversification of the economy. At the heart of these Policies is a recognition of the need for a step-change in the quality of the employment land offer in order to attract growth sector high technology and logistics sector businesses.  Areas of vacant or underused poor quality employment land which are incapable of accommodating future economic uses are proposed for release to other uses, especially housing.

6.59   The broad scope of the Policies in this section remain appropriate to be carried forward into the Review.  However, some of the individual policies may need updating as discussed below. Policy DEL2, which seeks to control the release of employment land to alternative uses, especially housing, has also been included.

6.60   **Policy DEL2 – Managing the Balance between Employment Land and Housing**

6.61   This policy essentially manages the release of poorer quality employment land, primarily Local Quality Employment Land, for housing.  It distinguishes between employment areas which are allocated for potential release for new housing and other employment areas, notably those areas which have been safeguarded for employment uses. The Policy is useful in enabling the appropriate delivery and phasing of new housing development on brownfield, former employment sites to meet a number of overarching objectives of the Core Strategy.

6.62   Issues have been identified in the application of this policy, e.g. can it be reasonably applied in the assessment of proposals for the change of use of employment land to uses other than housing, and is there a need for this policy when a site allocation on an employment area (determining whether it should be safeguarded for employment uses or potentially be released for housing) can be considered more determinant?  However, not all of the employment land within the Black Country currently has been categorised along these lines, and there is an argument that there is still a need to manage the release of employment land sites where this is considered appropriate.

> **Question 49a – Is there is 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**
> **Question 49b - If yes, should this policy be used to assess the release of employment land to alternative uses, other than housing? Yes/No**
> **Please explain why**

**Policy EMP1 – Providing for Economic Growth and Jobs**

6.63   In order to support the delivery of these priorities, the Core Strategy distinguishes between Strategic High Quality Employment Land and Local Quality Employment Land, and quantifies how much occupied land (i.e. currently used for economic activity) should be provided in each category.  This 'stock' approach is unusual as most development plans seek to quantify additional employment land needs only and do not establish how much land should be used

to accommodate existing jobs. The overall employment land requirement is set out in Policy EMP1.

6.64 Policy EMP2 of the Core Strategy proposes a major uplift in the amount of Strategic High Quality Employment Land resulting from a combination of firstly the bringing forward of new sites and secondly investment in underperforming existing employment areas (Potential Strategic High Quality Employment Land). Policy EMP3 explains that the amount of Local Quality Employment Land is proposed to reduce as a result of the anticipated contraction in some traditional 'land hungry' employment sectors.

6.65 The overall effect of Policies EMP2 and EMP3 is that the total stock of employment land within the Black Country is proposed to contract from 3,565ha in 2009 to 3,392ha in 2016 and 2,754ha in 2026.

6.66 Monitoring and evidence collected to support the preparation of Area Action Plans and Site Allocations Documents has shown that the employment land stock has proved to be more resilient than envisaged when the Core Strategy evidence base was being prepared in 2008-09. This is due to a number of factors, including an ongoing and increasing demand for sites and premises associated with a resurgence in manufacturing coupled with a deficit in supply. Evidence also shows that many of the existing employment areas that were identified for potential release to housing are in multiple ownership and have high remediation costs, making them difficult to bring forward for redevelopment. The effect of these trends has been that, although the stock of Local Quality Employment Land contracted by 394 ha between 2009 and 2016, this contraction was 146 ha less than anticipated in Policy EMP3.

6.67 Performance against the delivery of the Strategic High Quality Employment Land targets has been mixed. In 2016, monitoring shows that there is some 641 ha of Strategic High Quality Employment Land in the Black Country with a further 109 ha in South Staffordshire. This total is 155 ha short of the target in Policy EMP2. However, the development of sites in South Staffordshire has been quicker than expected, delivering the total target for 2026 by 2016. Over 60 ha of additional sites which have the potential to meet Black Country needs are now being taken forward through the South Staffordshire Site Allocations Document.

6.68 The overall impact of more resilient Local Employment Areas combined with slightly disappointing performance against High Quality Employment Land targets is that the overall stock of employment land in the Black Country has fallen to 3,335 ha in 2016, broadly equivalent to the target in Policy EMP1.

6.69 The EDNA recommends a change in approach from the existing Core Strategy and that the Black Country should be planning for a net uplift in employment land in the review. The Study shows that, in order to plan for a resurgent manufacturing sector in particular, up to an additional 800ha of employment land is required for the period to 2036.

> **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**
> **Do you think that distinguishing between Strategic High Quality Employment Areas and Local Quality Employment Areas is still appropriate? Yes/No**

**Policy EMP2– Strategic High Quality Employment Land and Policy EMP3 – Local Quality Employment Land**

6.70    The Core Strategy seeks to safeguard the best quality employment land for those uses that are most able to contribute towards the growth and diversification of the economy. Currently EMP2 identifies Strategic High Quality Employment Land as being characterised by excellent accessibility, high quality environment and clusters of high technology based sectors. Within these areas, new development is restricted to primarily manufacturing and logistics uses within Use Classes B1(b)(c), B2 and B8.

6.71    The EDNA advises that retaining this Policy approach will continue to give due prominence to high quality export led advanced manufacturing which has an important role to play in the rebalancing of the UK economy. However, the existing Black Country Strategic High Quality Employment Areas contain a wide mix of uses and activities, and the existing definition cuts across the conventional planning use classes and so it is possible for a High Quality employment use to change to a Local Quality employment use without the need for planning permission.

6.72    Local Quality Employment Areas are characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees. These areas provide for manufacturing and warehousing activity but also other uses that need to be accommodated on industrial land as they play a significant part of the area's economy, waste management and scrap metal, trade wholesale, construction, haulage/transfer depots and the motor trade.

6.73    The EDNA recommends that the Core Strategy should continue to focus these activities into particular areas so as not to compromise the quality of Strategic High Quality Employment Areas. However, in some cases, business operating in these sectors are associated with leading edge technology and require high specification, well located premises. Restricting such operations to Local Quality Employment Areas could be seen to be an overly restrictive approach in these circumstances.

**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?**

**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?**

**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?**

**Policy EMP4 – Maintaining a supply of readily available employment land**

6.74    Policy EMP4 is intended to aid industrial development by maintaining a constant reservoir of readily available land that is 'shovel ready'.  However, it has proved difficult for the Black Country Authorities to reach this target due to the challenges of bringing forward sites associated with abnormal ground conditions and low rental / capital values.  Employment sites often have long lead in times and the concept of 'shovel ready', though well intentioned, does not reflect the land development process in the Black Country.

6.75    The approach could also be seen to be too broad-brush in nature - it is based on a single quantum of land rather than what size, type or quality of sites is needed.  So it is feasible that the total quantitative requirement could be met but this may be made up of a large number of sites which are too small to meet the needs of modern industry.

6.76    The EDNA advises that Policy EMP4 is subject to significant amendment and that there should be a move towards an approach which requires the provision of a balanced portfolio of sites rather than a simple arithmetic figure.

> **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?**

**Policy EMP5 – Improving access to the labour market**

6.77    Policy EMP5 encourages the use of planning obligations to be negotiated with the developers / owners of major, new job creating developments to secure initiatives and / or contributions towards the recruitment and training of local people.

6.78    It is important to retain this Policy in order that the jobs created in new and existing sectors of the economy can be made available to as many existing residents as possible.  However, it would be useful to clarify that such contributions can be secured through planning conditions as well as through section 106 agreements.

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

**Policy EMP6 – Cultural Facilities and the Visitor Economy**

6.79    Policy EMP6 sets out priorities for developing and enhancing the visitor economy and other cultural facilities across the Black Country.  It is proposed to update the lists of attractions and facilities which are listed in the Policy, in line with current priorities.

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

**Policy Area D - The Black Country Centres**

6.80    The Core Strategy seeks to maintain strong and competitive strategic centres that will be the focus for retail, commercial and other development and sets out the amount of retail and office development planned for up to 2026.  The existing Policies are based on the following objective:

6.81    *'The unique character of the Black Country is largely defined by its network of centres and the relationships between them. This provides the basic spatial structure for the sub-region and is reflected in the 3 elements of the Vision. The Policies for Centres will ensure the network of Black Country Centres are consolidated, maintained and enhanced and will contribute to the delivery of Spatial Objectives 1, 2, 5, 7 and 8.'*

6.82    The broad scope of the Policies in this section remain appropriate to be carried forward into the Review.  However, some of the individual policies may need updating as discussed below.

**Policy CEN1: The Importance of the Black Country Centres for the Regeneration Strategy**

6.83    The unique character of the Black Country is largely defined by its network of centres and the relationship between them. They are the focus for retail, leisure, commercial, community and civic uses.  They provide the most accessible locations for public services, such as health and education facilities.  The strategy is to maintain and enhance these centres in a manner appropriate to their role and function in the hierarchy, in order to deliver economic growth and support a viable network of centres to meet the needs of Black Country residents.

**Policy CEN2: Hierarchy of Centres**

6.84    The adopted Core Strategy sets out a hierarchy of centres so that investment in town centre uses of an appropriate scale are promoted. *"Main Town Centre Uses"* are those uses contained in the *NPPF, Annex 2: Glossary*[1]. To maximise regeneration to protect the identified centres and ensure the sustainable distribution of investment, a hierarchy of centres, consisting of three levels, has been identified across the Black Country:

6.85    **Strategic Centres**. The Strategic Centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton will provide the main focus for comparison *(clothes, white goods etc)* shopping, office employment, large scale leisure and cultural facilities in the Black Country.
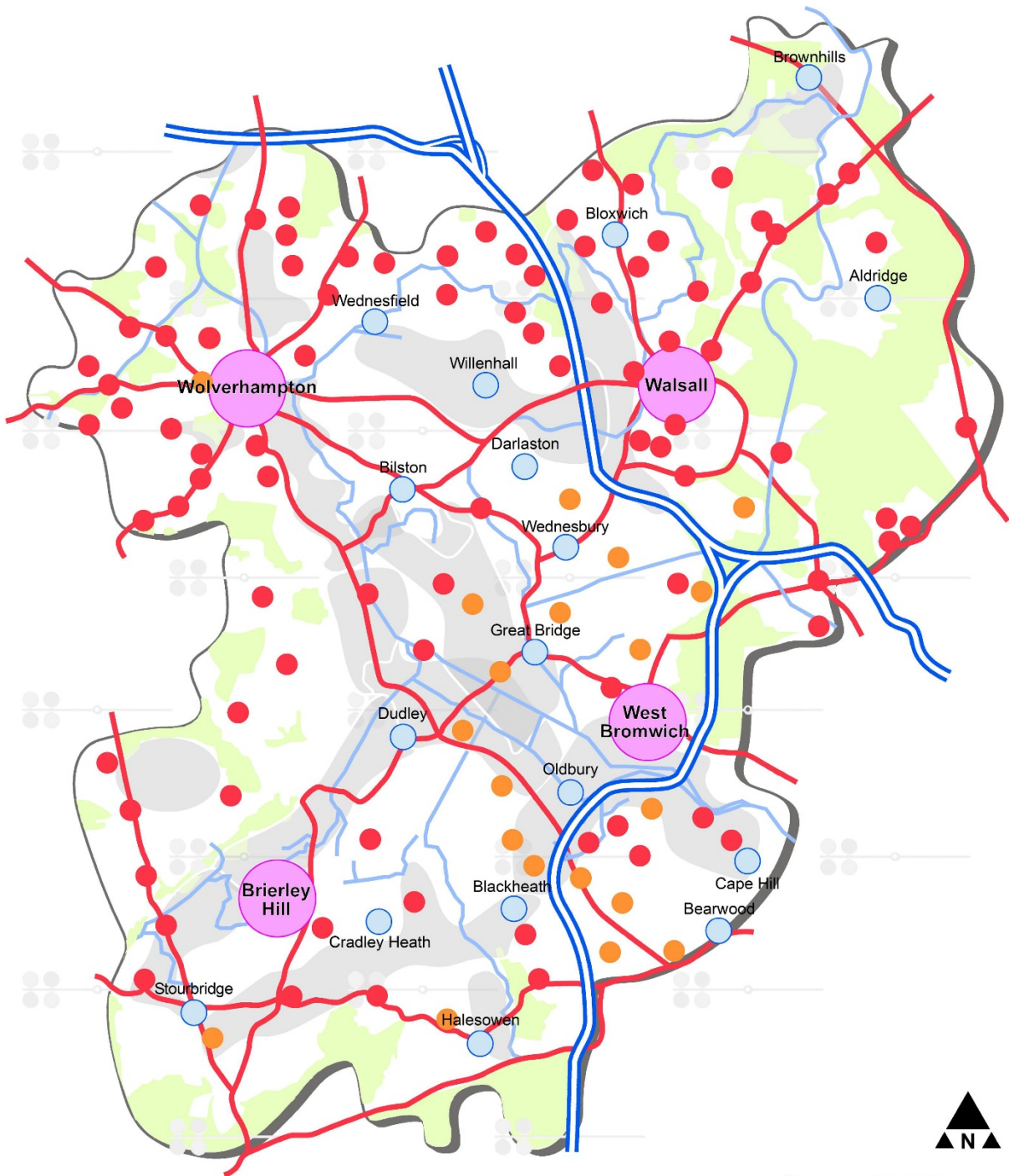
---

[1] *Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*

6.86 **Town Centres**[2] The Black Country Town Centres will complement the Strategic Centres and perform a more reduced shopping and business role but remain an important focus for day-to-day shopping *(particularly convenience –'food shopping)*, leisure, community and cultural activity. The town centres are characterised by being served by at least one anchor supermarket.

6.87 **District and Local Centres**. These Centres vary in scale but all portray characteristics that provide for day-to-day convenience shopping and services to meet local needs.

6.88 Each level in the hierarchy will have a specific policy approach reflecting its scale and function, although it is recognised that within the hierarchy there is a need for the different characteristics of individual centres to be acknowledged. This policy approach is important in helping to ensure that developments are located in a centre that will be most appropriate to the role and function of their scale, nature and catchment area.

6.89 The centres and retail evidence will look at how each of the centres is performing and this could lead to additions to or changes in the hierarchy.  The current hierarchy is set out in Table 6.

---

[2] Walsall Council identifies Town Centres as District Centres in the saved Walsall UDP.

**Figure 11        Black Country Core Strategy Centres Key Diagram - Updated**

**Centres Key Diagram**

Strategic Centres

Town Centres
(inc. Walsall's District Centres)

District and Local Centres

New Local Centres

Canal Network

Regeneration Corridors

Green Belt

Motorway

Major Road Network

©Crown copyright. All rights reserved.
Sandwell MBC Licence No. 100032119 2017

**Table 6    Black Country Core Strategy Hierarchy of Centres - Updated[3]**

| Local Authority | Dudley | Sandwell | Walsall | Wolverhampton |
|---|---|---|---|---|
| Strategic Centres | - Brierley Hill | - West Bromwich | - Walsall | - Wolverhampton |
| Town Centres | - Dudley<br>- Stourbridge<br>- Halesowen | - Blackheath<br>- Cradley Heath<br>- Great Bridge<br>- Oldbury<br>- Wednesbury<br>- Cape Hill<br>- Bearwood | - Bloxwich<br>- Brownhills<br>- Aldridge<br>- Willenhall<br>- Darlaston | - Bilston<br>- Wednesfield |
| District and Local Centres | - Kingswinford<br>- Lye<br>- Sedgley<br>- Amblecote<br>- Cradley / Windmill Hill<br>- Gornal Wood<br>- Netherton<br>- Pensnett<br>- Quaryy Bank<br>- Roseville<br>- Shell Corner<br>- The Stag<br>- Upper Gornal<br>- Wall Heath<br>- Wollaston<br>- Wordsley<br>- Hawne<br>- Oldswinford | - Smethwick High Street<br>- Owen Street, Tipton<br>- Scott Arms<br>- Carter's Green<br>- Quinton<br>- Princess End<br>- Old Hill<br>- Stone Cross<br>- Langley<br>- Hamstead<br>- Rood End<br>- Queens Head – Bristnall<br>- Smethwick High Street (Lower)<br>❖ Brandhall<br>❖ Bristnall<br>❖ Causeway Green<br>❖ Charlemont<br>❖ Crankhall Lane<br>❖ Dudley Port<br>❖ Hagley Road<br>❖ Hill Top<br>❖ Lion Farm<br>❖ St Mark's Road<br>❖ Poplar Rise (City Road)<br>❖ Vicarage Road<br>❖ Tividale<br>❖ West Cross<br>❖ Whiteheath Gate<br>❖ Yew Tree<br>❖ Park Lane | - Caldmore<br>- Stafford Street<br>- Pleck<br>- Pelsall<br>- Leamore<br>- Palfrey<br>- High St Walsall Wood<br>- Rushall<br>- Blakenall<br>- Lane Head<br>- Streetly<br>- Queslett<br>- Lazy Hill<br>- New Invention<br>- Bentley<br>- Park Hall<br>- Moxley<br>- Fullbrook<br>- Collingwood Dr. Pheasey<br>- Birchills<br>- Coalpool / Ryecroft<br>- Beechdale<br>- The butts<br>- Spring Lane<br>- Shelfield<br>- Beacon Road, Pheasey<br>- Brackendale<br>- Woodlands<br>- Shelfield<br>- South Mossley<br>- Dudley Fields<br>- Streets Corner<br>- Buxton Road, Bloxwich<br>- Coppice Farm<br>- Turnberry road, Bloxwich | - Stafford Road (Three Tuns)<br>- Cannock Road (Scotlands)<br>- Tettenhall Village<br>- Whitmore Reans / Avion Centre<br>- Broadway<br>- Bushbury lane<br>- Showell Circus<br>- Wood End<br>- Stubby Lane<br>- Heath Town<br>- Parkfield<br>- Spring Hill<br>- Penn manor<br>- Upper Penn<br>- Penn Fields<br>- Bradmore<br>- Merry Hill<br>- Castlecroft<br>- Finchfield<br>- Tettenhall Wood<br>- Newbridge<br>- Aldersley<br>- Pendeford Park<br>- Fallings Park<br>- Ashmore Park<br>- Compton Village<br>- Warstones Road<br>- Dudley Road (Blakenhall)<br>  o Chapel Ash |

❖ New local centres identified in Sandwell Site Allocations and Delivery DPD (2012)

o New local centre identified in Wolverhampton City Centre Area Action Plen (2016)

---

[3] Through Walsall's emerging Site Allocation Document a new local centre has been identified – Blackwood Local Centre.

**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.**

**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.**

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

**Question 60a - 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**
**Question 60b - If so, do you agree that they should be moved / removed within or out of the hierarchy?**
**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?**

**Policy CEN3: Growth in the Strategic Centres**

6.90   Town centres today are facing a multitude of challenges to their continuing vitality and viability. Many High Streets are characterised by falling retail sales, reduced footfall, increased business failures and rising vacancies. The growth of internet shopping and multi-channel retailing also means that many retailers are actively seeking to reduce rather than increase their store portfolios. There is a need to consider the changing character of the High Street with an increased move towards leisure and service uses within core retail areas, more mixed use schemes and pressure to provide homes to meet future needs and provide a resident population for centres to serve.

6.91   At the same time there is continued competition from existing and new out-of-centre large format retail and mixed use schemes. The quantity of comparison retail, convenience retail and other uses to plan for in the Strategic Centres is therefore a key issue for the Core Strategy. The level of town centre activity and floorspace in the Black Country centres is affected by consumer and businesses trends and the wider economy in ways that will impact on the spending power available. There is also a need to plan for the population and housing growth that is predicted for the Review period up to 2036.

6.92   It is important to strengthen and diversify the Black Country economy. It is believed that concentrating office investment in the Strategic Centres is the best way to build an office market and ensure the viability of centres which provide a balanced range of uses and employment provision. However, monitoring has shown that delivering large scale office development has

been a challenge and it is proposed to reassess the target for office development to take account of recent experiences and future trends.

6.93 Policy CEN3 will be reviewed in the context above and 'The Centres and Retail Evidence' will be updated to assess national trends in main town centre uses, provide realistic floorspace figures to plan for, and comment on the implications for the Black Country's Centres in terms of the existing policy approach, including impact testing thresholds. The policy will also be reviewed in light of the Area Action Plans that have been produced for the Strategic Centres since the adoption of the Core 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**

**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**

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

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

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

**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.**

**Brierley Hill Retail Pre-Conditions**

6.94 The Core Strategy imposed three conditions on new Comparison retail development within Merry Hill (part of Brierley Hill Strategic Centre). Brierley Hill Area Action Plan which was adopted in 2011 translated these into two conditions. The conditions are:

- *Implementation of improvements to public transport, including completion of initiatives of equivalent quality and attractiveness to the proposed Metro extension from Wednesbury to Brierley Hill, and improvements to bus services connecting the centre with other locations in the Black Country and beyond, and other measures to improve accessibility to and circulation within the centre by non-car modes; and*

- *Introduction of a car parking management regime including the use of parking charges compatible with those in the region's network of major centres.*

> **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?**

**Policy CEN4: Regeneration of Town Centres**

6.95    The network of Town Centres in the Black Country provide for convenience (food) and local comparison shopping, local services, community and leisure facilities. The comparison shopping role of many of these centres has declined over the last decade or so and many of the centres do not offer the physical capacity for future major development, and find it difficult to attract significant retail and/or other commercial investment. However, the Core Strategy's potential housing growth options may lead to a need for further convenience shopping and mixed use development in certain town centres once the housing locations are determined.

