

Joint Core Strategy for the Black Country

Preferred Options Report

January 2008

Version 6

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1. Introduction

The Black Country Joint Core Strategy (the Core Strategy) will be the key document in the LDF Portfolio of planning documents for each local authority. It will be a spatial planning document that will set out the vision, objectives and detailed spatial strategy for future development in the Black Country up to 2026 along with specific strategic policies and targets. The document will not just consider land use, but also a comprehensive range of environmental, economic and social issues.

The Core Strategy is one of the first development plan documents to be produced within the sub-region. The four Black Country Local Authorities will also be preparing additional documents such as Area Action Plans (AAPs) and Site Allocations Development Plan Documents to assist with the delivery of the Spatial Strategy. The milestones for these documents are set out in the individual local authorities' Local Development Schemes.

The Black Country is an area facing considerable challenges over the next 20 years. It has a key role to play in delivering the housing growth and urban renaissance aspirations of the West Midlands Region. In order to achieve this it is essential to create an environment where people want to live and provide a wide range of job opportunities. The aim of the Core Strategy is to balance this high level of growth as well as protect and enhance the Black Country for future generations of residents.

The content of the document is as follows:

Chapter Two – How to Use this Document – sets out how we would like people to respond to the preferred options set out in the document.

Chapter Three – What is the Black Country Like Now? – sets out the context for the Core Strategy. It identifies the main characteristics of the Black Country and the aims of the Core Strategy in terms of the economy, environment and local communities.

Chapter Four – The Black Country in 2026: Vision, Spatial Objectives and Spatial Strategy – sets out the proposed Vision and Spatial Objectives for the transformation of the Black Country up to 2026 and how these will be delivered through a Black Country-wide preferred spatial strategy, illustrated in a key diagram, and detailed spatial strategies for areas of greatest change: the Regeneration Corridors and Strategic Centres. The Vision is made up of three directions of change – economic prosperity, sustainable communities and environmental transformation. A number of guiding principles for producing a more sustainable future for the Black Country are also proposed.

Chapter Five – Delivery – sets out how the Core Strategy will be implemented. It refers to the mechanisms necessary to manage land use change, identifies the key delivery agencies and major infrastructure requirements that will be required to implement the strategy.

Chapter Six – Directions of Change – sets out the policy areas we think we need to take forward into the Core Strategy. Each policy area has been allocated to one of the three directions of change identified in chapter 4.

Appendix One – Alignment of Community Strategies and the Core Strategy – sets out how the aims and objectives of the Core Strategy align with those set out within the four Black Country Sustainable Communities Strategies.

Appendix Two – Regeneration Corridor and Strategic Centre Spatial Options – This separate A3 document sets out the draft detailed spatial strategies for each of the Regeneration Corridors and Strategic Centres. When finalised, this section will form a key part of the Core Strategy, providing a “bridge” between the preferred spatial strategy and more detailed Development Plan Documents to be prepared by the four local authorities.

The following information is provided for each area:

- A ‘Vision’
- Main features and opportunities
- Summary of consultation responses regarding the area
- Explanation of the preferred option or options for the area, including how this has been developed and why any other options have been rejected
- A spatial diagram illustrating the key features of the preferred option or options, including broad locations for new development. This information is shown in diagrammatic form and does not identify specific site boundaries.
- Land use figures for the preferred option or options, including amount of high quality employment land, local employment land and housing numbers
- Key infrastructure requirements necessary to ensure delivery of the preferred option or options
- Potential development partners and mechanisms
- Sustainability Appraisal feedback
- Areas for further work to inform submission stage

2. How to use the document

This is the second document to be produced as part of the Black Country Joint Core Strategy process. The first document, the Issues and Options document, identified the key issues and options for the Black Country and a number of regeneration corridors within which the majority of land use transformation will take place. During July and August 2007, the Issues and Options were consulted upon with the aim of encouraging stakeholders and other organisations to become engaged with the process by responding to those issues and options and identifying new ones.

We received **????** representations from a variety of organisations and individuals, a summary of which we have posted on the Core Strategy web-site at <http://blackcountrycorestrategy.dudley.gov.uk>. An additional stakeholders event was held during October in order for organisations and individuals to make comments on the proposed development areas within the corridors. The results of this consultation exercise will also be published on the Core Strategy web-site and have been used to inform the Preferred Options document.

The results of the Issues and Options consultation and the Stakeholder event, along with some additional evidence gathering, have been used to provide more detail as to the required level of development within the regeneration corridors, along with the infrastructure and environmental issues necessary to facilitate this transformation.

Since the summer we have further refined our options. We have produced a document that:

- Sets out the key spatial options for shaping the development of the Black Country to 2026
- Proposes potential policy areas to help us make decisions regarding development proposals
- Identifies broad locations for new development, particularly housing and employment, within the Regeneration Corridors and Strategic Centres, along with potential infrastructure requirements
- Throughout the whole document, sets out clearly:
 - where one preferred policy or spatial option is proposed
 - where two or more options are proposed for further consultation and consideration prior to submission stage

However, this is not the final document and does not set out the detailed wording of policies. It has been produced to enable further discussions to take place and to seek feedback on the proposed options and policies for the future of the Black Country. This will help to inform preparation of the final Core Strategy document.

How to make your comments on the Preferred Options document

We would like to know what people think of the preferred options set out in this document, particularly any comments around the proposed policy areas and the broad

locations for development. We would also like to know if there is anything we have not addressed that you think is important. You can do this in the following ways:

By visiting the Black Country Core Strategy web-site and completing the questionnaire

By attending a local consultation event, details of which will be advertised within each local authority.

By visiting the planning offices and main libraries in each local authority, where copies will be available for inspection

Contact details for each local authority:

Directorate of the Urban Environment
Dudley MBC
3 St James's Road
Dudley
DY1 1HZ

Tel: 01384 [REDACTED]
www.dudley.gov.uk

Directorate of Planning and
Transportation
Sandwell MBC
Development House
Lombard Street
West Bromwich
B70 8RU
0121 569 [REDACTED]
www.sandwell.gov.uk

Urban Regeneration
Walsall MBC
Civic Centre
Darwall Street
Walsall
WS1 1DG

Tel: 01922 [REDACTED]
www.walsall.gov.uk

Planning Policy
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RP

Tel: 01902 554007
www.wolverhampton.gov.uk

SECTION EXPLAINING COMMENTS FORM / QUESTIONS

You can submit your comments by email or in writing.

Email: blackcountrycorestrategy@dudley.gov.uk
Write to: [REDACTED]

Your comments need to be received by us by the [REDACTED] 2008

What Happens Next

Once the consultation period is over, we will use all of the comments we have received to write the Submission Document. This document will be the final document of the Core strategy and will contain all of the objectives, policies and broad locations for development that we require to facilitate the transformation of the Black Country over the next 20 years. The Submission Document will be submitted to the Secretary of State who will appoint a Planning Inspector to examine the document to ensure that the document is fundamentally sound and will deliver the Black Country Vision.

The process for the production of the Core Strategy is shown below. The shaded boxes indicate those stages where we would like to hear your views.



3. What is the Black Country like now

The Black Country comprises the City of Wolverhampton and the Metropolitan Boroughs of Dudley, Sandwell and Walsall with a population of almost 1.1 million. It has a rich heritage, a distinctive character and strong communities, all of which contribute to the enterprise, dynamism, vitality and quality of life in the sub-region. Local communities have strong ties to their area and are justly proud of the Black Country's traditions and achievements. They also take pride in their heritage of miles of canals, quality architecture and open spaces.

The Black Country has many social and economic strengths particularly in terms of its cultural diversity and heritage. For example, it is home to more people of Black, Minority and Ethnic (BME) origin (15.2% of the total population) than the national average (9%). In addition, the area has some very attractive and popular residential neighbourhoods and contains natural, historic and environmental features of national and European significance as well as manufacturing companies of international renown. There has recently been growth in town and inner city living and significant developer interest in regenerating our centres and communities to create a better Black Country.

However, the local economy continues to perform poorly compared to similar areas elsewhere in the UK. It retains a strong manufacturing sector supporting 22% of total employment, but has failed to sufficiently attract new industries that are driving economic growth elsewhere in the UK. However, the Black Country's central location has helped it to begin attracting investment in logistics – a growing industry.

A £2.6 billion output gap with the rest of the UK has emerged and there are some 100,000 fewer skilled jobs today than in the 1970s. There are relatively few highly skilled, high earning people living and working in the Black Country. For businesses, there are few high quality sites providing good access to the national transport network as a result of the legacy of heavy industry and characterised by a large number of contaminated and derelict sites in the sub-region.

Although the situation is beginning to improve, the 2007 indices of deprivation continue to show some severe concentrations of deprivation in the Black Country, indicating that there is as great a need as ever for social, economic and environmental transformation and growth. The Regeneration Corridors identified in the Core Strategy generally run through areas of highest deprivation, and the spatial vision and strategy set out to transform each of those corridors will have a major impact on these deprived areas.

Meanwhile, the Black Country's major town centres are not achieving their full potential as hubs of retail, office and leisure activity and compete poorly with Birmingham and other surrounding centres. In addition, the many smaller centres that characterise the area have tended to decline.

For these reasons, the Core Strategy will seek to give clear direction to the attainment and delivery of **economic wealth and prosperity within the Black Country** as one of its central themes, providing certainty to ensure business confidence and secure the regeneration of our Strategic centres along with the network of smaller centres which exist across the sub-region.

For existing inhabitants of the Black Country, there is a lack of choice in the housing market, which also inhibits the sub-region in being able to attract the inward migration of households and retain the wealthier sections of the community.. Although many parts are dominated by uniform concentrations of relatively low priced private housing and very substantial concentrations of poor quality social rented housing, particularly within its inner areas, housing affordability and choice continues to be a problem for many of the Black Country's residents.

Therefore the Core Strategy will essentially be a housing growth strategy which will provide a pivotal role in delivering and enhancing **cohesive and sustainable communities within the Black Country**, facing up to climate change and supporting the principles of sustainability in order to reduce its effects.

The legacy of the Black Country's industrial past continues to dominate the image of the area. From the air, open spaces stand out – along valleys, railway lines, canals and hills – but on the ground many are inaccessible or poorly maintained. The poor quality of the urban environment undermines efforts to attract new industries and their employees to the area. The extent and pattern of congestion on key roads through the Black Country further degrades the environment and undermines public transport services.

The Core Strategy will therefore need to set a powerful agenda for the **environmental transformation of the Black Country** in terms of its environmental and heritage features as well as transportation network.

The public and private sectors have a strong and successful record of working together within the Black Country, and across the Birmingham, Coventry and Black Country City Region and the wider West Midlands Region, to deliver regeneration. However, the complexity of solutions required to create an urban renaissance and to pursue the necessary economic growth require even greater levels of co-operation. To this end, the City Region will provide an effective partnership approach in co-ordinating policies for regeneration to help the Black Country, as well as the wider metropolitan area, to secure the investment we need.

It is anticipated that through this Joint Core Strategy for the Black Country, and by improving the way we work with neighbouring authorities and across the wider region, we will start to achieve these central aims. The new approach will ensure that strategic policies for spatial planning, economic development, skills and employment, transport, regeneration, housing, the reduction of carbon emissions and environmental sustainability and quality of life are aligned and support and reinforce each other.

4. The Black Country in 2026: Vision, Spatial Objectives and Spatial Strategy

Vision and Spatial Objectives

The Core Strategy needs to be visionary, setting out how the Black Country should look in 2026 and establishing a clear direction for change in order to achieve this.

We are building on and taking forward other visions, notably the Regional Spatial Strategy for the West Midlands and its Phase 1 Revision, which was based upon the Black Country Study. The RSS and Black Country Study Visions reflect government policy and embody broad planning principles such as sustainable development, prioritising previously developed land for development, urban regeneration, protecting and enhancing the environment and promoting social inclusion and cohesion.

It is important that the Core Strategy builds upon the vision and objectives of the existing four Black Country Community Strategies, whilst influencing their development as they evolve into Sustainable Community Strategies. The Core Strategy objectives should add a spatial dimension to the Sustainable Community Strategy objectives. We have been working closely with our partners from the four Black Country Partnerships to develop a shared vision and objectives. Regard must also be had to the vision and objectives of other key documents, such as the Local Transport Plan and Regional Economic Strategy.

We are mindful of not 'reinventing the wheel' when so much work on visioning has taken place previously. The existing visions tend to share a number of similar themes, which need to be brought together to develop a shared vision and a flexible and robust strategy to address the issues identified for the Black Country. We want to take forward and add a strong spatial dimension to the existing visions, building upon the wide-ranging consultation which has taken place through the Issues and Options stage, to arrive at a clear direction of change for the Core Strategy to deliver. This should be aspirational, reflecting the transformation required to address the challenges facing the Black Country, relevant to the whole of the Black Country, yet locally distinctive. It should be supported by clear and deliverable objectives which reflect the RSS Phase 1 spatial strategy of focussing development and change in the regeneration corridors and strategic centres, but also cover the rest of the Black Country.