> **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.**

> **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.**

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

**Policy CEN5: District and Local Centres**

6.96    A network of District and Local Centres provide for day-to-day local shopping and service needs. Many of the centres act as the heart of the local community with community halls, libraries and religious buildings. The majority benefit from good public transport, walking/cycling links and car parking provision.

6.97    The adopted Core Strategy established a 'three level hierarchy of centres' in the Black Country which resulted in the identification of two new Local Centres at Hawne and Oldswinford in Dudley and also the removal of Darlaston Green within Walsall from the hierarchy.  Para 4.33 of the Core Strategy states that the designation of new local centres could come forward through relevant Local Development Documents (such as Area Action Plans and Site Allocation Documents).

6.98    Since adoption of the Core Strategy, the Sandwell Site Allocation Document (SAD) has identified 17 new centres.  Following adoption of the SAD in 2012 these centres have been designated local centres and have therefore been added to the hierarchy.  The Wolverhampton City Centre Area

Action Plan (AAP), adopted in 2016, designated a new local centre at Chapel Ash. Through Walsall's emerging SAD a new local centre has been identified – Blackwood Local Centre. Following the anticipated adoption of the SAD in 2017 this centre will be a recognised established centre in planning policy terms. An updated Core Strategy Hierarchy of Centres is set out in Table 6.

6.99    Detailed boundaries for any proposed new centre and any adjustments made to existing centre boundaries will be delivered through Local Development Documents prepared by each individual local planning authority.

> **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**

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

**The Centres Threshold Approach**

6.100    Reflecting the priority to steer regeneration to the most sustainable locations, development in out-of-centre locations should be carefully managed by policy to avoid undermining the strategy for growth in centres. To ensure this, the policies include a floorspace and threshold approach for the undertaking of impact tests, as set out in Table 7. Development is not precluded above these thresholds, but simply set appropriate local triggers for proportionate testing of proposals to ensure they support balanced growth across the Black Country and do not individually or cumulatively lead to harmful impacts. Policies CEN3-5 set floorspace thresholds for convenience and comparison retail development to ensure retail growth is focused in the appropriate centres according to their level in the hierarchy. In some cases they also provide thresholds for office and other centre uses. Policies CEN6 and CEN7 sets floorspace thresholds for out-of-centre applications.

**Table 7        The Centres Threshold Approach**

| Type of Centre | Area for Application of floorspace thresholds | Assessment Required |
|---|---|---|
| **Strategic Centre** Brierley Hill West Bromwich Walsall Wolverhampton | Comparison retail – in centre proposals | Over 500 sq. metres gross if the proposal would result in the overall targets for comparison retail being exceeded. |
| | Comparison retail – edge of centre proposals | Over 500 sq. metres gross OR for proposals that are below this threshold which are considered to have significant impact on the centres. |
| | Convenience retail – in centre and edge of centre | Over 500 sq. metres net OR for proposals that are below this threshold which are considered to |

| | | |
|---|---|---|
| | | have significant impact on the centres. |
| **Town Centres** See Hierarchy | Comparison retail – In centre for all Town Centres EXCEPT Dudley | Over 500sq metres gross demonstration of appropriate scale |
| | Convenience retail – In centre for all Town Centres EXCEPT Dudley | Over 650 sq metres net demonstration of appropriate scale |
| | Comparison retail – Edge of centre EXCEPT Dudley | Over 500 sq metres gross OR for proposals that are below this threshold which are considered to have significant impact on the centres. |
| | Convenience retail – Edge of centre EXCEPT Dudley | Over 650 sq metres net OR for proposals that are below this threshold which are considered to have significant impact on the centres. |
| | DUDLEY Town Centre only Comparison retail – In Centre | demonstration of appropriate scale if the proposal would result in the overall targets for comparison retail being exceeded (15,000sq metres gross) |
| | Convenience retail – In Centre | demonstration of appropriate scale if the proposal would result in the overall targets for convenience retail being exceeded (5,000 sq metres net) |
| | Comparison retail – Edge of Centre | any proposal if it would result in the overall targets for comparison retail being exceeded (15,000sq metres gross) |
| | Convenience retail – Edge of Centre | any proposal if it would result in the overall targets for convenience retail being exceeded (5,000 sq metres net) |
| | Offices (B1(a)) – In Town Centres | Over 5000 sq metres gross |
| **District & Local Centres** See Hierarchy | Comparison retail; Office (B1(a)); Leisure – In Centre | Over 200 sq metres gross demonstration of appropriate scale |
| | Convenience retail – In Centre | Over 500sq metres net demonstration of appropriate scale |
| | Comparison retail; Office (B1(a)); Leisure – Edge of Centre | Over 200 sq metres gross OR for proposals that are below the threshold but which are considered likely to have a significant impact. |
| | Convenience retail – Edge of centre | Over 500 sq metres net OR for proposals that are below the threshold but which are considered likely to have a significant impact. |

**Strategic Centres**

6.1.1    The strategy for the Strategic Centres proposed large amounts of comparison floorpsace. Therefore impact assessments would only be required for in-centre proposals over 500sqm that would result in these overall targets being exceeded.

6.1.2    Impact assessments are required for any edge of centre comparison retail proposals that exceed 500sqm but also for proposals that are below this threshold which are considered to have a significant impact on the centres.

6.1.3    In terms of convenience retail any proposals for above 500sqm of net floorspace in Strategic Centres require impact assessments, as do edge-of-centre proposals that exceed this threshold. Again impact assessment can be requested for proposals that are below the threshold but which are considered likely to have a significant impact.

**Town Centres**

6.1.4    Individual proposals for above 500sqm comparison retail and above 650sqm net convenience retail in all town centres, other than Dudley, will have to show they are of appropriate scale.

6.1.5    Individual proposals for above 500sqm comparison and 650sqm net convenience retail in edge-of centre locations in all centres other than Dudley will require impact assessments. Impact assessment can be requested for proposals that are below the threshold but which are considered to have a significant impact.

6.1.6    For Dudley in centre proposals that would result in the total amount of additional comparison exceeding 15,000sqm and the total amount of additional convenience floorspace exceeding 5,00sqm net will need to show they are of appropriate scale and edge of centre schemes that result in the total figures being exceeded require impact assessments.

6.1.7    There are also thresholds for offices in town centres to ensure they do not go beyond meeting their local service function and draw investment away from the Strategic Centres. Up to an additional 5,000sqm of gross office B1(a) development is allowed in each town centre with any development exceeding this figure requiring an impact assessment.

**District and Local Centres**

6.1.8    Proposals of up to 500sqm net convenience retail and proposals for comparison, office or leisure uses of up to 200sqm will be permitted where they are shown to be of an appropriate scale. Edge of centre schemes above these thresholds will require impact assessments. Impact assessment can be requested for proposals that are below the threshold but which are considered to have a significant impact.

**Policy CEN6: Meeting Local Needs for Shopping and Services**

6.1.9   In addition to the hierarchy of centres there is an extensive network of small parades and local shops meeting essential day-to-day needs of communities within walking distance. Policy CEN6 protects such facilities unless it can be demonstrated they are no longer viable. The policy allows for new facilities that are not in a centre of up to 200 sq.m gross, or extensions which would create a total development of 200 sq.m gross, subject to demonstrating need, and/ or deficiencies in the existing provision of convenience shopping, main town centre uses, health and educational facilities. Proposals are subject to meeting strict criteria to ensure development complements the regeneration strategy for centres. Larger scale developments (over 200sq m gross) have to meet the requirements of Policy CEN7.

6.1.10  The potential levels of housing growth in the Black Country up to 2036 means that Policy CEN6 is likely to be a key consideration where new local facilities are proposed to meet the specific needs of new housing development, as recognised in Policy HOU2.

**Policy CEN7: Controlling Out-of-Centre Development**

6.1.11 The Spatial Strategy is based upon major investment in the network of centres in the Black Country, with the exception of developments to meet specific local 'day-to-day' needs which are permitted under Policy CEN6. Therefore, developments outside of centres need to show there is a clear justification why proposals cannot be accommodated within or, failing that, on the edge of any appropriate centre.

6.1.12 In accordance with national policy and to support the strategy, Policy CEN7 states that any proposal for a town centre use in an out-of-centre location, whether brought forward through a Local Development Document or planning application, will only be considered favourably if the sequential and impact assessments contained in the most recent national guidance are satisfied. As Policy CEN6 applies to proposals up to 200sqm (gross), this means that any application above 200sqm (gross) should undertake the impact tests. The policy also states that it is important to ensure developments are accessible by a choice of means of transport.

6.1.13 The policy approach in CEN7 also applies to applications for extensions and variation of conditions.

> **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**

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

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

**Policy CEN8: Car Parking in Centres**

6.1.14 The provision, location, type and charging of car parking has an important role to play in the sustainable growth of the Strategic Town Centres. It also supports the sustainability principles embedded within the Core Strategy transport strategy to manage demand and influence travel behaviour towards sustainable modes (Polices TRAN2 and TRAN5). A key principle of the approach towards car parking is that unless justified car parking will serve the centre as a whole in order to support the centres vitality and viability.

6.1.15 Walsall, Wolverhampton and West Bromwich Strategic Centres all have a parking management regime in place including charging. As a result of the historical development and unique nature of

the Merry Hill shopping centre, Brierley Hill is the only one of the four Strategic Centres that does not currently have car parking charges in place. Hence, Policy CEN8 specifically refers to charging policy for parking to ensure parking policy at the local level is not used as a tool for competition between the centres. The detail of how the policy will be implemented at the local level will be through Development Plan Document's/ Area Action Plans, in accordance with the principles of Policy CEN8.

6.1.16 Non-Strategic Centres have increasingly struggled to compete with the more dominant higher order centres and out-of-centre shopping provision with free car parking. As a result, the policy requires that a lower pricing regime may be identified for Town, District and Local Centres. The provision of parking in new developments within centres will be managed through Development Plan documents, including Town Centre Area Action Plans and Supplementary Planning Documents prepared by individual local planning authorities.

> **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**

> **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**

**Other Centres Issues**

> **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.**

> **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**

## Policy Area E - The Black Country Transport Network

6.1.17 The broad scope of the Policies in this section remain appropriate to be carried forward into the Review. However, some of the individual policies may need updating as discussed below.

### Policy CSP5 Transport Strategy

6.1.18 The Transport policies of the Core Strategy seek to ensure that reliable and efficient transport networks to support national economic competitiveness and growth are provided. Improved access to key destinations is vital to achieve the required step change in the quality and extent of the network to reverse the outward migration of population from the Black Country and to support economic and social aspirations. It is important the network provides rapid, convenient and sustainable links between the Strategic Centres of the Black Country and wider West Midlands, housing growth areas, employment areas, local communities and the regional and national transport networks.

6.1.19 Since the publication of the Core Strategy, the Combined Authority's strategic transport plan "Movement for Growth" has been developed and adopted. This strategy is based on making better use of existing capacity and providing new sustainable transport capacity to support regeneration and growth in the West Midlands. The strategy is to create an overall integrated transport system serving the West Midlands based on four tiers:

6.1.20 **National and Regional Tier:** National highway connections, based on Highways England's strategic highway network of motorways and trunk roads. National and regional passenger rail services and coach services, rail freight capacity and rail freight interchanges.

6.1.21 **Metropolitan Tier**: An integrated Metropolitan Rail and Rapid Transit Network (Rail, Metro, Bus Rapid Transit, Tram-train) with high quality main centre interchanges and supporting park and ride provision. A Key Route Network of main roads. A "flagship" Metropolitan Strategic Cycle Network.

6.1.22 **Local Tier:** High quality local bus services integrated with the rail and rapid transit network, accessible transport, local roads, local cycle networks integrated with the Strategic Cycle Network and attractive, safe conditions for walking and cycling.

6.1.23 **Smart Mobility Tier:** Intelligent mobility services to help make the most of transport capacity and help inform people of the travel options available to them. This includes the development and delivery of a trial "Mobility as a Service" (MaaS) initiative.

6.1.24 The Core Strategy sets the agenda for the transformation of the Black Country transportation network. It identifies the key factors required to enhance the transport infrastructure and assist delivery of the Spatial Objectives for the area:
- Improved accessibility of services to the population
- Improved connectivity through an integrated public transport network, including future links to High Speed Rail

- Improved road networks and links to the national M5 and M6 motorway network
- Improved access to the freight railway network for HGV's and better management of their movements
- Improved walking and cycling provision
- Increase in use of low –emission vehicles

6.1.25 The large-scale land use changes proposed in the Core Strategy require an effective and integrated transport network which will serve existing and new developments and promote greater use of sustainable transport modes, (walking, cycling public transport and car sharing) helping to reduce the growth in car borne journeys. This transport strategy for the Black Country is intended to reflect the following strategic outcomes:

- Enabling the expansion of strategic centres
- Providing communities with improved access to employment, residential services and other facilities and amenities, with travel choices that are attractive, viable and sustainable
- Improving air quality and helping to address negative impacts on climate change
- Improving the accessibility of employment sites to residential areas
- providing reliable access for freight to the national motorway network
- Facilitating access to employment areas, particularly strategic high quality employment opportunities
- Containing congestion by developing and managing transport networks to operate more efficiently
- Improve road safety
- Supporting the strategy through demand management (such as pricing, availability of car parking and road user charging) and the promotion of sustainable transport
- Improve access to information relating to travel options for visitors, businesses and local people.

6.1.26 The transport objectives for the Core Strategy continue to reflect:

- Current National transport guidance and 'Movement for Growth' the current West Midlands Strategic Transport plan;
- The vision and Spatial objectives for Black Country;
- Existing and Future transport challenges

The Black Country Strategic Economic Plan

6.1.27 The government's DaSTS goals for transport have been superseded by new advice, which is captured within the Movement for Growth document. The transport strategy and policies in the Core strategy reflect the approach in West Midlands Strategic Transport plan 'Movement for Growth', which covers a twenty year period. The shared long term vision remains the same.

6.1.28 The technical work undertaken by PRISM modelling to inform the development of the Black Country Core Strategy demonstrated that the various multi modal networks continue to function during the plan period and that planned interventions deliver improvements to their performance. However, following the issues and options stage further transport modelling will be undertaken to forecast the traffic impacts of the specified green belt scenarios, identify locations

that may require further investigation regarding traffic impacts and identify the transport infrastructure requirements for any potential new green belt sites (including highway, public transport, walking & cycling routes). An emphasis on 'Smarter Choices' and the recognition of the benefits to be secured by embracing and promoting the advantages of new technologies, such as broadband, video conferencing and internet shopping, assists in achieving the transport outcomes in the long term.

6.1.29 The Highways England Road Investment strategies integrate with the Core Strategy approach. Work commissioned by Midlands Connect, the joint East-West Midlands transport partnership, is studying the Midlands Motorway Hub. This will identify nationally significant infrastructure with short, medium and long term priorities which will impact on the Black Country. The Midlands Connect inter-regional transport strategy will be published in spring 2017. HS2 brings with it new drivers for access to rail interchange, and opportunities for the re-casting of services within the local rail network.

6.1.30 Proposals to enhance the connectivity of the region to HS2 have been assessed and corridors within the Black Country identified as priorities for investment at a West Midlands and sub regional level.

6.1.31 The primary evidence remains appropriate, with additions in the form of:
- Movement for Growth
- West Midlands HS2 Connectivity Strategy
- Midlands Connect Emerging Strategy (Jan 2017)

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

**Policy TRAN1 – Priorities for the Development of the Transport Network**

6.1.32 The Core Strategy seeks to identify ways to deliver an improved and integrated transport network both within the Black Country and in links with regional and national networks. The regional and national landscape for transport has changed significantly since the adoption of the Core Strategy. The wider West Midlands has formed a Combined Authority, a new body for the development and promotion of nationally significant infrastructure has been established in the form of Midlands Connect and High Speed 2 (HS2) is set to be delivered.

6.1.33 The West Midlands Strategic Transport Plan: Movement for Growth outlines an approach to transportation described above. Movement for Growth provides a significant part of the transport evidence base for the Core Strategy review.

6.1.34 Since the adoption of the Core Strategy in 2011 the following TRAN1 priority improvements have been delivered or are committed for delivery in the short term:

- Darlaston SDA access scheme completed,
- I54 motorway access in place,
- Metro Line 1 Improvements complete,
- Burnt Tree Junction improvement delivered,
- Junction 9 of M6 improvement works complete,
- Active Traffic Management and Hard Shoulder Running on M6 in Black Country complete,
- Red Routes package 1 completed,
- Established West Midlands Rail Ltd to increase local influence over rail passenger services.
- Wolverhampton Interchange (Bus Station) completed,
- Wolverhampton Interchange (train station) and Metro Strategic Centre Extension now committed,
- Midland Metro between Wednesbury and Merry Hill / Brierley Hill committed.

6.1.35    It is proposed to update the Core Strategy Transport Key Diagram to show delivered, committed and remaining priorities.


6.1.36    The TRAN1 policy remains appropriate, but the key transport priorities are now considered by the Black Country authorities to be:

- Continue to provide rapid transit extensions to the Midland Metro and re-introduce rail services to connect the Black Country Strategic Centres to each other and Birmingham. First priority now being to complete committed schemes for Wednesbury to Merry Hill / Brierley Hill and Wolverhampton Interchange Strategic Centre Extension
- Improving M5 junction 1 and Birchley Island adjacent to J2
- Improving junction 10 of M6
- Active Traffic Management and Hard Shoulder Running through M6 / M5 interchange to M5 Junction 3
- Delivering a quality bus network across the Black Country, Improving access from the Black Country to Birmingham Airport and the two Future HS2 stations in the West Midlands.
- Highway improvements to support regeneration in strategic centres and key growth locations
- Multi-modal whole corridor investment in the Black Country's main roads which form part of the West Midlands Key Route Network
- West Midlands Strategic Cycle Network links in the Black Country
- Development of road to rail freight interchange facilities to serve the sub region

6.1.37    Priority will also be given to the implementation of the other projects identified in the West Midlands Strategic Transport Plan: Movement for Growth, particularly local rail improvements, transport interchanges and park and ride sites, including:

- Improved rail passenger services,
- Walsall to Wolverhampton passenger rail,
- Improvements to existing railway stations, and provision of new railway stations to meet demand at particularly Aldridge, Willenhall, James Bridge Enterprise Zone and Portobello.

6.1.38    Other corridors where the public transport demand would support rapid transit include:
- Stourbridge to Brierley Hill,
- A456 Hagley Road from Birmingham to Quinton,
- A449 Stafford Road from Wolverhampton to i54,
- A34 Walsall to Birmingham

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

**Policy TRAN2 – Managing Transport Impacts of New Development**

6.1.39    An even greater focus on choice of modes for access to new developments, including electric vehicle charging infrastructure, use of low emission vehicle technology and provision for cycles and motorcycles is needed. Smart mobility and mobility as a service should also be recognised for its role in supporting modal choice.

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

**Policy TRAN3 – The Efficient Movement of Freight**

6.1.40   The spatial objectives for freight remain the same and there are proposals coming forward for Rail Freight Interchange at Bescott and Four Ashes which support the sub regional economy. References to the Principal Road Network should now be changed to Key Route Network, as defined by the West Midlands Combined Authority.

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

**Policy TRAN4 – Creating Coherent Networks for Cycling and Walking**

6.1.41   Walking and Cycling strategies are incorporated within 'Movement for Growth' and the West Midlands Cycle Charter, with targets to raise levels of cycling across the West Midlands to 5% of all trips by 2023 and 10% by 2033. The four Black Country Local Authorities have a combined walking and cycling strategy and use funding allocated through the Integrated Transport Black and competitive opportunities to make infrastructure improvements.

6.1.42   A map of the Black Country cycling investment opportunities has been developed as part of the Black Country Cycling and Walking Strategy, to identify, missing links, barriers and whole route improvements through the Black Country and connecting with adjacent authorities.

6.1.43 In order to achieve a coherent Black Country and West Midlands cycle network, the four local authorities have agreed to follow the West Midlands Cycle Charter for design principals.

6.1.44 It is proposed to update the Cycle Network Diagram to reflect the Walking and Cycling Strategy.

**Question 92 - Do you support the proposed approach to providing a coherent network for walking and cycling? Yes/No**
**Please explain why**

## Policy TRAN5 – Influencing the Demand for Travel and Travel Choices

6.1.45 The Black Country Local Authorities are committed to considering all aspects of traffic management in the centres and wider area in accordance with the Traffic Management act 2004. It is proposed to retain the current priorities for traffic management in the Black Country, but to add a reference to further joint working to develop the identified West Midlands Key Route Network in order to manage region-wide traffic flows, and to introduce the following new priorities:

- Introducing opportunities for new transport technologies, including ultra low emission vehicles, new traffic systems and smart ticketing,
- Promoting mobility as a service.

**Question 93 - Do you support the proposed changes to Policy TRAN5? Yes/No**
**Please explain why**

## Policy Area F - The Black Country Environment

### Environmental Infrastructure and Place-Making

6.1.46 Environmental infrastructure is a key theme of the Core Strategy Vision and there are a range of policies in the Core Strategy, supported by other Local Plan policies and proposals, to help deliver this transformation and support regeneration. Since adoption of the Core Strategy there has been progress in a number of areas. Environmental proposals have been taken forward in Development Plan Documents (DPDs) and historic landscape characterisation studies have been completed. An up-to-date Black Country Environment Spatial Plan is being produced to draw together existing evidence underpinning the review and work to define ecological networks within the Black Country is underway.