We have analysed and combined the existing visions to arrive at a proposed vision for the Core Strategy, which is made up of three main directions of change:

Black Country Joint Core Strategy Vision

1. Sustainable communities

We will create a network of cohesive, healthy and prosperous communities across the Black Country, with equal access to a mix of affordable and aspirational housing, a range of quality community services and an integrated transport network which reduces the need to travel by car.

2. Environmental transformation

We will deliver high quality, liveable and distinctive places, which respect and make the most of the existing diversity of the Black Country's natural and built

environment, particularly its canals and open spaces, and industrial and architectural heritage.

3. Economic Prosperity

We will make the most of the Black Country's accessibility and location to attract new employment opportunities and investment in innovation and new technology and deliver a network of successful strategic, town, district and local centres to improve the wealth and image of the Black Country.

Achieving this vision will require delivering a number of over-arching guiding principles:

1. Facing up to climate change: Meeting the requirements of RSS Policy CC1: Climate Change by ensuring that the spatial approach to development both minimises climate change impacts and is 'climate changed proofed' by taking into account, through mitigation and adaptation, predicted changes to the climate of the Black Country.
2. Sustainable Development: ensuring that development meets the social, economic and environmental needs of the present without compromising the ability of future generations to meet their own needs.
3. The 'Brownfield First' principle: ensuring that previously developed land is prioritised for development over Greenfield sites.

The RSS Phase 1 Revision has already established general policies and proposals for the Black Country which will help to ensure that these guiding principles are met. For example, the vast majority of housing growth will take place on brownfield land, concentrated close to existing public transport nodes to minimise climate change impacts. Significant new green infrastructure will be created within developments, which will help to mitigate climate change effects and create new greenfield resources. Where proposals throughout this document particularly contribute towards meeting the guiding principles this is highlighted in the text.

To ensure that the vision becomes a reality a set of spatial objectives have been developed:

Black Country Joint Core Strategy Spatial Objectives:

The Core Strategy will have assisted in the delivery by 2026, across the Black Country, of the following:

1. **Focussed investment and development in comparison shopping, office employment, leisure, tourism and culture within the four Strategic Centres: Brierley Hill, Walsall, West Bromwich and Wolverhampton, to retain and increase their share of economic activity and meet the increasing aspirations of their catchment areas.**
2. **A restructured sub-regional economy which provides sufficient 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.** This will have resulted in sustained economic growth and an increase in the choice of jobs available in the Black Country's economy.

3. **Model sustainable communities on redundant employment land in the Regeneration Corridors**, that make the most of opportunities such as public transport and canal networks, are well served by residential services and green infrastructure, have good transport links to retained employment areas and centres, are set in a high quality natural and built environment and are well integrated with surrounding areas.
4. **Enhancements to the character of the Black Country's existing housing areas** by protecting and improving high quality residential areas and pursuing a sustained and focussed programme of housing renewal in low quality residential areas requiring intervention.
5. **A network of vibrant and attractive district / local centres** across the Black Country; each offering an appropriate choice of facilities. The historic character of these centres will be protected and enhanced through sensitive housing led development and environmental improvements to create safe, attractive streets and spaces.
6. **A high quality environment** fit for the future; respecting, protecting and enhancing the unique biodiversity and geodiversity of the Black Country and making the most of its assets - canals, beacons and open space - whilst valuing local character and the legacy of the Black Country's industrial past.
7. **A first-class transport network providing rapid, convenient and sustainable links between the Strategic Centres, existing and new communities, and employment sites**, To include an enhanced, integrated public transport system, an improved road network, and a system of walking and cycling routes linked to the green infrastructure network. Improvements to the national M5 and M6 motorways network and freight railway network will help deliver regional connectivity.
8. **A sustainable network of community services, particularly lifelong learning, healthcare and sports facilities**, which are easily accessible to all residents, resulting in an increase in levels of qualifications, skills, health and well-being and a decrease in deprivation indicators across the Black Country.
9. **Sufficient waste recycling and waste management facilities in locations which are the most accessible and have the least environmental impact.**

Appendix 1 summarises the main linkages between the objectives and aims of existing Black Country Community Strategies / Plans and the spatial objectives set out above.

Preferred Spatial Strategy

Spatial options for the Black Country are limited by the RSS Phase 1 Revision, which sets out a clear spatial strategy for concentrating redevelopment and change in a network of key corridors and four Strategic Centres – Brierley Hill, Walsall, West Bromwich and Wolverhampton. Figure x, now adopted as part of RSS, sets out the broad elements of this strategy.

Figure x

BLACK COUNTRY



KEY TO BE INSERTED

The Key Diagram on page x illustrates the preferred spatial strategy for the Black Country Joint Core Strategy at Preferred Options stage. This provides a greater level of detail than Figure x and is supplemented by very detailed plans for each Regeneration Corridor and Strategic Centre, set out in Appendix 2. The Key Diagram shows how the main proposals for the Strategic Centres and Regeneration Corridors fit together and interact with proposals for other areas. It brings together Black Country-wide proposals which were set out on separate plans in the Issues and Options report e.g. Housing Market Intervention Areas and Beacons signalling Black Country identity, updated where necessary in the light of consultation responses or technical evidence, and includes new proposals (e.g. Housing Renewal Hubs) where appropriate. Three Core Spatial Policy Areas are proposed to accompany the Key Diagram, covering the Strategic Centres, the Regeneration Corridors and free-standing employment sites, and other areas.

Strategic Centres

Core Spatial Policy Area 1 – The Role of the Strategic Centres

NOW WORDED SO AS TO COMPLETELY REPLACE CPA 38

By 2026 the four Strategic Centres will have a far stronger role at a regional and sub-regional level, providing:

- at least 40% more retail floorspace and 140% more office floorspace combined than currently
- 5,900 new homes – the majority built at very high densities as part of mixed use developments*
- excellent public transport links making them accessible to an increased catchment, including new residential communities in the Regeneration Corridors.

We think we need core policies to explain the role that the Strategic Centres, collectively and individually, will play in the transformation of the Black Country by 2026. This policy should contain explicit links to the detailed spatial strategy for each Strategic Centre, and to any existing or proposed Area Action Plans covering the Strategic Centres.

The policies should set out:

- The common roles of the Strategic Centres:
To provide a balanced network of higher order centres well placed to serve the needs of all Black Country residents by 2026, and served by strong public transport hubs to maximise use of the public transport network by residents, workers and visitors;
To act as a focus for and deliver significant growth in retail, offices and very high density housing – making them the major concentrations of redevelopment and regeneration in the Black Country up to 2026;
The principal locations for major cultural, leisure, entertainment and community facilities, providing the widest possible range of such facilities commensurate with their catchment;
To provide convenience shopping and local services for the increasing number of residents living within and close to each centre;
Overall, to provide the right mix of facilities, homes and jobs, set in a high quality built and natural environment, to attract significantly more people to live and work in the Black Country
- The distinctive strengths and unique opportunities provided by each Strategic Centre;
Wolverhampton - the traditional capital of the Black Country at the heart of the public transport network, with the largest concentration of office employment and major shopping, university and administrative functions and potential for further expansion;
Walsall – blend of industrial heritage and new development, evening economy and cultural offer;
Brierley Hill – major shopping and commercial leisure destination with office and residential quarters and potential for expansion subject to public transport improvements
West Bromwich – shopping and office functions with new leisure and commercial facilities and potential for expansion
- How each Strategic Centre will contribute towards creating a strengthened, balanced network of centres across the Black Country, in particular by setting out:
 - How delivery of the amounts of comparison retail and office development proposed in RSS for each Strategic Centre will be managed The nature and extent of land use change required by 2016 and by 2026 in each Strategic Centre, including any necessary expansion.

*excludes West Bromwich Town Centre, which falls within Regeneration Corridor 12

Consultation Responses from Issues and Options Paper

The consultation responses recognised centres and town centre uses as playing an important role in regeneration and particularly recognised the importance of the Strategic Centres as engines of economic development best-placed to attract investment in comparison shopping, leisure and office development. They also supported the view that the Black Country's centres are generally weaker than those in surrounding areas and are themselves in need of regeneration, including a better mix of facilities and environmental and transport improvements.

Almost all respondents considered that the strategic centres should be developed / regenerated with investment in comparison shopping, leisure and culture and office employment, and that this should be planned and promoted to serve the needs of the Black Country's centres and catchments. Many recognised this approach as an

important element of a long-term regeneration strategy for the whole of the Black Country.

The majority of respondents considered development should be managed to try to ensure that each of the strategic centres would get its share of development, some suggesting mechanisms for this based on phasing and monitoring. A minority felt to try to manage development would lead to investment being lost from the Black Country.

Brierley Hill was felt to be able to attract development that might not otherwise come to the area, whilst it was argued Wolverhampton is best-placed to be the 'city' for the Black Country. Some respondents also pointed to the need to improve Walsall and West Bromwich. There was agreement that the strategic centres should be the locations for entertainment investment. Residents tended to express the view that smaller centres should be regenerated to at least the same extent as the larger centres.

Spatial Options Considered but Rejected

No alternative options proposed.

Regeneration Corridors and Free-Standing Employment Sites

Core Spatial Policy Area 2 – The Role of the Regeneration Corridors and Free-Standing Employment Sites

By 2026 the network of Regeneration Corridors linking the Strategic Centres will provide:

- 1400 ha of high quality employment land concentrated within easy reach of the motorway network – 1000 ha of which will need improvements to reach a high quality standard
- 36,150 – 37,040 new homes (in addition to current commitments) * ¹ in sustainable communities built on redundant employment land close to existing public transport routes and canal networks - 33-50% of this will be family housing at moderate densities and 67-50% for smaller households at higher densities
- 945 - 970 ha of retained local employment land ²

We think we need core policies to explain the role that the Regeneration Corridors, collectively and individually, will play in the transformation of the Black Country by 2026. This policy should contain explicit links to the detailed spatial strategy for each Regeneration Corridor, and to any existing or proposed Area Action Plans covering the Regeneration Corridors.

The policies should set out:

- The main roles of the Regeneration Corridor network:
The most extensive areas of redevelopment and regeneration in the Black Country up to 2026;
To provide a sustainable mix of modern, high quality employment land and new residential communities set within an attractive green infrastructure network;
The focus for existing, new and improved public transport routes and hubs which will maximise use of the Black Country public transport network by residents, workers and visitors;

To create strong links with and spread regeneration benefits to surrounding communities and the network of centres – knitting together old and new to create a richer, varied and integrated whole.

- The principle of focusing new housing growth within the Regeneration Corridors in locations with easy access to high frequency public transport services or larger centres, with the highest housing densities concentrated in the most accessible locations;
- The distinctive strengths and unique opportunities provided by each Regeneration Corridor, and how they will complement and link with each other;
- The nature and extent of land use change required by 2016 and by 2026 in each Regeneration Corridor;

By 2026 free-standing employment sites across the Black Country will collectively provide:

- 170 - 200 ha of retained local employment land ²
- 2790 – 3680 new homes ¹
- 15 ha of high quality employment land

We think we need a core policy to explain the role that the free-standing employment sites will play in the transformation of the Black Country by 2026, setting out:

- Their main functions: to provide local employment opportunities to serve communities outside the Regeneration Corridors and Strategic Centres and a supply of housing land at appropriate densities;
- The nature and extent of land use change required by 2016 and by 2026 in the free-standing employment sites for each local authority area;
- Criteria for protection / allocation for housing to be applied when preparing Allocation and Area Action Plan DPD's.

* includes West Bromwich Town Centre, which falls within Regeneration Corridor 12

¹ dependent on preferred spatial option selected for RC4 and free-standing employment sites in Wolverhampton

² dependent on preferred spatial option selected for RC4 and free-standing employment sites in Wolverhampton and preferred spatial option selected for RC6

Consultation Responses from Issues and Options Paper

The Issues and Options report drew together the overlapping employment and housing corridors defined in the Black Country Study to form a series of Regeneration Corridors, and set out land use changes likely by 2026 in each Regeneration Corridor, and free-standing employment sites outside the Corridors, under two spatial options. The Regeneration Corridor boundaries broadly reflected the existing distribution of large chunks of employment land across the Black Country. The free-standing employment sites were considered too small or isolated to be considered individually – but were grouped together as a significant source of regeneration opportunities.