6.1.47 Work is also underway to develop viable Garden City principles (visit www.tcpa.org.uk/garden-city-principles for more details of these principles) which could be applied to housing-led developments in the Black Country, covering sustainable transport and green infrastructure networks, biodiversity gains, carbon emission reductions and climate change resilience.

6.1.48 Adoption of DPDs setting out detailed and deliverable environmental proposals has removed the need for Environmental Infrastructure Guidance Phase 2, therefore it is proposed to remove references to this throughout the Core Strategy. It is also proposed to update environmental proposals in Appendix 2 of the Core Strategy to reflect adopted DPDs and include new proposals to address the environmental infrastructure needs of new developments in light of up-to-date evidence. If Garden City principles are agreed, any additional requirements could be inserted in Policy CSP3: Environmental Infrastructure. It is also proposed to remove reference in Policy CSP3 to renewable energy generation as a form of environmental infrastructure, as this implies that expanding renewable energy generation would always be appropriate whereas it is not always possible to support such expansion. Policies CSP3 and CSP4: Place -Making would otherwise remain unchanged.

---

**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.**

---

**Question 95a - Do you think Garden City principles should be applied in the Black Country? Yes/No**
**If yes, how should they be applied?**
**Question 95b - Should the application of Garden City principles be different for brownfield and greenfield sites? Yes/No**
**Please explain why**

**Policy ENV1 - Nature Conservation**

6.1.49 This Policy has worked effectively to protect and enhance biodiversity and geodiversity across the Black Country. It is proposed to amend the Policy to include Ancient Woodland in the list of nationally designated sites and to bring the wording on mitigation into line with NPPF para 152. It is also proposed to add to the list of requirements for new development the incorporation of biodiversity features, such as new natural green space, use of native species and nest boxes, as this is supported by para 118 of the NPPF. To update the supporting text, it is proposed to include reference to the Black Country Geopark.

> **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?**

**Policy ENV2 - Historic Character and Local Distinctiveness**

6.1.50 This Policy strengthened previous approaches to the historic environment in the Black Country which recognises and builds on the diverse character of the area. Historic Landscape Characterisation (HLC) principles have been used to define locally distinctive elements of the Black Country and guide local policies and proposals. This work does not indicate the need to amend the list of locally distinctive elements listed in the Policy. It is proposed to update the Policy to reflect latest national policy and guidance, particularly in relation to Design and Access Statements (which are not now required).

> **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.**

**Policy ENV3 - Design Quality**

6.1.51 Since the Core Strategy was adopted housing standards have been simplified at a national level. It is not now possible to require a particular Code for Sustainable Homes Level, so it is proposed to remove this requirement from Policy ENV3: Design Quality. However, it is possible for Local Plans to introduce separate national standards for water consumption, access and space.

6.1.52 A lower than normal water consumption rate could be required for new build homes if this is supported by evidence of clear need. The Black Country does not currently lie in an area of serious water stress, as defined by the Environment Agency, therefore clear need may be difficult to demonstrate. The Black Country is covered by two water companies – South Staffordshire and Severn Trent and so there may be a need to introduce a water consumption standard in one company area but not the other.

6.1.53 A specified % of new build homes could be required to meet access standards M4(2) accessible and adaptable or M4(3) wheelchair user (the equivalent of Lifetime Homes). These standards would make housing usable or easily adaptable for those with disabilities and there is evidence of

local need for such housing, however the standards would make housing more expensive to build and might not be achievable for certain types of housing.

6.1.54 The Housing White Paper (2017) states that there will be a review of the national space standard, which could be reduced or removed. However, if there are no changes, the Nationally Described Space standard (CLG, March 2015) could be introduced through the Core Strategy, covering internal floor area and dimensions for key parts of the home. This would need to be justified by evidence of current build sizes and impact on viability. Given that the standard is modest and is generally met in new build housing across the Black Country, and that Black Country overcrowding rates are higher than the national average, it is likely that introduction of this standard would be viable and would help to achieve better living conditions.

**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.**

**Question 99a - Do you think that national standards for housing development on water consumption should be introduced in the Black Country? Yes/No**
**Please specify what level and percentage would be appropriate and why.**
**Question 99b - Do you think that national standards for housing development on access should be introduced in the Black Country? Yes/No**
**Please specify what level and percentage would be appropriate and why.**
**Question 99c - Do you think that national standards for housing development on space should be introduced in the Black Country? Yes/No**
**Please specify what level and percentage would be appropriate and why.**
**Question 99d - Do you think that the standards should be different for brownfield and greenfield sites? Yes/No**

**Policy ENV4 - Canals**

6.1.55 This Policy was developed in close collaboration with the Canal and River Trust and provides a comprehensive approach to dealing with proposals affecting canals which remains appropriate. There are a number of potential projects which involve the addition to, or restoration of, sections of the canal network within and outside of the Black Country which might affect its waterways. While the current Core Strategy is generally supportive of such projects, the associated technical challenges, such as water availability and compliance with Habitats Regulations, can require a detailed consideration of project feasibility to justify any support. Therefore, it is considered that canal projects require a fine grained approach that is not suited to a strategic document such as the Core Strategy and it is proposed to remove references to canal projects, specifically the restoration of the Hatherton Branch Canal, from the Core Strategy, as part of the review. Such projects could then be considered at a local level, where appropriate, through preparation of site allocation documents and area action plans.

**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.**

**Policy ENV5 - Flood Risk, Sustainable Drainage (SuDS) and Urban Heat Island Effects**

6.1.56   This Policy was developed in close collaboration with the Environment Agency and has proved effective in delivering SuDS (Sustainable Drainage Systems) on developments and reducing surface water flows to greenfield rates on larger developments, where it has been practical to do so.

6.1.57   Changes to national policy on SuDS, including the requirement that SuDS should be provided unless demonstrated to be inappropriate (see NPPG para 79), generally support Policy ENV5. However, the Ministerial Statement of 18/12/14 states that this type of policy should only apply to major developments, to avoid excessive burdens on business.  Therefore it is proposed to amend part a) of the Policy to apply only to major developments (10 or more homes and major commercial developments).

6.1.58   Although part a) refers to ground conditions, as this is a key factor in the Black Country restricting the type of SuDS which can be provided, there is no requirement to prioritise natural green space SuDS where this is practical and viable.  It is therefore proposed to include the requirement to prioritise natural green space SuDS within part a), as this type of SuDS supports wider environmental infrastructure aims as set out in Policy CSP3.

6.1.59   Part d) requires surface water flows to be reduced to greenfield rates on sites requiring a Flood Risk Assessment.  As the review will be considering greenfield sites, it is also proposed to add to the policy a specific requirement for greenfield sites to maintain surface water flows at greenfield rates.

> **Question 101a - Do you support the proposed changes relating to Flood Risk, Sustainable Drainage and Urban Heat Island effects? Yes/No**
> **Question 101b - Do you think that any other changes should be made to Policy ENV5 Yes/No**
> **Please provide details.**

**Policy ENV6 - Open Space, Sport and Recreation**

6.1.60   Policy ENV6 creates the framework for open space policies at a local level.  The Policy is in line with national guidance and is supported by detailed policies in Local Plans, therefore it is proposed to retain this Policy and update some references in the Policy and supporting text to reflect changing circumstances.

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

**Policy ENV7 - Renewable Energy**

6.1.61 Policy ENV7: Renewable Energy set out a new policy for the Black Country authorities, in line with 'Merton' style policies across the country at the time, to deliver 10% renewable energy on major development sites, subject to viability. Wolverhampton and Dudley Councils have subsequently adopted SPDs to provide guidance on application of the Policy and Wolverhampton has been successful in securing this requirement on most developments. Other Black Country authorities have not been as successful in securing the requirement due to viability. Developers sometimes argue that higher energy efficiency standards should be accepted in lieu of renewable energy generation. For housing developments this would not now be possible, as national policy does not allow Local Plans to set policies requiring energy efficiency standards which exceed building regulations (see above).

6.1.62 At the time Policy ENV7 was introduced it was anticipated that zero carbon standards would start to be introduced from 2016, making Policy ENV7 redundant over time. However, although building regulations energy efficiency standards have since been tightened, the Government now has no plans to improve these standards further or to introduce zero carbon standards in future. The simplification of housing standards referred to above does not affect the ability of Local Plans to keep existing Merton style policies, and non domestic buildings can still be required to exceed building regulations standards e.g. through BREEAM.

6.1.63 Therefore, Policy ENV7 remains the only mechanism in the Black Country to increase renewable / low carbon energy production and to directly reduce the carbon emissions which will result from the significant amounts of development planned up to 2036.

6.1.64 It is proposed to make minor changes to the Policy, by explaining the term 'residual energy demand' (as set out in the Wolverhampton SPD) and removing the last bullet point which does not add value. However, more major changes could be made to the Policy. For example, the requirements could be loosened for non domestic buildings to allow increased energy efficiency standards in lieu of renewable energy provision. The % requirement could also be changed, although this would need to be justified with evidence e.g. regarding viability. For example, for green belt sites it might be more viable to require a higher %.

> **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**
> **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.**
> **If you think that any other changes should be made to Policy ENV7, please provide details.**

**Policy ENV8 - Air Quality**

6.1.65 Since adoption of the Core Strategy the Black Country authorities have taken part in the West Midlands Low Emissions Towns and Cities Programme (WMLETCP), which has resulted in the adoption of a Black Country wide SPD on Air Quality, which supports Policy ENV8: Air Quality. The Black Country approach is in line with national policy and the current national focus on air quality issues, in light of growing evidence of health problems linked to air pollution.

6.1.66 It is proposed to retain and reword the Policy and supporting text to reflect the approach set out in the SPD and the WMLETCP.

> **Question 104 - Do you support the proposed changes relating to Air Quality?  Yes/No**
> **If yes, do you think that any other changes should be made to Policy ENV8 - please provide details.**

# Policy Area G - Waste

6.1.67 Managing waste in a responsible way is an important element of sustainable development and facing up to climate change. This can be achieved including by addressing waste as a resource, minimising waste, managing unavoidable waste in ways that will minimise harmful effects and providing sufficient waste management capacity to meet current and future requirements of the Black Country.

6.1.68 The broad scope of the Policies in this section remain appropriate to be carried forward into the Review.  However, some of the individual policies may need updating as discussed below.

**Sustainable Waste and Resource Management**

6.1.69 Policy WM1 aims to achieve zero waste growth by 2026 and sets out a number of measures by which sustainable waste management will be delivered.  This Policy is considered to provide generally the right kind of framework to address the waste management issues for the Black Country, in accordance with the NPPF.

6.1.70 The Policy then identifies landfill diversion targets for municipal solid waste (MSW) and commercial and industrial waste (C&I) and the new waste capacity that will need to be provided to meet these targets and achieve "equivalent self-sufficiency" in waste terms by 2026.  A Waste Study will be commissioned to update these figures at Draft Plan stage, enabling a full assessment of the potential impacts of housing and employment growth, and taking into account any available national and regional data.