The spatial options (Options 1 and 2) were focused around two key issues arising from RSS Phase 1 - the need to create and protect more high quality employment land, whilst ensuring the allocation of sufficient lower quality employment land for large-scale housing development to meet housing growth aspirations.

The Issues and Options Report identified 1250 ha of employment land as existing (600 ha) or potential (650 ha) high quality and both Options involved improvement and protection of these core employment areas. **Text regarding I&O responses on need for sites outside BC to make up any shortfall** Applying new high quality employment land criteria developed in the light of Issues and Options consultation responses and further

technical work (see Core Policy Area 36 – Provision of High Quality Employment Land) the Preferred Spatial Strategy now proposes protection of 1415 ha high quality employment land, which is sufficient to meet identified need of 1200-1400 ha without requiring high quality employment land outside the Black Country to meet its economic needs. However, only 415 ha of this is existing high quality, leaving 1,000 ha requiring a range of improvements (ranging from minimal environmental enhancements to major new access points and wholesale, long-term redevelopment).to reach high quality standard by 2026. Achieving improvement across such an extensive area of employment land will be a considerable challenge and require a well-resourced partnership approach. A number of the high quality employment locations will act, in the medium term, as relocation sites for firms displaced to make way for new housing allocations.

The Option 1 spatial strategy maximised retention of local employment opportunities for the longest possible time by concentrating high density housing development (average 45 dwellings per hectare gross) in a limited number of the sustainable locations. The Option 2 spatial strategy promoted more comprehensive and rapid redevelopment of local employment land for housing at moderate densities (average 35 dwellings per hectare gross) to secure a much wider range of housing types.

The Issues & Options consultation generated equal support for both Options, but also significant support for a balanced mix of both Options based on local circumstances and individual comments proposing Option 1 or 2 in specific corridors. This has provided a clear steer that the preferred spatial strategy should strike a middle path in order to gain the widest range of benefits, applying a mix of Options 1 and 2 to Regeneration Corridors and free-standing employment sites across the Black Country depending on local characteristics, particularly sustainable transport access. It was also commented that monitoring could be used to trigger a policy review if the strategy started veering towards one extreme. The preferred spatial strategy does deliver a mix of Option 1 and 2 approaches across the Black Country (see table x below). Although less local employment land is proposed for retention (1115-1170 ha) across the Black Country, than in the Issues and Options Report (1300-1500 ha), this is supported by the employment technical work.

Consultation responses regarding individual Regeneration Corridors did not reveal any particular pattern or common criteria for applying Option 1 or 2. For example, Option 1 was particularly supported for Regeneration Corridors 6 & 7 in Walsall, which have limited public transport access, and Option 2 was promoted for Regeneration Corridors 4 & 8 in Wolverhampton and Sandwell, which are on the existing metro line. The importance of the canal network in providing a “backbone” for most of the Regeneration Corridor network was noted.

Spatial Options Considered but Rejected

Few alternatives to Options 1 and 2 were put forward and these were supported by a limited number of consultees. This reflects the substantial progress that has already been made in developing a spatial strategy for the Black Country through RSS Phase 1.

The key alternative put forward was sustainable urban extensions involving release of green belt land for housing, in particular at Holbeache Lane, Dudley & Grassy Lane / Black Halve Lane, Wolverhampton. However, the combined capacity of identified sites would be small and consultees admitted that it should be subject to phased release to ensure urban regeneration objectives are not prejudiced. Green belt land does not fall

within the Major Urban Area as set out in RSS and so any such release would be contrary to fundamental RSS objectives.

Proposals were also put forward for greenfield sites. The release of large greenfield sites for housing does not accord with the RSS spatial strategy for the Black Country.

Detailed Spatial Options for Regeneration Corridors and Strategic Centres

The Issues & Options Appendix listed features, opportunities, and illustrative distribution of land-uses by 2026, under Options 1 and 2 for each regeneration corridor, and provided broad targets for the strategic centres. However, consultation responses encouraged further development of this approach to create comprehensive spatial plans for each regeneration corridor and strategic centre, illustrating how options could look “on the ground”. This work has progressed since summer 2007, informed by the Issues & Options consultation responses, emerging technical work and on-going dialogue with key stakeholders, including an event for key delivery partners on 17th October 2007.

A spatial vision for each individual regeneration corridor and strategic centre has been developed, in the context of the spatial objectives set out above. Detailed spatial plans have been prepared, accompanied by explanatory text, setting out broad areas proposed for land use change. This has involved taking into account and addressing a wide range of issues such as making the most of existing infrastructure (e.g. centres, public transport, open space, community facilities) and identifying key constraints and necessary infrastructure improvements to serve new development. Appendix 2 sets out the current proposals regarding these detailed spatial plans, and table x provides a summary of the main features and proposals. It is intended that the spatial plans and text will form part of the Submission Core Strategy, subject to any necessary amendments arising from consultation responses and further work to be carried out on some issues.

Table x Summary of Main Proposals for Regeneration Corridors and Free-Standing Employment Site

Regeneration Corridor (total employment land including commitments)	Typology	Preferred Option (for uncommitted employment land)*
RC1: Pendeford / Fordhouses (74 ha)	Employment – led (100% - all high quality)	Not applicable
RC2: Stafford Road (132 ha)	Employment – led (61% – majority high quality)	Mostly Option 2
RC3: South of Wolverhampton City Centre (53 ha)	Housing – led (50%)	Mostly Option 2
RC4: Wolverhampton – Bilston (358 ha)	Employment – led (54% - majority local)	Not yet determined
RC5: Loxdale-Moxley (83 ha)	Employment – led (100% - all high quality)	Not applicable
RC6: Wednesfield – Willenhall – Darlaston	Employment – led (81-87% - majority high quality)	Not yet determined

Regeneration Corridor (total employment land including commitments)	Typology	Preferred Option (for uncommitted employment land)*
(430 ha)	quality)	
RC7: Bloxwich – Birchills – Bescot (203 ha)	Employment – led (86% - majority local)	Option 1 / 2 Mix
RC8: Hill Top (437 ha)	Employment – led (60-67% - majority high quality)	Mostly Option 1
RC9: Tipton – Dudley Port – Brades Village (261 ha)	Housing – led (79%)	Option 2
RC10: Pensnett – Kingswinford (157 ha)	Employment – led (87% - majority high quality)	Option 2
RC11: (North) Dudley – Brierley Hill (200 ha)	Employment – led (75% - majority high quality)	Option 1 / 2 Mix (Option 1 near town centres)
RC11: (South) Brierley Hill – Stourbridge (105 ha)	Housing – led (75%)	Option 1 / 2 Mix (Option 1 near town centres)
RC12: Oldbury – West Bromwich – Smethwick (550 ha)	Employment – led (82% - majority high quality)	Option 1
RC13: Rowley Regis – Jewellery Line (219 ha)	Housing – led (74%)	Mostly Option 1
RC14: Coombs Wood – Halesowen (110 ha)	Employment – led (88% - majority high quality)	Mostly Option 2 (Option 1 near town centres)
RC15: Brownhills (65 ha)	Employment-led (85% - all local employment)	Option 1 / 2 Mix
RC16: Coseley – Tipton – Princes End (109 ha)	Housing – led (63%)	Mostly Option 2
Aldridge Free-standing Employment Sites (135 ha)	Employment – led (100% - all local employment)	Not applicable
Other Free-standing Employment Sites (186 ha)	Housing – led (56 – 72%)	Not yet determined
Overall (3867 ha)		Option 1: 73-52% Option 2: 34-48%%

As part of the Issues and Options process, the boundaries of some Regeneration Corridors have been altered and two “new” Regeneration Corridors have been added:

- RC15: Brownhills - three industrial estates clustered around Brownhills Town Centre in the north-east of Walsall (previously classified as free-standing employment sites); and

- RC16: Coseley - Coseley Local Centre (previously southern tip of RC4) down to the northern edge of RC9 (previously free-standing employment sites)

Brownhills does not fall within the Regeneration Corridors shown in Figure x. This area has been designated as a regeneration corridor in response to comments from the local community, land-owners and developers and specific site proposals. West Bromwich is the only Strategic Centre falling within a Regeneration Corridor (RC12).

A number of Regeneration Corridor boundaries have been adjusted to include free-standing employment sites, to create a more coherent and detailed spatial strategy. A large proportion (135 ha) of the remaining 300 ha of free-standing employment land is located in Aldridge. The policy approach towards this area has been determined through its comprehensive protection to provide local employment land, as shown on the key diagram. The proposed approach towards protection / release of a number of other free-standing employment sites is illustrated on the Key Diagram, where it has been judged appropriate to go to this level of detail.

Spatial Options Considered but Rejected and Remaining Spatial Options

In moving from two Options to a Preferred Spatial Strategy, it was judged that, for most of the regeneration corridors, only one Option would be compatible with the spatial objectives at a local level. Some regeneration corridors include large areas of valuable existing or potential high quality employment land, leaving limited options for other uses. In other cases, options have been limited by progress on Development Plan Documents e.g. West Bromwich AAP.

However, for RC4: Wolverhampton – Bilston, RC6: Wednesfield – Willenhall – Darlaston, and Wolverhampton City Centre there are still spatial options to be explored. Preferred Options is the appropriate stage to consult on these options, to allow the selection of a preferred spatial option to feed into the submission Core Strategy.

Options 1 and 2 for RC4 are linked to Options A and B respectively for free-standing employment sites in Wolverhampton. Option 1 for RC4 involves maximum provision of housing at high densities and minimal release of free-standing employment sites for housing in Wolverhampton. If Option 2 is pursued for RC4, generating less housing on the same area of land at moderate densities, 30 ha extra free-standing employment sites will need to be released to meet housing targets, also at moderate densities given their location. The Option selected for RC4 will inform preparation of an Area Action Plan.

For Wolverhampton City Centre, the three Options developed show how the same scale of development can be achieved through different balances of land uses between regeneration opportunity areas. The Option selected will inform preparation of an Area Action Plan.

For RC6, 27 ha more local employment land is released for housing under Option 2 than Option 1. As Option 1 involves high density housing and Option 2 moderate density, both Options generate the same housing capacity.

A preferred spatial option is put forward in this document for all other Regeneration Corridors and for Brierley Hill and Walsall strategic centres. Reasons for selection of the preferred option and rejection of any alternative options, where these are judged to exist, are set out in the text.

The preferred spatial option ultimately chosen for RC4, RC6, Wolverhampton City Centre and free-standing employment sites in Wolverhampton will only materially affect the overall spatial strategy in terms of the relative proportions of moderate and high density housing provided. As set out in table X, at one extreme, equal amounts of moderate and high density housing would be provided, and at the other, one third would be moderate and two thirds high density.

Question – Which spatial option do you think is most appropriate for:

RC4: Wolverhampton – Bilston / Free-standing employment sites in Wolverhampton	Option 1 / Option A or Option 2 / Option B?
RC6: Wednesfield – Willenhall – Darlaston	Option 1 or Option 2?
SC1: Wolverhampton City Centre	Option 1, Option 2 or Option 3?

Before answering these questions please refer to Appendix 2 for details of each spatial option and to Core Policy Area 7 for evidence of the types of households likely to need new housing.

Areas Outside the Strategic Centres and Regeneration Corridors

Core Spatial Policy Area 3 – Approach to Development outside the Strategic Centres and Regeneration Corridors (excluding free-standing employment sites)

By 2026, the areas outside the Strategic Centres and Regeneration Corridors will provide:

- A strong Green Belt to promote urban renaissance within the urban area and provide green lungs for urban residents
- A mix of quality residential areas with no significant low quality areas
- A strong network of green infrastructure, centres and community facilities
- Strong and seamless links to regenerated areas in Regeneration Corridors and Strategic Centres
- A constant supply of small-scale development opportunities through windfalls and local allocations

We think we need core policies to explain the approach to development in areas outside the strategic centres and regeneration corridors (excluding free-standing employment sites) and the role that these areas will have to play in the transformation of the Black Country by 2026.

The policy should set out:

- Particular approaches to be taken to development proposals in certain types of area:
 - Green Belt – maintenance of boundaries and protection from inappropriate development
 - High Quality Residential Areas – promotion of new housing development only where this accords with local character
 - Housing Market Intervention Areas – focus for housing renewal activity

- Sub-regional green infrastructure network – focus for green infrastructure improvements
- Centres – protection and enhancement of the network
- The broad approach to be taken to development in other areas – prioritise brownfield and most accessible locations; avoidance of flood risk areas
- Exceptional approach required to deliver particular sub-regional scale developments e.g. sports beacons located outside Strategic Centres

Consultation Responses from Issues and Options Paper

Many of the designations shown on the Key Diagram outside the Strategic Centres and Regeneration Corridors are referred to in detail under individual Policy Areas in Section 6. Green Belt is covered in paragraphs xx above (Regeneration Corridors - alternative options)

5. Delivery and Monitoring – implementing the spatial strategy

The Black Country Core Strategy is a forward looking growth orientated strategy aimed at delivering a restructured, regenerated and more attractive Black Country at a scale and pace of transformation never before seen.