> **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.**

**Protecting and Enhancing Existing Waste Management Capacity**

6.1.71 Policy WM2 identifies existing strategic waste management sites and sets out conditions governing proposals to improve or redevelop such sites, including loss for housing or community uses in line with the wider Spatial Strategy.  The Policy also controls proposals for housing and

other potentially sensitive uses close to an existing waste management site, where there is potential for conflict between the uses.  The Waste Study will provide information to update the identified strategic waste management sites.

**Question 106a - Do you support the approach set out in Policy WM2? Yes/No**
**If no, please explain why.**
**Question 106b – Do you think that there are any strategic waste management sites that no longer need to be protected or other sites that do need to be protected? Yes/No**
**If yes, please provide details.**

**Figure 12        Black Country Core Strategy Waste Key Diagram**



Black Country Core Strategy Waste Key Diagram
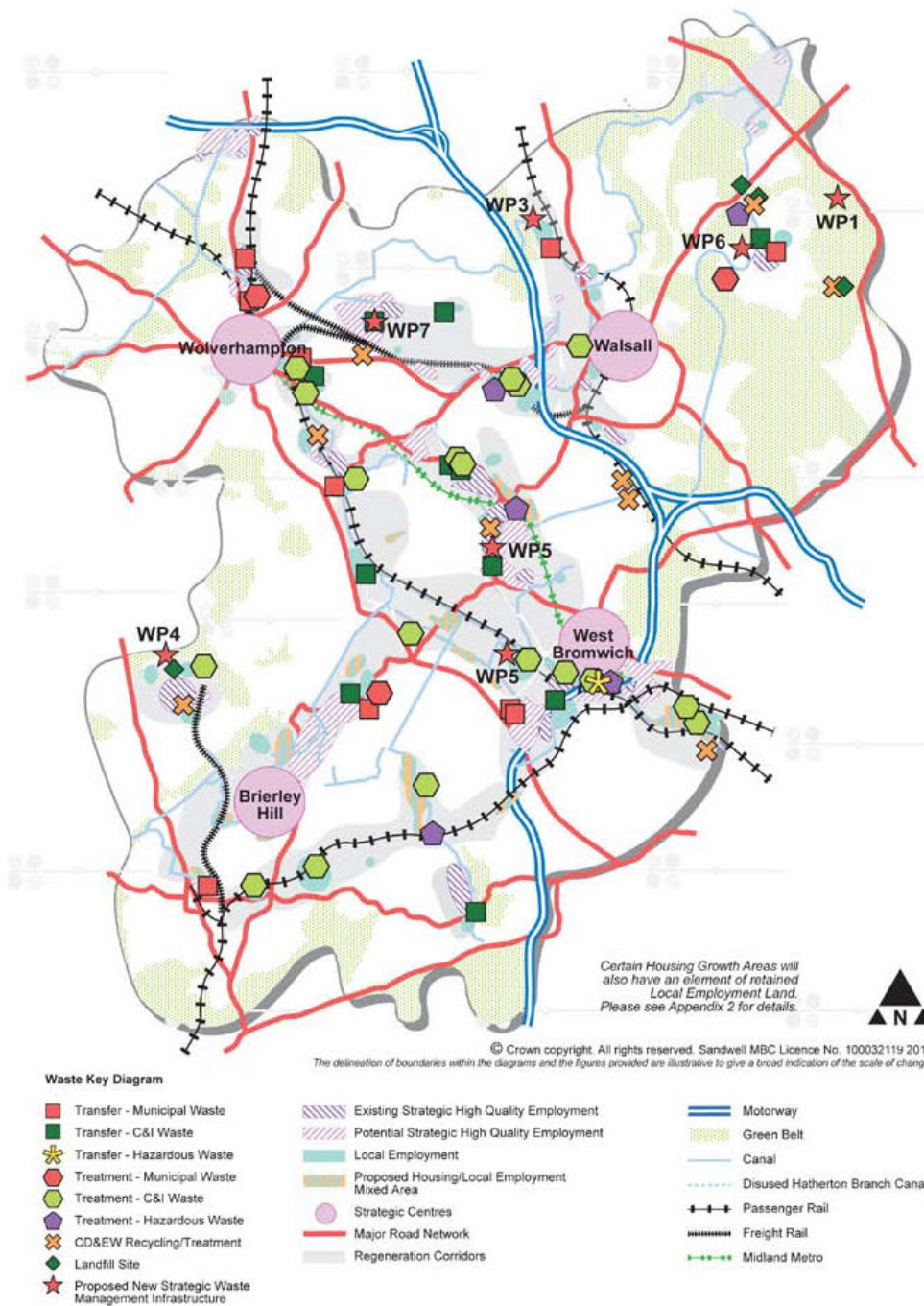
**Strategic Waste Management Proposals**

6.1.72 Policy WM3 identifies locations for proposed new strategic waste management infrastructure which are expected to make a significant contribution towards the new capacity requirements set out in Policy WM1.  It is proposed to update this list by removing those projects which have been

completed and adding proposals which have been permitted or allocated in other Local Plan documents. The Waste Study will provide information to update the list of strategic waste management proposals.

**Locational Considerations for New Waste Management Facilities**

6.1.73 Policy WM4 sets out locational considerations, assessment criteria and information requirements for all types of waste management proposals, including landfill. This includes the requirement that waste arising in the Black Country should be managed within the Black Country where feasible and managed as close as possible to its source of origin. A key aim of the policy is to minimise adverse visual impacts, harmful effects on the environment and human health and localised impacts on neighbouring uses.

6.1.74 The Policy identifies employment areas as the ideal location for most waste management facilities, and identifies waste operations most suited to local quality employment land, including skip hire, scrap yards and open air facilities. The Policy has been successful in raising the quality of new waste facilities across the Black Country, by ensuring these are contained within a building or physical enclosure and that quality boundary treatments and landscaping are provided. This has helped to minimise impacts on neighbouring uses and increase environmental quality.

**Resource Management and New Development**

6.1.75 Policy WM5 sets out general principles on waste management and resource efficiency to be addressed by new developments, including requirements to manage large amounts of waste on-site or nearby, to recycle and re-use products as far as possible, and to design sites with resource and waste management in mind. The Policy also sets out specific information requirements for major developments.
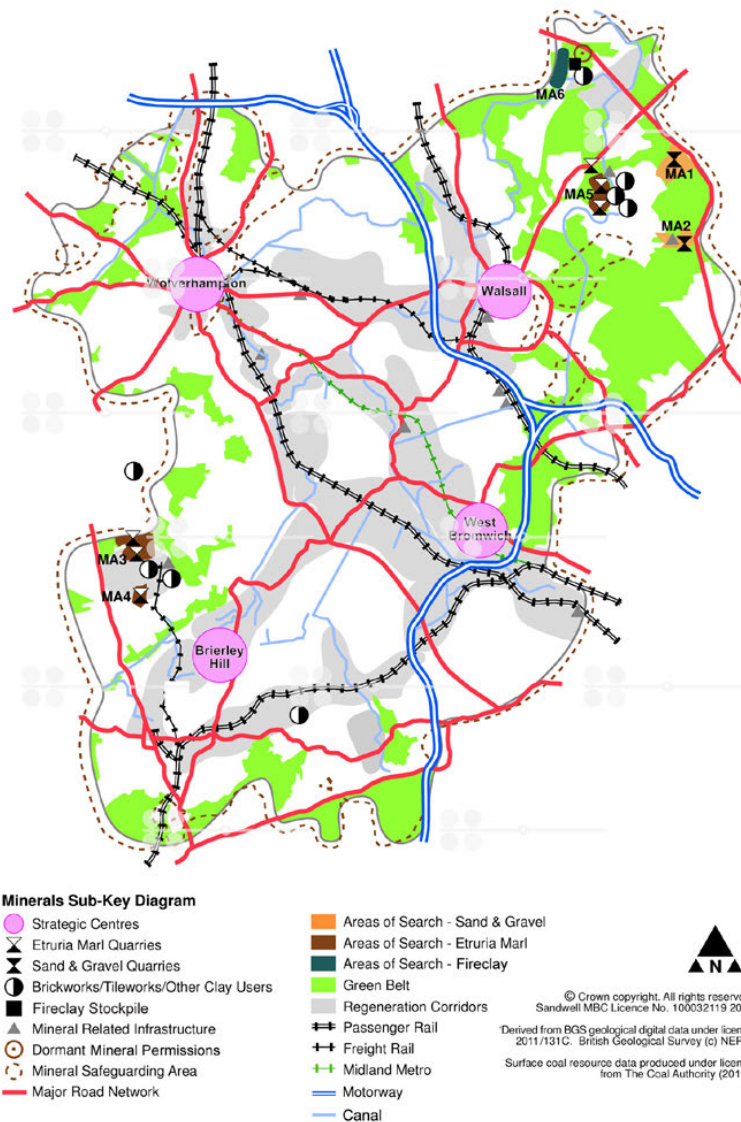
## Policy Area H - Minerals

6.1.76 Minerals are an important – and finite – resource for the nation in providing raw materials for many activities, including development. The Black Country has an interesting and complex geology. The availability of mineral resources has done much to shape the development and character of the area and dealing with the legacy of past mineral working is a major issue. However, whilst mineral resources underlie almost all of the Black Country, active workings are now confined to the fringes of the area. New or expanded workings might face environmental constraints and could conflict with plans for future housing and employment growth.

6.1.77 Over recent years the only minerals extracted have been sands and gravels and Etruria Marl (a type of clay used for brick and tile making). Other minerals, including building stone and coal, have been extracted in the past, and there may be other ways of exploiting mineral resources in the future. However, facilities for the recycling of construction, demolition and excavation waste (both on permanent sites and as part of redevelopments) produce more aggregates than are provided by quarrying.

6.1.78 The broad scope of the Policies in this section remain appropriate to be carried forward into the Review. However, some of the individual policies may need updating as discussed below.

6.1.79 Much of the evidence about mineral resources has been long established and many of the mineral operations in the Black Country have been in existence for some time. Changes that are proposed to the Minerals Key Diagram to reflect changing circumstances are listed below:

6.1.80 WALSALL
Etruria Marl Quarry along the A461 - ceased extraction and is operating as a landfill site
MA1 – ceased operation (not restored)
MA2 – ceased operation (could restart)

6.1.81 DUDLEY
Sedgley Works – ceased operation and redeveloped for housing
Stourbridge Works – ceased operation and allocated for housing
Himley Quarry – brick clay extraction has ceased and site is operating as a landfill site

6.1.82 The authorities welcome any additional evidence there might be about the existence and workability of mineral resources and about mineral infrastructure, and will ensure that the implications for mineral resources and the impacts of mineral issues on development will be taken into account in future work on the capacity for and delivery of new development.