This section will describe how the Joint Core Strategy will be implemented. It will refer to the mechanisms necessary to manage land use change, and identify the key delivery agencies and major infrastructure requirements that will be required to implement the Strategy. The demands on the infrastructure will be both challenging and unique.

The aim of this section of the Preferred Options document is to respond to the increased emphasis placed on the need to demonstrate how the policies of the Joint Core Strategy will be delivered, particularly with regard to delivering the transformation of the regeneration corridors and the infrastructure required to serve this new development, particularly the housing numbers.

As part of the ongoing Core Strategy process, and in the lead up to submission to the Secretary of State, the four Black Country Authorities are commissioning work to ensure that the emergent preferred strategy is deliverable and achievable in the appropriate timescale. In doing so, the work must identify responsible authorities as delivery agents and identify whether agents are suitably resourced to deliver the strategy and to identify any impediments to the delivery of the strategy.

There has already been a certain degree of evidence prepared during the preparation of the Black Country Study (in the shape of the Delivery Plan) as part of the Phase 1 revision to the Regional Spatial Strategy (RSS). There is also a delivery plan prepared to underpin the submission Phase 2 revision of the RSS. These documents set out a fundamental core of base evidence upon which to draw down further evidence to support the detail set out in this Core Strategy.

During the production of the Joint Core Strategy, the four Authorities have also commissioned numerous other pieces of evidence, for example evidence on retail assumptions, employment land and housing data. These have helped shape the document into its current form. Other pieces of evidence have been prepared to run in parallel with the preparation of the Core Strategy and have been acting as checks to ensure the Strategy does not have unintended consequences. For instance, there is the Strategic Flood Risk Assessment and the Habitats Regulations Assessment or Appropriate Assessment. It is essential that these pieces of work are assessed and any implications considered in the infrastructure work to be carried out as well as being fully reflected in the submission of the Core Strategy.

The Joint Core Strategy Issues and Options paper, published in June 2007, concentrated on the need for joint working between a range of public and private sector delivery agencies. The document set out where Partnership working is currently taking place, namely:

Black Country Consortium	Delivery Plan Framework and prospectus and the Green Infrastructure Strategy
Advantage West Midlands	Through the Regeneration Zone Implementation Plan
English Partnerships	Through the development of a brownfield land action plan
Urban Living	Through HMRA in Smethwick and West Bromwich
Evolve	Through potential housing renewal work across the Black Country
RegenCo	Working with Sandwell MBC to assist with the regeneration of West Bromwich and Smethwick
Walsall URC	Working with Walsall MBC to assist with the regeneration of the Borough
Wolverhampton URC	Working with Wolverhampton City Council to assist particularly with the regeneration of Wolverhampton City Centre and the Stafford Road Corridor

In addition to this on-going work, the four local authorities will also help landowners and developers to put together proposals that meet the requirements of the Joint Core Strategy and future Development Plan Documents and Area Action Plans. The Councils will also aid developers through encouraging early pre-applications discussions and negotiation on planning obligation agreements.

Core Policy Area ? – Delivering the Strategic Vision

The Core Strategy will ensure that a continuous supply of housing and employment land will be available during the plan period to meet the needs of the Black Country. The phased release of this land will be consistent with the WMRSS, the sequential approach in PPS3, the suitability and availability of sites across the Black Country and the delivery of sustainable development.

The Regeneration Corridors will be the major source of land use change within the Black Country, with currently occupied employment land being the largest potential source of net additional housing capacity in the Black Country.

The preferred spatial strategy identifies broad locations within the regeneration corridors for the release of employment land for housing (see appendix two), with additional

potential for the release of free-standing employment sites for housing in sustainable locations.

In conjunction with the Core Strategy the 4 local authorities will begin the production of Site Allocations documents and Area Action Plans which will define in more detail the actual sites to be redeveloped for housing, employment and other associated uses. Potentially there are 2 options for the phased release of employment land:

- Through individual Local Authority Allocations Development Plan Documents produced in two 10 year phases : 2006-2026 and 2016-2026. These documents will ensure an appropriate release of sites that will not cause unnecessary blight of employment land across the Black Country.
- By allocating all of the capacity 2006 - 2026 in one single Allocations Document for each local authority. Taking this approach increases the risk of blighting, which in turn could lead to a lack of investment. However, this approach will provide developers sufficient time to assemble sites.

Which of these 2 options will provide the most sustainable development?

It may also be necessary to rely on the existing planning pipeline and some windfall development during the early years to enable an appropriate lead in time for the larger, strategic development sites. In addition, the delivery of new housing sites must be timed in such a way as to ensure that the supporting infrastructure is in place, particularly with regard to jobs, schools, health care provision and recreation etc. The Phasing Programme will need to concentrate resources in particular areas and ensure that the delivery of major new developments will not cause too much disruption for new and existing residents.

Flexibility in the Supply of Housing Land

The current level of housing capacity contained within the Preferred Options document represents what the Black Country can deliver with the resources currently available. This is sufficient capacity to meet the requirement set out within the RSS Phase 2 submission document.

The Black Country Core Strategy is essentially a housing growth strategy within the Major Urban Area and, in order to reach this level of capacity, we have identified sufficient land to meet our employment land requirements releasing the surplus poorer quality land for potential new housing development.

In addition to this predicted employment land requirement, we have retained an additional 30% of our existing employment land as a buffer in case the requirements for such land increase over the period of the Core Strategy to allow for any circumstances not envisaged within the technical evidence base.

In addition, the release of this surplus employment land has been phased to ensure that the economic welfare of the Black Country is not adversely affected through premature release of large amounts of employment land in a short time period. A consequence of phasing the release of employment land is that some of the identified capacity may not come forward until after 2026 (beyond the time period of the plan). This also accounts

for approximately 30% of industrial and employment premises over and above the land requirements predicted within the technical evidence base.

We therefore believe that we have some flexibility relating to the capacity which has been phased beyond 2026. Some or most of this supply could be brought forward for development between 2016 and 2026. However, realising this additional capacity will be dependant on a number of issues, some of which are beyond the influence of the Core Strategy and the planning system. These include the economic position of the Black Country at the time, the ability and resources to undertake land assembly and industrial relocations through, for example, Compulsory Purchase Orders and the level of assistance we can expect from other organisations and partners, including the government over the time period of the Core Strategy.

The progress made in delivering the Core Strategy, and enabling these areas of employment land to come forward more quickly, will need to be carefully and regularly monitored to ensure that the flexibility existing within the Core Strategy remains.

Employment Land Release

The West Midlands Regional Spatial Strategy acknowledges that significant amounts of land currently in use or allocated for employment purposes will need to be developed for housing. It also provides that the release of former employment sites for housing will only be considered where sufficient employment land of appropriate type and quality remains. Work concerning the levels of high quality employment land has been carried out for the Black Country Employment Land Capacity Study Update (2007). This work has been used to identify those areas of land without any future employment potential that will be released for housing development over the next 20 years. The phased release of employment land will need to be carefully thought out so as not to create unemployment hotspots across the sub-region.

Infrastructure

Core Policy ?? Provision of Infrastructure

The Core Strategy will contain a policy that ensures that we provide infrastructure and energy requirements to meet the scale of development set out by the Preferred Spatial Strategy. There is a need to include active engagement with the water companies to ensure that areas of significant change and redevelopment can accommodate and be supplied by sufficient energy supplies and resources to meet current and future demands.

There are a number of issues to be considered when assessing infrastructure requirements, most notably:

- **Development capacity opportunities**
 - Capacity of existing road infrastructure to cope with pressure caused by new development and identification of remedial work/strategy required
 - Capacity of existing public transport network to cope with pressure caused by new development

- Capacity of services and public utilities to cope with pressure caused by new development – sewers, electricity, gas, water
- Understanding of geotechnical evidence to determine the broad development that would need to be covered
- Understanding of broad contamination issues on a broad range of sites to determine whether sites can be readily available
- **Delivery of development and investment**
 - Ability of areas to be economically viable and where sector involvement is required for funding, the willingness of the agency/partner to commit to delivery
 - Options for delivery of development and the infrastructure needed to support it set aside the risks for options
- **Environmental capacity**
 - Capacity of environmental assets to withstand development pressures
 - Ability of assets to contribute off setting development pressures
 - Implications for the climate change
 - Understanding and implications of water cycle strategy

The four Black Country Authorities are commissioning work that will assess existing work on infrastructure provision, particularly the RSS Phase 2 Study and the Black Country Delivery Plan. Following on from that, the work will identify the capacity of the existing infrastructure, a list of requirements to ensure that the development would not cause an unintended consequence on the region's infrastructure network and details of the likely costs and delivery agents or partners that would be required to deliver the Spatial Strategy. It is anticipated that this work will be available to inform the Submission Document.

Monitoring Framework

Monitoring has an important role in the overall development plan process and there is a requirement of the new planning system that the LDF be continually reviewed and revised to ensure that it is kept up-to-date. The Annual Monitoring Report is the main mechanism for reviewing the effectiveness of the saved policies from the UDP and the policies that will emerge in future Local Development Documents, and identifying the need for change. The AMR will takes place annually and is published in December of each year.

This Monitoring Framework provides a range of indicators and targets, linked to the policies and options being developed. A detailed breakdown of the indicators and targets is contained within appendix ?? Each year an updated Framework will be appended to the AMR, incorporating any additional indicators required to monitor new Development Plan Documents (DPD's).

The Monitoring Framework also provides the basis for monitoring the Sustainability impacts of the Core Strategy predicted in the sustainability appraisal Report (SA).

The Monitoring Framework will help to answer questions like:

- Are policies achieving their objectives and in particular are they delivering sustainable development?
- Have policies had unintended consequences?
- Are the assumptions and objectives behind policies still relevant?

- Are the targets being achieved?

Document Structure and Implementation

We need to consider the following:

- How and who are going to monitor the indicators.
- Who will be responsible for putting together the AMR?
- Who will collect the data? Presume each authority will collect data for their authority?
- Do all four authorities monitor indicators and then produce one Black Country AMR?

The framework itself is divided into the themes of the Core Strategy and the Sustainability Objectives covered by the Core Policies. The table is then subdivided to each core policy and lists the policy areas covered in each Core Policy, the proposed indicators, and any targets applicable.

There are also columns to highlight the existing/forthcoming indicators that are currently in place;

National Indicators (NI) – taken from the National Outcome and Indicator Set,
Core Outcome Indicators (COI) - set centrally for Annual Monitoring Reports to monitor (these are currently out to consultation)

SA Framework – these indicators are listed in the Sustainability Appraisal, as this document is a work in progress, these indicators may change

Local Indicators (LI) – these are indicators set locally and are monitored in the AMR.

Contextual Indicators (CI) – Provide a backdrop against which to consider the effects of policies.

Regional Returns –

Residential Land Aggregate Return (RLAR) – Monitors Housing development

Regional Employment Land Survey (RELS) – Monitors Employment development on sites of 0.4ha and above

Leisure and Hotel Development Monitoring Schedules (LHDMS) – Monitors Leisure and Hotel Development of 1000m² and above.

The last column highlights the source of the information.

We would welcome any comments on the indicators listed and any that you may think are missing / appropriate.

6. Directions of Change

Direction of Change 1: Sustainable Communities

The Joint Core Strategy will seek to create cohesive, healthy and prosperous communities, with equal access to a mix of affordable and aspirational housing, and a range of community services and facilities, including lifelong learning, healthcare and sport.

This direction of change relates particularly to the following spatial objectives:

- Model sustainable communities in regeneration corridors
- Enhancing the character of the Black Country's existing housing areas
- A network of vibrant and attractive local / district centres
- Accessible community services and facilities

Core Policy Areas:

- Delivering sustainable housing growth
- Tackle areas of low demand
- Provide a well balanced range and choice of housing
- Deliver affordable housing
- Promote the sustainable location of community and sporting facilities
- To provide a network of sustainable district and local centres
- To meet local shopping and service needs
- To provide accessible transport networks and establish sustainable accessibility standards

Core Policy Areas

Core Policy Area 5 - Delivering Sustainable Housing Growth

The Core Strategy will provide sufficient land to meet at least the minimum regional requirement of 61,200 net new homes during the period 2006 – 2026 (WMRSS Phase 2 Revision). This will involve the allocation of a phased and rolling programme of land for new housing development within the regeneration corridors, appropriate free-standing employment areas, and within the four strategic centres to meet our growth aspirations. We will also identify appropriate levels of residential intensification and redevelopment within housing renewal areas. We will aim to build at least 95% of new housing (gross) on previously developed land.

We will have a core policy that sets out the main sources of housing land supply to meet this Regional requirement.

The West Midlands Regional Spatial Strategy Phase 2 Revision was submitted to the Secretary of State on the 21st December 2007. The Regional Planning Partnership subsequently received a letter from Baroness Andrews setting out concerns that the draft Phase 2 revision does not make provision for the level of homes anticipated to be required by the 2004 based household projections. The Government Office for the West Midlands is to undertake further work looking at options that could deliver higher housing numbers.

It is not the intention of this work to fundamentally question the Spatial Strategy, but to try to identify alternative approaches to achieving this Strategy whilst maintaining as many of the principles as possible.

With this in mind the Black Country Core Strategy has identified sufficient land to meet the Black Country minimum target of 61,200 and has the potential to provide between 1000-1500 dwellings over the minimum. In addition, it has been assumed that the larger areas of surplus employment land (over 5ha) will take some time to come forward for development, the consequence of which is that some capacity will not be realised until after 2026 – beyond the time period of the plan.

Therefore, we believe that we have some flexibility to bring forward some of this additional capacity before 2026. However, realising this additional capacity will be dependent on the ability to undertake land assembly through Compulsory Purchase Orders, relocations etc and the level of assistance we can expect from other organisations and partners, including the Government.

The 4 Black Country Local Authorities have also submitted a bid for Growth Point Status to the Department of Communities and Local Government. Delivery of this additional growth will involve a 28% increase in current annual house building rate to be achieved from now to 2016 (from 2,860pa to 3,640pa).

The Black Country land supply is as follows:

Table 1: Black Country Net Housing Requirement 2007-26

	Dudley	Sandwell	Walsall	Wolverhampton	Black Country
RSS Phase 2 Requirement 2006 – 2026 (net) Minima	-	-	-	-	61200
Net Completions and Conversions 2006/2007 (net)	760	1126	672	300	2858
Sites under construction as of April 2007	518	1208	900	623	3249
Sites with Planning Permission as of April 2007	2184	4118	3933	4492	14727
UDP / Adopted Development Plan Document	1873	1265	1308	1113	5559

	Dudley	Sandwell	Walsall	Wolverhampton	Black Country
Allocations as of April 2007					
Reduction to allow for non-implementation of commitments*	-368 (10% on all)	-538 (10% on all)	-1310 (25% on all)	-672 (10% on pp; 20% on UDP)	-2888
Total completed / committed capacity	4967	7179	5503	5856	23,505
Remaining net housing requirement	-	-	-	-	37,695

* *Varies by source and by authority*

* It is accepted that a certain proportion of the housing capacity will not be realised before 2026. Therefore these figures have been constrained by 15%.

There may also be a small amount of additional windfall capacity to be found outside the regeneration corridors, strategic centres and housing renewal areas. This capacity could be in the form of the redevelopment of obsolete pubs, clinics, schools or small non-conforming employment uses subject to policy and sustainability considerations. It is anticipated that the contribution from this source will be small and will not be included within the overall identified capacity.

Table 2: Preferred Spatial Strategy - Housing Capacity (2007-26) by Phase

	2007-16	2016-26	2007-26
SOURCE OF CAPACITY			
Regeneration Corridors			
RC 2	450	930	1380
RC 3	325	650	975
RC 4*	600	4000	4600
RC 6	400	2150	2550
RC 7	120	680	800
RC 8	2890	3180	6070
RC 9	2850	3300	6150
RC 10	150	585	735
RC 11	2045	3080	5125
RC 12 (inc. West Bromwich Centre)	1400	2270	3670
RC 13	2485	4315	6800
RC 14	100	400	500
RC 15	100	540	640
RC 16	830	1705	2535
Regeneration Corridor Total (constrained by 15%)	12535	23615	36150
Free-Standing Employment Sites			

Free-Standing Employment Sites Total (constrained by 15%)	1395	1395	2790
Strategic Centres			
SC1: Wolverhampton City Centre	400	2000	2400
SC2: Walsall Town Centre	75	425	500
SC3: Brierley Hill Town Centre	1500	1500	3000
Strategic Centre Total	1975	3925	5900
Housing Demolition Sites			
Estimated Housing Demolitions (2006-26) ¹	-11425	-14375	-25800
Estimated Capacity of Demolition Sites (2006-26) ¹	7725	11915	19640
Estimated net change on Housing Demolition Sites (2006-26)¹	-3700	-2460	-6160
Total Net Capacity			
	12205	26475	38680

* Option 1 for RC4 and Option A for Wolverhampton free-standing employment sites

¹ Taken from WM Regional Housing Land & Urban Capacity Study Refresh 2006

Table 2: Preferred Spatial Strategy - Housing Capacity (2007-26) by Authority

Source	Dudley	Sandwell	Walsall	Wolves	Total
RC 2				1380	1380
RC 3				975	975
RC 4*				4600	4600
RC 6			2550		2550
RC 7			800		800
RC 8		5150	920		6070
RC 9		6150			6150
RC 10	735				735
RC 11	5125				5125
RC 12 ^a		3670			3670
RC 13	2020	4770			6790
RC 14	500				500
RC 15			640		640
RC 16	1645	890			2535
Regeneration Corridor Total (constrained by 15%)	8520	17540	4180	5910	36150
Free-Standing Employment Sites Total (constrained by 15%)	230	765	1530	265	2790
Strategic Centres	3000	0^a	500	2400	5900
Estimated net	50	-4635	-1200	-375	-6160

change on Housing Demolition Sites (2006-26)¹					
Total net capacity	11800	13670	5010	8200	38680
Total completed / committed capacity	4967	7179	5503	5856	23,505
Net Completions (2006-26)	16767	20849	10513	14056	62185
Estimated Gross Completions (2006-26)	22640	33715	14515	17115	87985

* Option 1 for RC4 and Option A for Wolverhampton free-standing employment sites

^a West Bromwich Strategic Centre included within RC12

¹ Taken from WM Regional Housing Land & Urban Capacity Study Refresh 2006

The policy area states that we will aim to achieve a minimum of 95% of new housing development on previously developed land. The target has been set at 95%, rather than 100%, as there are some outstanding permissions and allocations on greenfield land which are likely to come forward within the plan period. In addition, there may be opportunities to pursue land exchanges on some open spaces in line with the PPG17 Open Space Audits and Needs Assessments and the Green Infrastructure Strategy. This could account for 0-5% of completions. The target of 95% is in line with national targets and above the adopted RSS targets for the Black Country.

Policy Options Considered but Rejected

The housing capacity targets are those currently being proposed through RSS Phase 2. Policies to identify housing targets for greenfield land or within the green belt have been rejected because the overall strategy, as set out within RSS Phase 1, includes sufficient flexibility within the regeneration corridors and strategic centres to meet Growth Point aspirations in the most sustainable way.

The inclusion of a specific allowance for windfall development as part of the housing land supply was considered but rejected, as such an approach is not in line with national guidance. Although windfalls made up a large proportion of housing land supply in the past, the JCS signals a new, proactive approach to allocating employment land for housing which is likely to alter windfall patterns in the future. Windfall trends will be monitored in future years to determine whether this position should be reviewed.

Sustainability Appraisal

Obvious key concerns relate to flooding in the regeneration corridors and design of the houses/built development and public realm. Spatial considerations are also relevant in terms of amount of greenspace to be provided and conversely amount of greenspace to be lost or not replaced. These issues are being addressed through core policy area 18. Also transport considerations are vital since so many people travel by car. The concept

of redeveloping existing uses such as pubs, clinics, schools and small nonconforming employment use should bear in mind prevailing importance as a service function before conversion to housing. Regeneration of such uses may be an option in those cases where the service in question has fallen out of use or requires 'updating'.

These issues are being addressed within other policies and also within the work being undertaken within the regeneration corridors.

Re-use of land (95% ambition) is important and should carefully consider the re-use of brownfield land from a heritage and ecology perspective.

Sustainable housing growth must consider logistical issues associated with the existing highway network and seek to maximise location of housing within existing efficient and reliable public transport routes.

Core Policy Area 6 – Tackle Areas of Low Demand

There will be a major programme of housing renewal and an improvement in the quality of homes and residential environments across the Black Country. The areas most in need of regeneration are the Housing Market Intervention Areas shown on the key diagram. Within these areas, the first phase of housing renewal activity will take place within the Housing Renewal Hubs shown on the key diagram.

We think we need a Core Policy to facilitate this programme. The policy will strike a balance between refurbishment versus redevelopment and will provide further detail on the broad locations and delivery mechanisms associated with these initiatives.

A core policy that promotes the renovation and improvement of the Black Country's existing housing stock and the surrounding residential environment will help to create sustainable communities. There will be a combination of refurbishment and renewal, to be determined on a site by site basis having regard to the most sustainable approach.

This Core Policy Area will be delivered mainly by the existing HMRA, Urban Living and the Evolve HMIA. There are also mechanisms in place for areas such as the ABCD (New Deal for Communities) area in Wolverhampton, Greets Green NDfC and various PFI projects across the Black Country.

[Reinsert text with options](#)

Question – what criteria do you think we should use to determine the balance between renewal and refurbishment

Consultation Responses from Issues and Options Paper

The majority of the respondents agree with the extent and location of the HMRAs shown in the issues and Options Report. However, they would also like to see smaller, more localised areas considered.

In addition, there is concern that some areas may suffer from blight. Therefore, the JCS must make its intentions clear from the start to avoid this.

An emphasis on refurbishment and regeneration rather than redevelopment is also suggested.

Policy Options Considered but Rejected

No policy options have been rejected.

Sustainability Appraisal

The existing housing stock is responsible for one of the single highest sources of carbon emissions in the Black Country. The key sustainability issues relate to the design of housing (addressing and reversing existing adverse effects associated with the housing stock) in terms of climate change effects, water efficiency, design of the public realm, greenspace, accessibility to services and transport infrastructure (opportunities for walking and cycling as well as safe and reliable public transport). Core Policy Area 15 will also address this issue. Any remaining issues will be addressed in the Submission Core Strategy.

Core Policy Area 7 – Provide a well balanced range and choice of Housing

The Core Strategy will provide for a range and choice of good quality homes across the Black Country. This approach is essential to meet the needs of existing residents, attract and retain professional, entrepreneurial and managerial households, meet the needs of Black and Minority Ethnic communities, gypsies and travellers and people with particular special needs. Developments will be assessed according to how well the proposals meet the identified needs within development areas, such as the regeneration corridors, the strategic centres and the edge of the conurbation.

We think we need a core policy that provides a range and choice of housing to meet identified needs and the transformational aspirations of the Black Country..

With regard to the likely profile of household types requiring market housing, research carried by Ecotec Research and Consulting (2007) indicates that the types of new households likely to form by 2026 across the Black Country are:

One person accommodation	= 14 – 18%
Two person accommodation	= 40 – 45%
Three+ person accommodation	= 40 – 42%

However, to increase professional, entrepreneurial and managerial households to national levels by 2031, more new housing must be provided for such households currently leaving the Black Country (mostly families needing larger, detached homes) and for those that are currently moving in (more likely to be young, single people working in Birmingham). The Housing Market Assessment will bring together all available information, define local housing market areas and provide the necessary cross-boundary perspective to finalise these figures for submission stage.

The requirement for gypsy and traveller accommodation will be set out in the Core Strategy. At present the only indication we have of the number of pitches required across the Black Country are the figures contained within the WMRSS Interim Regional Statement. This indicates that the Black Country requires 40 pitches 2006-2011 with an annual growth of 2-3% between 2011-2026. The Black Country also requires 44-59 plots for Travelling Showpeople within the same period.

The four Black Country authorities have recently commissioned a Gypsy and Traveller Accommodation Assessment that is due to be completed early in 2008. It is anticipated that these figures will update the Regional Statement.

Consultation Responses from Issues and Options Paper

With regard to the needs of professional, entrepreneurial and managerial households, a number of locations have been suggested and will be taken into account. Apart from specific locations, broad areas have been suggested such as around the edge of the BC, within the regeneration corridors, within higher quality environments and along passenger rail lines and canal corridors. There was also a suggestion to extend existing areas attractive to such groups.

Policy Options Considered but Rejected

No policy options have been rejected.

Sustainability Appraisal

The key aspect of this policy in environmental sustainability terms is the design and location of housing. Housing design can be specified in accordance with the code for sustainable homes and a minimum of Level 3 is recommended, with aspirations for a range of housing such that code level 4-6 can be incorporated. Core Policy Area 18 will also address this issue. Mitigation against and adaptation for climate change are both affected by new housing proposals and issues in relation to adaptation against storm events, avoiding the exacerbation of run-off and coping with hot summers is all relevant.