**Figure 13    Black Country Core Strategy Minerals Key Diagram**



Black Country Core Strategy Minerals Key Diagram

**Minerals Sub-Key Diagram**

| Symbol | Description | Symbol | Description |
|---|---|---|---|
| ● | Strategic Centres | ▮ | Areas of Search - Sand & Gravel |
| ✕ | Etruria Marl Quarries | ▮ | Areas of Search - Etruria Marl |
| ✕ | Sand & Gravel Quarries | ▮ | Areas of Search - Fireclay |
| ◑ | Brickworks/Tileworks/Other Clay Users | ▮ | Green Belt |
| ■ | Fireclay Stockpile | ▮ | Regeneration Corridors |
| ▲ | Mineral Related Infrastructure | ▬ | Passenger Rail |
| ⊙ | Dormant Mineral Permissions | ▬ | Freight Rail |
| ⟨⟩ | Mineral Safeguarding Area | ▬ | Midland Metro |
| ▬ | Major Road Network | ▬ | Motorway |
|  |  | ▬ | Canal |

© Crown copyright. All rights reserved.
Sandwell MBC Licence No. 100032119 2011

'Derived from BGS geological digital data under licence
2011/131C. British Geological Survey (c) NERC'

Surface coal resource data produced under licence
from The Coal Authority (2011).

183

**Managing and Safeguarding Minerals Resources**

6.1.83   Policy MIN1 sets out a strategy for the sustainable management of mineral resources, providing a context for other Policies in this section of the Core Strategy.  The Policy is considered to continue to provide the right kind of framework to address key minerals issues for the Black Country, in accordance with the NPPF.

6.1.84   The Policy identifies the mineral resources in the Black Country that are or could be of economic importance.  These underlie almost all of the Black Country and are protected by inclusion within a Mineral Safeguarding Area (MSA), which is shown on the Core Strategy Minerals Key Diagram and defined in more detail in individual authorities' Local Plans.  None of the work undertaken to inform Local Plan preparation indicates that the MSA in the Core Strategy should be amended.

100

6.1.85 The Policy protects and promotes mineral extraction, where feasible and appropriate. It establishes Areas of Search where development will not be permitted where it would sterilise mineral resources, and restricts development which would compromise the ability of operational quarries to function.

6.1.86 More generally across the MSA development proposals are encouraged to consider the extraction of minerals in advance of construction. Information demonstrating that mineral resources would not be needlessly sterilised is required for larger developments - 5 ha or more in the urban area and 0.5 ha or more in the green belt. This should include a scheme for 'prior extraction', or justification as to why one would not be feasible or desirable. Since 2011, prior extraction has been considered as part of the remediation of some relatively large sites (notably Phoenix 10 in Walsall), but has not proved viable or practical for any particular site.

6.1.87 However, the review will need to bring forward significant housing and employment growth in the green belt, much of which falls within the MSA. Speed of delivery, particularly of housing sites, will be a key issue, and although prior extraction may be viable for some green belt sites it could also significantly delay development. It is also unlikely that all promoters of smaller green belt sites will be able to carry out site investigations and a viability assessment to inform site allocation, making it difficult to estimate the delivery timescales for such sites. Therefore, it is proposed to increase the 0.5 ha threshold for green belt sites to 3 ha, or approximately 100 homes. This would mean that prior extraction could be seriously considered for all larger sites, in light of comprehensive evidence, whilst being weighed against the importance of early delivery of development.

6.1.88 The final part of Policy MIN1 refers to key mineral related infrastructure (including handling, storage and processing facilities), identified on the Minerals Key Diagram, and requires proposals that would result in the loss of any of these facilities to demonstrate there is no longer a need for the facility or redevelopment for other mineral related uses.

> **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?**

> **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?**

> **Question 112 – Do you think that there are any key mineral related infrastructure sites that no longer need to be protected or other sites that do need to be protected? Yes/No**
> **Please provide any details.**

**Production of Aggregate Minerals**

6.1.89 Policy MIN2 states that the main source of supply of aggregates from within the Black Country will be from secondary and recycled materials. It also seeks to make an appropriate contribution towards the primary land-won sand and gravel target for the former West Midlands County area. However, the Joint Local Aggregates Assessment (LAA) prepared by the West Midlands Metropolitan Authorities in 2015 confirms that the sand and gravel working areas identified in the Solihull Local Plan 2013 should be sufficient to meet this target. During the Core Strategy review it is intended to update the LAA to cover the period up to 2036.

6.1.90 The Core Strategy proposes that extraction of primary aggregates should be concentrated in two Areas of Search around existing quarries in the eastern part of Walsall. Recent work for Walsall's SAD has estimated the resources available in these areas, although working has not taken place in recent years and there is no significant resource with planning permission. The SAD defines the Areas of Search in detail and seeks restoration of the existing / remaining quarry workings as part of any proposals for further mineral extraction.

6.1.91 The Core Strategy allows for sand and gravel extraction outside the Areas of Search if there is evidence that extraction targets cannot be met. However, the Mineral Study for Walsall's SAD has concluded that there is no need to make further provision for sand and gravel extraction up to 2026 and no evidence of workable deposits.

6.1.92 Policy MIN2 also includes provision for 'borrow pits' to provide material for specific construction or engineering projects. This is subject to such proposals being well-related to the project they are serving and being temporary permissions.

> **Question 113 - Do you think that Policy MIN2 identifies all of the key aggregate minerals issues that need to be addressed in the Core Strategy up to 2036, in accordance with national policy? Yes/No**
> **If not, what changes should be made to the policy?**

**Maintaining Supplies of Brick Clay**

6.1.93 The extent of Etruria Marl brick clay resources in the Black Country is shown in Appendix 7 of the Core Strategy, and there are also fireclay resources that are not currently being worked. Policy MIN3 aims to provide each operational brick and tile works with a supply of Etruria Marl for as long as possible and for 25 years where feasible, and expresses support for the principle of brick clay extraction in the identified areas of search within Walsall and Dudley, subject to strict environmental controls and restoration requirements.

6.1.94 However, the constrained sites occupied by the quarries in Dudley and evidence supporting Walsall's SAD indicate that there is unlikely to be significant potential to extract further Etruria Marl within the areas of search. Evidence shows that there is a deficiency in local supply of brick clays, in which case Policy MIN3 would allow for extraction of clay outside the areas of search. However, the only areas that are not heavily built up and where there could be brick clay reserves are in Walsall Wood / Shelfield / Aldridge area of Walsall where one site is being restored

(Vigo/Utopia), another is being infilled with non-hazardous waste (Highfields South) and a third, with a 'dormant' permission is the subject of a designation as a SSSI (Highfields North).

6.1.95   The Core Strategy also referred to the existence of fireclays (in association with surface coal measures) in the Brownhills area of Walsall. It identified a dormant permission at Brownhills Common and an Area of Search at Yorks Bridge but explained that fireclay has not been extracted locally in recent years.  Work for Walsall's SAD has set out policy requirements in case there should be efforts to progress mineral extraction at Brownhills Common.  It also sets out detailed requirements in case there is any proposal for mineral extraction in the Yorks Bridge area.  It has not, however, proposed a new area of search as it is not considered that an extraction proposal could be delivered in the period to 2026.  Rather Yorks Bridge is included within the Mineral Safeguarding Area.

6.1.96   The Core Strategy also supports the pooling or sharing of brick clay resources, stockpiling of clays and importation of clays from outside the locality, where this is needed.

> **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.**

**Exploitation of Other Mineral Resources**

6.1.97   Policy MIN4 identifies coal, fireclay and natural building stone as the main resources that might be exploited over the Plan period.  The Policy sets out criteria governing proposals for such exploitation, including exploitation of coal bed methane.

6.1.98   The Policy sets out a general presumption against deep mining of coal, surface coal working and the disposal of colliery spoil.  However, some surface coal resources occur in association with fireclay, which is of importance for brick and pottery making.  The policy refers to an existing 'dormant' permission for the working of clay and coal at Brownhills Common.  Walsall's SAD includes a policy (M9) to guide any future workings and restoration – and at the nearby sites Birch Coppice and at Yorks Bridge – in case proposals should come forward.

6.2.1   Since the Core Strategy was adopted, 'fracking' (the hydraulic fracturing of underground rock strata to extract shale gas) has become an issue that has attracted media attention.  It is subject to the Government's PEDL regime, with the involvement of regulatory bodies including the Environment Agency and the Health and Safety Executive.  No licences have been sought in the Black Country.  Walsall's SAD includes a policy which requires similar considerations to apply to the exploitation of shale gas as to coal bed methane.

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

**New Proposals for Mineral Developments**

6.2.2    Policy MIN5 sets out the criteria relating to new mineral developments, including environmental, transport and amenity issues.

> **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?**

## Policy Area J - Growth Network Detailed Proposals

6.2.3    Appendix 2 of the existing Core Strategy document set out detailed proposals for the transformation of the Regeneration Corridors and Strategic Centres.  These proposals are summarised in Tables 2 and 3.  It is proposed to update Appendix 2 and Tables 2 and 3 of this Document to reflect adopted and emerging Site Allocations Documents and Area Action Plans, and also to add in new proposals for development, infrastructure and delivery to cover the period up to 2036, in line with new evidence, particularly the EDNA, which identifies potential surplus employment land suitable for housing up to 2036.  Given the level of detail now provided in adopted Local Plans, it is also proposed to reduce the amount of detail provided in Appendix 2. This includes amendments to the boundaries of the Regeneration Corridors and Strategic Centres where these do not now accord with more detailed Local Plan documents or in light of more up-to-date evidence.

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

## Policy Area K – Monitoring and Additional Policies

6.2.4    The Core Strategy includes a Monitoring Framework, to measure progress towards achieving the Core Strategy Vision and Spatial Objectives.  This Framework includes at least one indicator for each Policy.  Progress against these indicators has, where possible, been reported in the annual Authority Monitoring Report (AMR) produced by each authority.

6.2.5    A number of the Core Strategy indicators have proved difficult to collect data for or have had limited functionality.  National policy on Local Plan monitoring has changed significantly since the Core Strategy was adopted and is now less prescriptive, for example Core Output Indicators no longer exist.  Therefore it is proposed to significantly reduce the number of indicators in the Core Strategy and to focus on the key quantitative indicators which relate to delivery of development, as set out in Appendix C.

> **Question 118 - Do you agree with the proposal to streamline and simplify the Core Strategy Monitoring Framework? Yes/No**
> **If no, please explain why**

6.2.6   In reviewing the Core Strategy, there is opportunity to consider whether any additional policies are required to deal with an issue in the Black Country. This may especially be the case if new challenges have been identified that cannot be addressed through amending existing policies. In the light of new evidence it is considered that the need to consider amending the green belt to accommodate further growth will require a new section in the Plan, which is likely to include the allocation of specific sites rather than broad areas for development.