Design also applies to the environment within which the housing might be located, particularly the contribution to the public realm features and making the most of existing built and archaeological heritage. Location in terms of transportation, services and employment land is also relevant if a positive encouragement of walking and cycling is to be achieved. This policy should also carefully consider the findings and aspirations of the SCSs for each authority; social inclusion should be an aspiration of this policy and recognized accordingly with quantitative targets.

Clearly the Housing Market and other Assessments will provide important information to assist with providing clarity to this policy option.

It is anticipated that these issues will be addressed within the Submission Document of the Core Strategy.

Core Policy Area 8 – Deliver Affordable Housing

The Core Strategy will seek to provide sufficient affordable housing to meet local housing needs. The level of need will be based on up-to-date assessments of need and other housing market area information. Rising house prices, combined with the

shrinking supply of social housing and targets for affordable housing on new developments not always being met, means that there is a significant need for affordable housing even in the most affordable areas of the Black Country.

This core policy will provide an opportunity for the 4 Black Country authorities to establish an agreed definition and to consider whether higher or lower proportions of affordable housing should be sought in particular areas of the Black Country, for example, within the strategic centres, regeneration corridors and existing housing areas. The policy will also set out how affordable housing will be delivered.

The following information has been extracted from the 4 Local Authorities' Housing Needs Surveys. It shows that the affordable housing requirements differ across the Black Country.

Existing and Recommended Affordable Housing Requirements

Local Authority (date of Housing Needs Survey)	Annual Unmet need for new affordable housing	Existing % of affordable housing on qualifying S106 sites	Recommended % of affordable housing on qualifying S106 sites	Recommended tenure of new affordable units	Recommended site threshold for S106 negotiations	Estimated subsidy required per dwelling for development of 100 flats valued at £120K
Wolverhampton (2007)	702 p/a	25%	40%	70% rent/ 30% intermediate	15 units/ 0.5ha	£24,500
Sandwell (2007)	871 p/a	25%	40%	50% rent/ 50% intermediate	15 units/ 0.5 ha	£21,600
Walsall (2005 updated 2007)	305 p/a	25%*	25%	90% rent/ 10% intermediate	15 units/0.5 ha	£17,280
Dudley (2005)	549 p/a	30%	35%	50 rent/ 50% intermediate	15 units/0.5 ha	£18,400

* In updating Walsall's Housing Needs Survey, their consultants (Fordhams) advised that a target greater than 25% is justified but did not specify what the target should be.

From the Table above, it can be seen that the annual unmet need for new affordable housing is 2427 affordable units in the Black Country. With information available from Housing Needs Surveys and Housing Market Area Assessments, there are a number of options for achieving affordable housing. These options are as follows:

1. Individual Local Authority targets based on the recommendations in the latest Housing Needs Surveys

Advantages

The need for affordable housing will be met where it arises
Likely to achieve political approval

Disadvantages

Developers will prefer to build in areas with the lowest requirement
Areas with higher percentages will encounter more problems with viability

2. Work towards achieving the target set out in the West Midlands Regional Spatial Strategy Phase 2 Revision Preferred Options Document, currently 26%

Advantages

The figure is achievable and won't affect site viability

Disadvantages

This figure will not meet the required need in the Black Country

3. A common % across the Black Country based on an average of the 4 LAs' need

Advantages

Keeps a level playing field between all 4 boroughs – developers won't find one borough a more attractive place to develop than another

Disadvantages

It will not reflect the level of need in each local authority

Problems with viability will increase in those Boroughs where the percentage should have been lower than the average

4. Locally specific approach to affordable housing targets which identifies different targets for particular locations.

Advantages

Directly related to local need

Disadvantages

Problems with viability, particularly in those areas associated with high development costs or uncertain market conditions.

Question – which option do you think is the most appropriate?

Consultation Responses from Issues and Options Paper

The majority of respondents feel that different levels of affordable housing provision will be required in particular areas of the Black Country, such as creating more mixed communities by increasing levels in areas where current levels are low. Affordable housing should not be clustered in particular locations and should be provided in areas of need so as not to create ghettos.

Some people feel that the viability of provision will be an issue on contaminated/difficult brownfield sites.

Most respondents feel that affordable housing should be provided in areas of greatest need, close to jobs and services. There is also a view that the Core Strategy needs to be flexible and shouldn't set different levels of affordable housing provision in particular areas as this should be calculated on a site-by-site basis dependent on viability.

Policy Options Considered but Rejected

No policy options have been rejected.

Sustainability Appraisal

Again the design of the new housing is important in terms of sustainability considerations. The Code for Sustainable homes provides a range of housing specifications. It is desirable to see a commitment to at least level three and or (ideally) above e.g. level four. This leads to challenges given the fact that the cost of building the houses may prove inhibitive. Core Policy Area 15 will also address this issue.

In relation to social considerations, any affordable housing policy should seriously take account of the recommendation to be found in Sustainable Community Strategies (SCS). A commitment to provide the right level of housing, based on need, will be beneficial in sustainability terms.

Core Policy Area 9 – Promote the sustainable location of community and sports facilities and protect existing facilities

Community and sporting facilities (including health and education) will be developed and protected where appropriate as essential components in promoting and supporting sustainable communities within the Black Country. The Core Strategy will ensure, where possible, the clustering of complementary facilities so as to minimise the need to travel and provide a range of transport modes including footways, cycle paths and public transport in the development of such facilities.

In particular, the Core policy will:

- Set out an approach which identifies the appropriate scale and nature of community facilities so as to secure and maintain the sustainability of the settlement, place or community in which they are located;
- Ensure that such facilities are safely accessible to all through a range of transportation modes and can be safely used to increase and secure their viability
- Define a hierarchy and establish standards for sub-regional level sports facilities and establish the “neighbour shares” principle;
- Define Sports Beacons – specific locations for some, areas of search or criteria for others to be guided by the emerging Black Country Sports Facilities Study;
- Establish a comprehensive Black Country sports facility network in conjunction with the Building Schools for the Future programme.

‘Sustainable locations’ are those where the impact of such facilities on transportation and natural resources is minimised and the use of renewable energy sources and technologies is maximised. In addition the development of community and sports facilities will make a positive contribution to the provision of a green infrastructure network including bringing benefits to biodiversity and helping to deliver high quality parks and open spaces.

The Policy area will also include the protection of existing community facilities, particularly where they provide vital service, identity and function to communities e.g. community centres, schools, colleges, nurseries, places of worship, health facilities, care homes and libraries unless it can be demonstrated these are no longer viable. Similarly, key services such as pharmacies, post offices, public houses and local convenience shops will be protected where possible unless it can be demonstrated these are no longer viable or alternatives exist.

This Core Policy Area will be delivered mainly through the four Local Authorities and their Local Strategic Partnerships in partnership with the Black Country Consortium, local Primary Care Trusts, health and education authorities, the Sports Council and the private sector.

Consultation responses from Issues and Options Paper

The need to identify a hierarchy of community and sporting facilities which will need to be provided in Strategic Centres down to District and local centres as well as other sustainable locations was identified. This would range from regionally and sub-regionally

significant provision down to the provision of community and sports facilities at the very local level. The need to provide a joined up approach to the provision of community, social and sports facilities is recognised as a way of providing a wide range of facilities for all sectors of the community avoiding duplication and providing a sustainable network of such facilities.

New Education facilities should be located in sustainable locations but also near to the new communities which they will serve within the Regeneration Corridors. Schools were seen as a way of providing community, leisure and sporting facilities for the local community when not in school use.

Cultural, leisure and tourism facilities that are likely to attract large numbers of visitors should in the first instance be clustered within town centres and should have good accessibility to the public transport network. Locally important cultural facilities should be protected and enhanced where they contribute to wider regeneration.

Facilities need to be accessed by walking and cycling as much as other modes of transport. Creation of a green infrastructure and network of parks and open spaces within the Black Country through the “Urban Park” concept could and should enable walking and cycling to become the norm.

There was much support for community sports and recreational facilities including a hierarchy of community sports provision such as community halls, satellite centres (e.g. secondary schools), hubs (e.g. multi sports villages), Black Country level facilities (e.g. 12 court sports halls), Regional facilities (e.g. University of Wolverhampton EIS Judo Centre) and National facilities. Also more water sports, indoor skiing, indoor rock climbing and cycle sports. Sport England’s Active Places’ Power should be referenced and acknowledged.

Policy Options Considered but Rejected

No policy options have been rejected. There may be options relating to proportion of green infrastructure within each Regeneration Corridor.

Sustainability Appraisal

The Policy is regarded as sound covering environmental, social and economic issues. There may be opportunities to introduce targets and numbers in terms of catchment size for facilities, their likely use and the availability of use to different communities.

Core Policy Area 10 – To provide a network of smaller District Centres and Local Centres – [does this duplicate CP 27? 28 and CP 30?](#)

We think a core policy is needed to identify the smaller District and Local centres, to define the roles of these centres and guide development, and to provide a basis for the designation of new district or local centres where necessary.

As shown in the Hierarchy of Centres table on page ??, a large number of locations across the Black Country are designated as small 'district'¹ or as 'local' centres. The main functions of these centres are to meet the day-to-day convenience shopping and local service needs of their local areas. They often have a special importance for certain sections of the community, such as elderly people or (as at Caldmore in Walsall and Dudley Road in Wolverhampton) for ethnic minorities, for example, Smethwick High Street.

Generally new developments should be in scale with the centres and catchments concerned. Thus, proposals for convenience shopping should be smaller than those in the non-strategic town centres, so in the small district centres developments might not exceed 1,000 sq.m. gross, whilst in the local centres it might not generally be appropriate for them to exceed 400 sq.m. gross. In addition, modest developments for comparison shopping, offices or leisure uses of less than 200 sq.m. gross², might be considered appropriate in these smaller centres.

However, we would like your views. Is there justification for distinguishing between the district and local centres in this way?

There is also a need for the smaller centres to be flexible to respond to particular circumstances such as a defined local need or a special local role or opportunity. Therefore the core policy should allow that developments above any thresholds or which would be on the edge of, rather than within, one of these centres may be allowed if a number of criteria are met, particularly with regard to a particular need that cannot be met within the threshold or boundary of the centre or within a larger centre and there would not be an adverse impact on any larger centre and the proposed development would be accessible by a choice of means of transport from the catchment area it is intended to serve.

It is also considered that, when the scale and pattern of proposed housing growth has been established following this consultation, the policy should provide for additional district and / or local centres to be designated or developed where existing deficiencies and /or new housing development would lead to the above criteria being met. Conversely, due to recent changes in shopping patterns it may be necessary to review the designations of some of the present district and local centres.

Consultation Responses from Issues and Options Paper

Whilst the majority of representations were concerned with either the roles or the regeneration needs of larger centres, a significant number of representations referred to local centres. Several referred to particular needs for regeneration or improvement. Others expressed the view that local centres (and local shops) would be of increasing importance in meeting needs as locally as possible, increasing sustainability and serving an increasingly elderly population.

¹ The non-strategic town centres in Walsall (Aldridge, Bloxwich, Brownhills, Darlaston and Willenhall) are designated as 'district centres in Walsall's UDP although the plan does make clear they can be considered as town centres in terms of national planning policy and these have been considered as small town centres under the previous heading..

² This is the amount of floorspace that Government policy on retail development in PPS6 considers should not be subject to the sequential approach when extensions are proposed.

A few representations put forward proposal for new local centres, either to support housing growth or to make up for a perceived lack of local facilities.

Policy Options Considered but Rejected

No policy options have been rejected.

Sustainability Appraisal

To be completed

Core Policy Area 11 – To Meet Local Shopping and Service Needs*

The Black Country authorities' approach is to encourage existing centres to meet as many of residents', workers and visitors needs as possible. However, we believe it is necessary to have a core policy that recognises there will be some areas that either cannot be served from existing centres, where existing shops and facilities need to be protected or where it will be most appropriate to make use of existing buildings and opportunities.

In our view the policy will need to acknowledge the role of existing local shopping, service, leisure community and other facilities. These should continue to meet the day-to-day needs of communities, workers and visitors in their immediate localities unless it can be demonstrated these are no longer viable. In doing this the local authorities will be likely to want to take account of the significance of particular facilities (such as pharmacies and post offices and may seek to restrict change of use.

Elsewhere it is considered there is likely to be a need to provide for more / improved local facilities – for convenience shopping, local services, eating and drinking places, and health, community and local education facilities – to meet existing deficiencies, to serve housing growth or to make the best use of existing premises and /or combine uses. This should be the subject of strict criteria, including that there should be a clearly-defined local need, that the need is to be met at an appropriate scale, it could not be served by investment in a nearby centre, there would not be an adverse impact on any centre and access to facilities would be improved. The aim will be to complement the regeneration strategy for centres, rather than to allow any loopholes for out-of centre development (which would need to be carefully assessed against tests derived from Government policy).

Consultation Responses from Issues and Options Paper

Whilst most of the representations were concerned with issues relating to centres, several sought support for local 'corner' shops. They made the point that (like local centres) local shops are likely to be increasingly important in seeking to meet local needs locally and serving an elderly population. Some representations referred to the need to protect existing valued facilities.

Although the representations that proposed new local shopping tended to express proposals in terms of new centres, it is possible to infer the view that if the need were

simply for a new corner shop then that is what should be provided. There were references to the general need to plan for additional 'top-up' shopping where necessary and for local community facilities.

Policy Options Considered but Rejected

No policy options have been rejected.

Sustainability Appraisal

To be completed

Core Policy Area 12 – To provide Accessible Transport Networks and establish Sustainable Accessibility Standards.

Increases in the number of households and economic activity will increase transport demand. In order to mitigate this the quality of public transport networks, the location of development and measures to ensure accessibility by means other than the private car will be important. The framework by which public transport will serve our communities and will link them to key services, facilities and opportunities needs to be put in place. It will also establish common standards for the accessibility of new developments by more sustainable means than single occupancy car trips. This framework will include:

- The criteria and process by which key services and facilities will be deemed accessible or not to local communities
- The means by which integration between modes and between local and strategic networks will be improved to increase local community's ability to access key services, facilities and opportunities
- The requirements of transport services for all members of our communities, including the mobility impaired.
- Establishing common standards for the safe accessing new developments by public transport, cycling and walking, including for wheelchair users
- Defining the conditions when travel plans and transport assessments will be needed for new developments and what they should encompass
- Investigating the suitability of establishing mechanisms to tie developers into delivering Travel Plans, with penalties for not doing so.

We think we need a core policy to deliver this framework.

This policy area needs to be clarified – what questions are we asking – do we have standards or criteria to put forward?

Consultation responses from Issues and Options Paper

The Black Country was identified as having generally good levels of access to its communities and key facilities, compared to some parts of the country. However, a large number of representations made reference to their communities having poor public transport linkages, particularly during evenings and at the weekend. This was supported by representations identifying the need for good quality 'integrated' public

transport serving our communities as being important to tackling the social exclusion agenda.

Various responses also identified that good levels of accessibility is not just a transport issue, but needs to be linked to the locality of development. Support was given to the emphasis of development in centres and Key Corridors well served by public transport.

The importance of transport systems being able to serve all members of our communities was also identified within the responses, including the needs of disabled people. Specific representations were made to the need to ensure that new developments are adequately served by a variety of transport modes, including the more sustainable modes such as cycling, walking and public transport. This was also emphasised by representations suggesting that the Core Strategy needs to outline how developer contributions would be secured and sustained towards appropriate transport improvement needs

Policy Options Considered but Rejected

No policy options have been rejected

Sustainability Appraisal

The policy should help to reduce the need to travel, carbon emissions and to improve air quality. Monitoring and targets should be set to assess progress in these areas. Transportation in all its forms can have positive and negative effects on the public realm. Public transport must be safe to use and location of routes and design of interchange facilities is important. Reduced car use and the provision of high quality efficient reliable and safe public transport could have economic benefits.

Core Policy 13 – Cycling and Walking Networks

In order to encourage growth in cycling and walking it is necessary to define the location and criteria for safe cycling and walking networks and facilities that serve our communities and link them to key services, facilities and opportunities. The framework for action will include :

- Identify walking and cycling networks, including Right of Way Improvement Plans (RoWIPs)
- Establish the criteria for common designs for cycling and walking networks across the Black Country
- Determine which areas and facilities will need strong cycling and walking links, including the links to other key transport hubs, nodes and corridors
- Support the development of cycling and walking facilities as part of new developments

We think that a policy is needed to help deliver these actions.

This policy area needs to be clarified – what questions are we asking – do we have standards or criteria to put forward?

Consultation responses from Issues and Options Paper

A large number of respondents identified the importance of cycling and walking in particular in supporting an efficient and effective transport network. Particular importance was placed on high quality cycling and walking supporting access into our centres and key transport hubs.

References were also made to the need for effective and consistent networks for walking and cycling, in addition to on-road routes the use of 'greenways', rights of way and canal towpaths. However, there was a reference to protecting highway capacity on key routes to industrial areas for commercial traffic and trying to deter conflicts between commuter cyclists travelling fast on off-road leisure routes.

Policy Options Considered but Rejected

No policy options have been rejected

Sustainability Appraisal

Encouraging cycling and walking for all or part of a journey is important. Promoting safe cycling and walking can contribute to healthier lifestyles. Provision for walking and cycling needs to be built into the networks when highways are developed. Green infrastructure can be designed to promote access informally as well as incorporating formal walking and cycling routes. Quality of route and awareness both influence usage.

Direction of Change 2: Environmental Transformation

The delivery of high quality, liveable and distinctive places, which respect and make the most of the existing diversity of the Black Country's natural and built environment, particularly its canals and open spaces, and industrial and architectural heritage.

This direction of change relates particularly to the following spatial objectives:

- Model sustainable communities in the housing led corridors
- Enhancing the character of the Black Country's existing housing areas
- A high quality environment
- Providing sufficient waste recycling and waste management facilities in locations which are the most accessible and have the least environmental impact

Core Policy Areas:

- Providing high quality design in all new development
- Protecting and enhancing Local Character and Distinctiveness
- The Density of New Development
- Delivering Environmental Transformation
- Delivering Sustainable and Energy Efficient Construction
- Safeguard the Black Country Minerals Resources
- Provide a continued supply of Aggregate Minerals in the Black Country
- Provide a Supply of Clay to brickworks
- Providing a supply of energy minerals
- Natural building stone
- Promoting the Prudent Use of Mineral Resources

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Core Policy Areas

Core Policy Area 15 – Ensuring High Quality Design in all New Development

Good design is a key element in the successful regeneration of the Black Country. We will support the delivery of vibrant, welcoming and interesting places and spaces that are safe and well connected.

The core policy will ensure that high quality design is a fundamental requirement for all aspects of the built environment and open spaces. Architecturally varied designs which support local character and identity will be encouraged.

The policy area will require new development to relate positively to the street and the public realm, consider the ease with which the public are able to move through and around the development and the nature and height of any buildings and their effect on the surrounding urban area. The innovative use of greenspace and the natural environment will also be encouraged. The 4 local authorities will reject poor design, particularly those designs that are inappropriate, or clearly out of scale with their surroundings. This policy will also be linked to Core Policy Areas 18 and 19 that deal with sustainable construction and energy efficiency.

Consultation Responses from Issues and Options Paper

Some of the responses suggested that there should be a stronger emphasis on the quality of the built environment. A reference to the “Building for Life” benchmark is suggested.

Policy Options Considered but Rejected

We believe that there is only one policy option. It is considered that high quality design should be a requirement for every new development.

Sustainability Appraisal

This is a new policy area that has not been subject to the SA assessment. However, a number of comments made to the density policy are relevant in this case. Namely, design should not only refer to the specification of actual buildings in terms of energy efficiency and materials, but to the immediate public realm that is part of the development proposals. Minimum standards for proportion of green space (that fits with green infrastructure intentions) should be set. This can lead to health, biodiversity and built heritage benefits; the aesthetic built design of all new developments should be based on existing character information and seek to maximise opportunities for enhancement of particular built features. English Heritage’s ‘Streets for All’ document is an example of a useful publication in this respect. Ideally some form of public consultation and engagement could be useful when considering design of the immediate public realm. These issues will be dealt with prior to the Submission document.

Core Policy Area 16 – Protecting and Enhancing Local Character and Distinctiveness

The Core Strategy will protect and enhance local character and distinctiveness. The overarching aim of these would be to assist in maintaining the individual identity of the Black Country as a whole as well as that of its' complex mosaic of distinct and diverse communities.

The work being carried out in the Black Country Historic Landscape Characterisation (HLC) will assist in providing a context for these policies at a broad level of detail through identifying specific character areas. Further more detailed HLC at a localised level will also be required as appropriate in order to fully inform specific land use proposals eg in respect of major individual developments or Area Action Plans.

Through the use of such methods it will be possible to identify a network of historic centres, including traditional market towns such as Willenhall, Wednesbury, Halesowen and Bilston, and other locally distinctive areas that contribute positively to the Black Country's character and/or offer opportunities for enhancement. Policies will protect these by seeking the retention and refurbishment of existing buildings of character and encouraging heritage led regeneration. This would go hand in hand with promoting new build redevelopment that is locally responsive and that safeguards, consolidates and wherever possible enhances local character and distinctiveness.

Some major historic sites could be viewed as "legacy locations", for instance areas alongside and adjacent to the canal network. There may be potential for high density housing in the canal corridors including the retention, refurbishment and re-use of existing historic buildings in order to reinforce canalside character. The Foster and Rastrick Iron Works at Stourbridge, and Chances Glassworks and the Soho Foundry in Sandwell provide examples of sites which could be regenerated in this way with the assistance of appropriate policies.

In addition we will identify specific housing areas of a defined and cohesive character such as distinctive historic suburbs and out of town centre housing areas that may lie outside the regeneration corridors. These can vary from Victorian terraced streets to urban fringe areas of substantial Victorian or Edwardian houses with large gardens. Policies that seek to secure the established character and integrity of such areas could have the effect of making them generally more attractive as places to live.

Consultation Responses from Issues and Options Paper

There was general support for this subject and several suggestions put forward on which areas should be preserved and enhanced. These will need to be looked at in connection with the Historic Landscape Characterisation work referred to above.

Policy Options Considered but Rejected

No policy options have been rejected.

Sustainability Appraisal

There is potential to acknowledge the importance of the wider heritage resource, including non-designated sites and features in areas which may not be of obvious importance for the historic environment in the sub-region. This is significant as a large

proportion of the Black Country's cultural heritage resource is non-designated, in areas of unprotected poor townscape quality, and is at risk. This will be addressed in the Submission Core Strategy.

Core Policy Area 17 – The Density of New Development

The Core Strategy will ensure appropriate densities for new development. Achieving an appropriate density for new developments is crucial to its success or failure within its urban context. Higher density development work best where they are located close to local facilities and public transport connections. The better served and connected a development is, the stronger the case for achieving higher densities. In addition, the more people living in an area, the more likely it is to be successful as a living environment as it ensures that an area remains lively and well-used. This also helps support local services and builds community identity.

Therefore, in certain sustainable locations, particularly areas adjacent to good public transport links, such as along the Metro line 1 route between Smethwick and Wolverhampton, the Core Strategy will be looking for higher density developments of 60 - 75 dph net (45 dph gross), while in some areas, for example, in the suburbs of the BC around Stourbridge, Tettenhall, Aldridge and Great Barr, there may be a requirement for lower density developments of 40-60 dph net (35 dph gross). However, all developments must achieve a minimum 30dph net unless there are specific areas of important local character, of less than 30 dph, gross where higher densities would prejudice that character and require additional protection.

We think we need core policies to ensure that high quality design is achieved within all new housing developments, particularly in areas where higher densities are required. The acceptable approach to achieving higher density solutions is a design – led approach concentrating on sustainable urban quality. It is anticipated that additional, detailed local guidance will be provided through SPD.

Consultation Responses from Issues and Options Paper

Some of the responses suggested that there should be a stronger emphasis on the quality of the built environment. A reference to the “Building for Life” benchmark is suggested. It is also suggested that existing local authority planning standards need to be reviewed to plan for higher density developments.

Policy Options Considered but Rejected

We believe that there is only one policy option. It is considered that high quality design should be a requirement for every new development. We also consider that the design of high-density development is crucial to achieving the Black Country's challenging housing numbers.

Sustainability Appraisal

This policy refers more to density of development (which is a key aspect of how design might be limited) rather than design itself. Therefore, the policy has been altered to reflect this fact and an overlying policy area setting out our desire to ensure good design in all new development has been added.

Design of housing is vital for climate change mitigation and adaptation. Two key publications are relevant in this respect: PPS1 Climate Change and the Code for Sustainable Homes. CPA15 sets out some targets in relation to the Code for Sustainable Homes. Whilst level three of the code is widely adopted at the moment, it would be advantageous (as suggested by CPA15) to introduce increased levels over time such that level 6 is the norm for all new homes built post 2016. This may include incorporation of level 4 from the point of adoption of the Joint Core Strategy. This issue is being addressed through CPA15 and 15a and will be incorporated within the Submission document.