**Question 119 – Do you think that a new Core Strategy policy is required? Yes/No**
**If yes, please explain why and provide details of the suggested policy.**

# Appendix A   Black Country Local Plan Documents

**Dudley**

Brierley Hill Area Action Plan – 2011
Halesowen Area Action Plan – 2013
Stourbridge Area Action Plan – 2013
Community Infrastructure Levy - 2015
Dudley Borough Development Strategy – 2017

**Sandwell**

Smethwick Area Action Plan – 2008
Tipton Area Action Plan - 2008
Site Allocations and Delivery Development Plan Document (2011-21) – 2012
West Bromwich Area Action Plan – 2012
Community Infrastructure Levy - 2015

**Walsall**

Walsall Unitary Development Plan (saved policies) - 2005
DRAFT Site Allocation Document (submitted June 2017)
DRAFT Walsall Town Centre Area Action Plan (submitted June 2017)

**Wolverhampton**

Wolverhampton Unitary Development Plan (saved policies) – 2006
Bilston Corridor Area Action Plan – 2011
Stafford Road Corridor Area Action Plan – 2011
Wolverhampton City Centre Area Action Plan – 2016
Tettenhall Neighbourhood Plan – 2014
Heathfield Park Neighbourhood Plan - 2014

## Appendix B   Black Country Housing Trajectory

| Year | Black Country Core Strategy Housing Target | Actual Completions / Trajectory | Cumulative Core Strategy Target | Cumulative Actual to Date | Cumulative Trajectory |
|---|---|---|---|---|---|
| 2006/7 | 2625 | 2838 | 2625 | 2838 | |
| 2007/8 | 2625 | 1829 | 5250 | 4667 | |
| 2008/9 | 2625 | 1415 | 7875 | 6082 | |
| 2009/10 | 2625 | 2642 | 10500 | 8724 | |
| 2010/11 | 2626 | 1951 | 13126 | 10675 | |
| 2011/12 | 2625 | 2457 | 15751 | 13132 | |
| 2012/13 | 2625 | 2296 | 18376 | 15428 | |
| 2013/14 | 2625 | 2145 | 21001 | 17573 | |
| 2014/15 | 2625 | 3129 | 23626 | 20702 | |
| 2015/16 | 2635 | 2549 | 26261 | 23251 | 23251 |
| 2016/17 | 2448 | 3206 | 28709 | | 26457 |
| 2017/18 | 2448 | 4801 | 31157 | | 31258 |
| 2018/19 | 2448 | 4854 | 33605 | | 36112 |
| 2019/20 | 2448 | 4688 | 36053 | | 40800 |
| 2020/21 | 2448 | 4340 | 38501 | | 45140 |
| 2021/22 | 4899 | 4295 | 43400 | | 49435 |
| 2022/23 | 4900 | 4203 | 48300 | | 53638 |
| 2023/24 | 4900 | 4159 | 53200 | | 57797 |
| 2024/25 | 4900 | 4015 | 58100 | | 61812 |
| 2025/26 | 4901 | 3946 | 63001 | | 65758 |
| 2006-26 | 63001 | 65758 | 63001 | | 65758 |
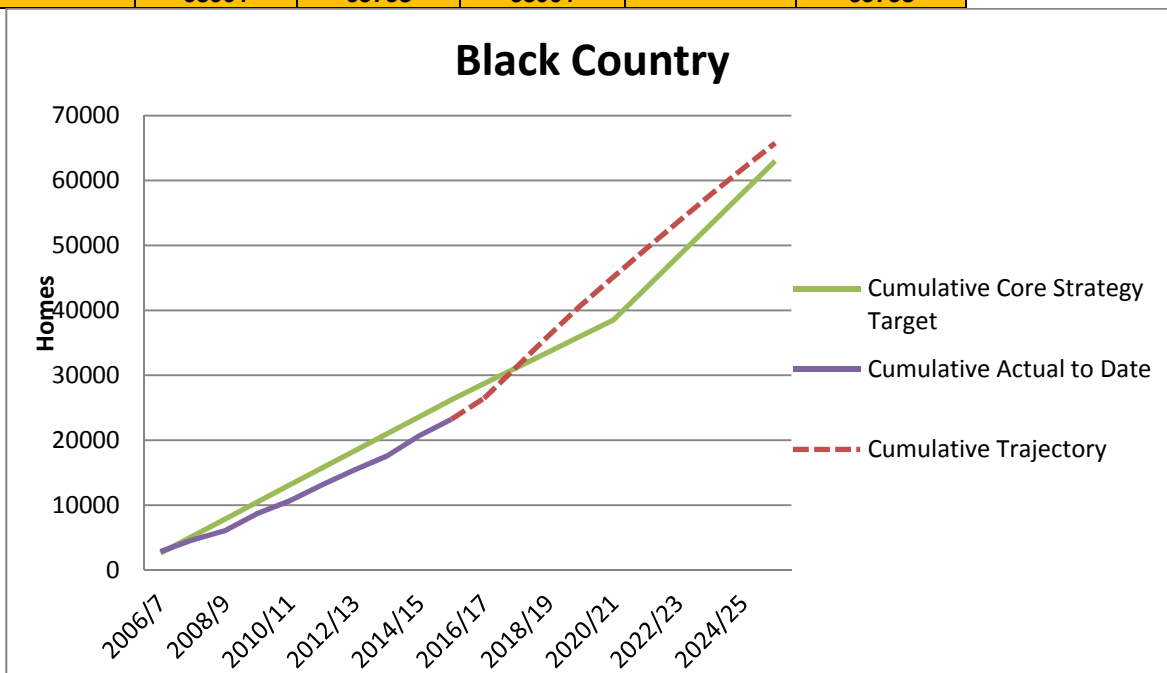


Black Country

## Appendix C   Black Country Monitoring Summary

| Net new homes | | | | | | |
|---|---|---|---|---|---|---|
| | Target Period / Year | BCCS / Local Authority Target | Completions at 2016 | | Overall Progress | |
| Dudley | | 8112 | 5652 | | -2460 | |
| Sandwell | | 7421 | 7168 | | -253 | |
| Walsall | 2006 -2016 | 5067 | 6137 | | 1070 | |
| Wolverhampton | | 5662 | 4266 | | -1396 | |
| **Black Country** | | **26262** | **23223** | | **-3039** | |

| High Quality Employment Land (ha) | | | | | | |
|---|---|---|---|---|---|---|
| | Target Period / Year | BCCS / Local Authority Target | Baseline (2009) Ha | HQ Ha at 2016 | Change in HQ at 2016 from Baseline | Overall Progress against target |
| Dudley | | 197 | 158 | 158 | 0 | -39 |
| Sandwell | | 289 | 174 | 174 | 0 | -115 |
| Walsall | 2016 | 149 | 98* | 122 | +24 | -27 |
| Wolverhampton | | 224 | 123 | 187 | +64 | -37 |
| **Black Country** | | **859** | **553** | **641** | **+88** | **-218** |

| Local Quality Employment Land (ha) | | | | | | |
|---|---|---|---|---|---|---|
| | Target Period / Year | BCCS / Local Authority Target | Baseline (2009) Ha | LEL Ha at 2016 | Change in LEL at 2016 from Baseline | Overall Progress against target |
| Dudley | | 580 | 669 | 602 | -67 | 22 surplus |
| Sandwell | | 923 | 1059 | 990 | -69 | 67 surplus |
| Walsall | 2016 | 519 | 731* | 616 | -115 | 97 surplus |
| Wolverhampton | | 526 | 629 | 486 | -143 | - 40 |
| **Black Country** | | **2548** | **3088** | **2694** | **-394** | **146 surplus** |

| Gross Employment Land (ha) | | | | | | |
|---|---|---|---|---|---|---|
| | Target Period / Year | BCCS / Local Authority Target | Baseline (2009) Ha | Gross Ha at 2016 | Change in Gross Employment Land at 2016 from Baseline | Overall Progress against target |
| Dudley | | 777 | 827 | 760 | -67 | -17 |
| Sandwell | | 1214 | 1251 | 1164 | -69 | -50 |
| Walsall | 2016 | 658 | 829* | 738 | -91 | 80 surplus |
| Wolverhampton | | 743 | 752 | 673 | -79 | -70 |
| **Black Country** | | **3392** | **3659** | **3335** | **-297** | **-57** |

| New Office Floor Space in Strategic Centres (sqm) | | | | | | |
|---|---|---|---|---|---|---|
| | Target Period / Year | BCCS / Local Authority Target | Completions at 2016 | Overall Progress Against Target | | |
| Dudley | | | 0 | | | |
| Sandwell | | | 13467 | | | |
| Walsall | 2006-2026 | 220,000 | 10368 | | | |
| Wolverhampton | | | 4409 | | | |
| **Black Country** | | | **28244** | **-191,756** | | |

| Additional Comparison Floorspace  (sqm) | | | | | | |
|---|---|---|---|---|---|---|

| | Target Period / Year | BCCS / Local Authority Target | Completions at 2016 | Overall Progress Against Target |
|---|---|---|---|---|
| Brierley Hill | | 65,000 | 0 | -65000 |
| West Bromwich | | 45,000 | 15593 | -29407 |
| Walsall | 2006-2021 | 60,000 | 3368 | -56632 |
| Wolverhampton | | 70,000 | 4333 | -65667 |
| **Black Country** | | **240,000** | **23294** | **-216,706** |
| **Hectares accessible open space per 1,000 population** | | | | |
| | Target Period / Year | BCCS Target | Baseline OS provision (Ha per 1000 population) | 2016 baseline OS provision (Ha per 1000 population) | Change in OS Provision (ha per 1000 pop'n) at 2016 | Overall Progress Against Target (Ha per 100 population) |
| Dudley | | 5.08 | 4.51 (2009) | 4.51 | 0 | -0.57 |
| Sandwell | | 4.42 | 3.42 (2007) | 3.90** | +0.48 | -0.52 |
| Walsall | 2006 - 2026 | 5.00 | 5.00 (2006) | 4.55 | -0.45 | -0.45 |
| Wolverhampton | | 4.74 | 4.63 (2007) | 4.95 | +0.32 | +0.21 |
| **Black Country** | | **19.24** | **17.56** | **17.91** | **0.35** | **-1.33** |

\* Walsall employment land 2009 baseline figures have been reassessed since adoption of the Core Strategy in light of more detailed information

\*\* Sandwell 2016 figure based on Green Space Audit 2013 and population figures from Census 2011

## Appendix D   Abbreviations

AAP      Area Action Plan

CIL       Community Infrastructure Levy

EDNA    Economic Development Needs Assessment

EIG       Environmental Infrastructure Guidance

HIA       Health Impact Assessment

HMA      Housing Market Area

NPPF     National Planning Policy Framework

OAN      Objectively Assessed Housing Need

SAD      Site Allocations Document

SHMA    Strategic Housing Market Assessment

SHLAA   Strategic Housing Land Availability Assessment