Core Policy Area 18 – Delivering Environmental Transformation

The Core Strategy will deliver policies setting out how to protect, enhance and expand the network of green infrastructure and the natural, historic and cultural heritage of the Black Country. These will be Black Country wide policies, but with an emphasis on the regeneration corridors, strategic centres and beacons. All development will need to contribute to improving the green infrastructure of the Black Country whilst at the same time respecting the historical character of the area. We will also look to specifically protect wildlife corridors and designated wildlife sites, in particular the two SACs, and developments will be required to improve and extend these.

The way forward will be through the implementation of the Environmental Transformation Plan (formerly the Landscape Action Plan).

A good quality sustainable environment, accessible water areas, green space, excellent sport, leisure and cultural facilities are important in retaining and attracting people and investment to the Black Country. The plan will contain guidance that will promote an improved environment by requiring high standards of design and sustainable construction, protecting and enhancing environmental assets (including landscape, biodiversity and geodiversity) and provide an interconnected network of multi-functional green space. Brownfield and Greenfield spaces can serve many uses, including landscape enhancement, linkages, nature and heritage conservation, water management, recreation, leisure and tourism and provision for healthy lifestyles. In addition this approach will support the Black Country as it meets the challenge of climate change. Green or Environmental Infrastructure is the term used to describe and plan for all of the above, aspects of which have been highlighted in the Black Country Urban Park concept.

The value of the wider environment to the future growth and prosperity of the Black Country has long been recognised. The guidance in the ETP will identify opportunities for linking existing spaces and facilities in a network of multifunctional green space and will connect communities to spaces and people to nature by contributing to improved environmental quality, quality of life and well-being.

The screening outcome of the Habitats Regulations Assessment on the Joint Core Strategy has found that there could be significant effects on the two Special Areas of Conservation (SACs) as a result of policies and regeneration corridors put forward. These effects concern the potential land use changes in the vicinity of the Fens Pool SAC and the likely increase in traffic on the A5, M6 Toll Road and local roads as a result of developments promoted in the Core Strategy and the subsequent effects on water

quality in the Cannock Extension Canal from run off. There will be a policy to protect the Special Areas of Conservation (SACs) and supporting habitat areas. The two SACs will be shown on the key diagram and we will show the main green spaces and nature conservation sites on the corridor plans.

Consultation responses from Issues and Options paper

There was general support for the Urban Park concept and the Landscape Action Plan although there was no overall consensus as to whether the priority should be the regeneration corridors or the landscape corridors and beacons. Those with an interest in biodiversity, geodiversity and wildlife issues favoured the latter while developers and/or their agents favoured the former.

There were a number of comments on the Green Belt although it is considered that there is no need for a specific policy if we are following national guidance and PPG2. Specific comments may be better addressed through subsequent Site Allocations SPDs.

Policy Options Considered but Rejected

We feel that there is only one policy option. The transformation of the environment of the Black Country is vital for its future prosperity and growth and the ETP will set out the scale and type of green infrastructure and other guidance in order to deliver proposals for improvements and to assist in the management of growth and landscape change.

Sustainability Appraisal

This is a crucial policy for the successful delivery of green infrastructure and the benefits that can be brought for health, air quality, landscape, built environment, biodiversity and climate change mitigation and adaptation. The policy will have positive sustainability effects. There is a need for measurable targets and quantified effects of the policy. The Environmental Transformation Plan (ETP) needs to be in place for the policy to say more in terms of spatial and quantified aspects.

The ETP should be the overarching driving force behind this policy and the Appropriate Assessment issues, whilst important, effect parts rather than the whole of the black Country and represent only one aspect of the ETP.

This will be addressed by progressing the ETP to enable it to feed into the submission document of the Core Strategy.

Core Policy Area 19 – Delivering Sustainable and Energy efficient construction*

The Core Strategy will promote the sustainable design and construction of new buildings taking on board best practice guidance set out by Building Research Establishment Environmental Assessment Method (BREEAM) and the National Home Energy Rating (NHER). High energy efficiency ratings must be attained in all new developments incorporating the Building for Life standards and Code for Sustainable Homes levels. This will be done incrementally by stating that all new houses should meet level 4 from the adoption date of the Core Strategy and carbon neutral by 2016. Non-domestic developments will also be set targets on energy efficiency

Every opportunity should be taken by developers to propose higher standards than those set by national and regional targets.

The standards for offices and other non-domestic buildings in the Regional Spatial Strategy is for 10% below the target emission rate of the current Building Regulations by 2016 and for new homes it should be level 4 before 2013. The Black Country Core Strategy is aiming for higher standards of energy efficiency and this will be reflected in the policy.

Almost a third of carbon emissions in the Black Country come from existing buildings and relate to the inefficient design of homes which were built previously. There should be a policy to “retro-fit” these standards in any regeneration scheme.

Consultation responses from Issues and Options paper

The results of the consultation were not conclusive – whilst there were those supporting the setting of minimum standards for new buildings others were concerned that regeneration could be prevented if the Core Strategy set levels that went beyond national guidance and emerging policy.

Policy Options Considered but Rejected

The original policy wording was for a minimum of level 3 now and level 4 by 2010

Sustainability Appraisal

Whilst level 3 of the Code for Sustainable Homes is widely adopted at the moment, it would be advantageous to introduce increased levels over time such that level 6 is the norm for all new homes built post 2016. This may include incorporation of level 4 from the point of adoption of the Joint Core Strategy. This has been incorporated into the Core Strategy.

Core Policy 20 – Renewable Energy

The Core Strategy will require all new development above a certain threshold (commercial schemes of over 1000sq.m floorspace and housing schemes of over 10 dwellings) to incorporate renewable energy production equipment on site to provide at least 10% of predicted energy requirements for the development up to 2010, increasing by 1% from there after up to 20% by 2020. However there may be sites that do not lend themselves to the 10% on-site renewable energy generation due to physical or policy constraints. In these instances a lesser percentage may be acceptable. The onus will be on the developer to demonstrate that a variety of renewable energy sources and generation methods have been assessed and costed; that the achievement of the minimum percentage of energy from on-site renewable sources would make the proposal unviable; and that the need for the development proposal and its contribution to the aims, objectives and other policies of the Plan outweighs the lesser use of on-site renewable energy. The relevant Black Country authority will expect some of the on-going energy use to be from on-site renewable sources and a commuted sum being paid as a contribution towards generating the balance of the minimum percentage required.

According to the West Midlands Regional Energy Strategy, renewable energy sources account for only 1% of the region's total energy consumption. The targets set by the Strategy for renewable energy generation for the region of 5% by 2010 and 10% by 2020 are half those set by central government. The Black Country should be, as a minimum, following the national guidance if it is to play its part in addressing the climate change issue. The four Black Country authorities will lead by example by seeking to maximise energy efficiency and incorporation of renewable energy technologies when refurbishing their existing building portfolio.

There are various sources of renewable and low carbon sources of energy that save carbon emissions which are applicable to the Black Country. These include passive solar energy, solar thermal panels and photovoltaic panels, each with their own cost effectiveness value. Wind power can be either at the micro level, subject to the vagaries of available wind resource, or the large scale turbines and their possible effects on the environment. Ground source heat pumps are becoming a cost effective source of low carbon energy generation while combined heat and power (CHP) plants will be cost effective where they both deliver electricity and find a local use for the waste gas.

Bioenergy can offer opportunities for carbon neutral energy generation in the Black Country. These can include the potential for micro - generation and biomass schemes by using locally sourced supply of waste wood generated by the four authorities' parks departments and private concerns. Each Black Country authority could support a "Tree Station" to provide the necessary sustainable local source of wood chips and pellets. In addition the anaerobic digestion of food and garden waste, the growing of energy crops and the reuse of waste oil can all be used for energy generation. The Black Country's extensive canal system can be utilised for the heating and cooling of buildings and provide on-site facilities for renewable energy.

Consultation responses from Issues and Options paper

Opinion on renewable energy was split between those who thought the Core Strategy should set higher targets and those who wished to avoid being too prescriptive .without there being an overwhelming majority for either approach.

Policy Options Considered but Rejected

No policy options have been rejected.

Sustainability Appraisal

More direct provision should be made for off-site renewable energy provision to make up any shortfall in achieving the balance of the 10% renewable energy required for certain development where this target cannot be achieved (in addition to commuted sums). This could include additional provision and higher percentages of renewable energy in other developments in the sub-region where over 10% renewable energy can be achieved.

The Mineral Safeguarding Areas (MSA) identified in the Dudley and Walsall UDPs are based on existing quarries. However, national policy guidance advises that MSAs should cover the full extent of proven mineral resources that are, or may become of economic importance in the future. This means we need to include resources that may become important in the longer-term, as well as resources that are important now. We are therefore proposing review the Black Country MSAs to address these issues.

The broad extent of MSAs will be identified on the Core Strategy key diagram, as it is not possible to show detailed boundaries. The core policy will include guidance on how the authorities will manage development within MSAs, and will explain how and where detailed MSA boundaries will be defined, the approach to be adopted in the interim, and arrangements for monitoring.

It is proposed to adopt a pragmatic approach towards mineral safeguarding within the built-up areas of the Black Country. Non-mineral development will be permitted within these areas, provided that the minerals are extracted prior to development, where it is economically viable, practicable and environmentally acceptable to do so. However, where mineral extraction is not considered feasible, developers will be expected to provide evidence demonstrating this is the case.

There is no expectation that mineral resources within an MSA will necessarily be extracted. The main purpose of the MSAs is to alert land owners and developers to the existence of potentially valuable mineral resources so that they can be taken into account when a new development is proposed.

The Black Country has a variety of potentially important mineral resources which could be safeguarded, including:

- Sands and Gravels
- Brick clays (Etruria Marl)
- Coal Measures (coal and fireclay)
- Limestone
- Dolerite (known as Rowley Rag)
- Natural Building Stone (various)

The proposed extent of MSAs is shown on Plan x. Due to the complexity of the coal and fireclay deposits it is not possible to show these as MSAs although it is proposed that they should be safeguarded. A plan showing the extent of the coal and fireclay deposits in the Black Country can be found in the Black Country Minerals Study, which has been published alongside the preferred options.

Questions:

Do you agree with this general approach and do you think that these are the correct minerals to be safeguarded?

Do you agree that we should require prior extraction of minerals in advance of development where it is economically viable and environmentally acceptable to do so?

Consultation Responses from Issues and Options Paper

- Safeguard known mineral resource in the Black Country against sterilisation from other development by identifying new MSAs (including buffer zones) that cover all known mineral resources where they exist.
- All minerals in the Black Country should be defined within MSAs.
- Broad extent of MSA to be shown on the Core Strategy Key Diagram.
- MSA policy should be included in Core Strategy identifying how the authorities will deal with other forms of development affecting mineral resources.
- Need to strike a balance between the need for minerals and other types of future development.
- Authorities should strongly implement a policy of prior extraction before permanent forms of development – achieved by placing onus on developer to demonstrate extent and quality of mineral resource, and whether prior extraction is feasible.

Policy Options Considered but Rejected

The option of retaining the existing MSAs defined in the Dudley and Walsall UDPs was discussed at the Minerals and Waste Stakeholder Event held in March 2007. However, this was generally regarded as being unrealistic as the existing MSAs do not comply with current national policy guidance.

The option of defining MSAs for coal and fireclay has also been considered. However, it is difficult to show the full extent of coal and fireclay on a map alongside other mineral resources with clarity. On the advice of consultants RPS, who have carried out an extensive review of the evidence base for minerals, the authorities feel that coal and fireclay resources should be shown on a separate map.

Sustainability Appraisal

Policy is likely to have positive effects.

N.B. Options appraisal needs revising. Option a) should relate to the preferred option, i.e. identify new MSAs covering full extent of mineral resources in the Black Country that are or are likely to become of economic importance, and Option b) should have related to the "do nothing" option, which is not "no safeguarding" but "continuing to rely on existing MSAs and UDP enabling policies towards prior extraction of minerals in

advance of development.” Tesserae have been informed and have been asked to review the appraisal.

Core Policy 22 – Maintaining a Continued Supply of Aggregate Minerals in the Black Country

The Black Country is likely to witness significant building programmes over the next 20 years to deliver the regeneration strategy in this plan. Almost all building and engineering projects require aggregate minerals such as crushed rock, sands and gravels. For example, they are needed for hardcore in building foundations, for building roads and paths, and for landscaping.

Although the Black Country contributes towards regional requirements for aggregates, reserves are running low. We therefore think we need a policy setting out how the Black Country will maintain supplies of aggregates up to 2026 and beyond to address regional requirements and ensure that a supply of raw materials will continue to be available for major building and engineering projects in the Black Country. This will involve identifying an Area of Search for extraction of sands and gravels in the Aldridge and Stonnall areas in Walsall, and locations which are considered suitable for extraction in the short-term.

There are three types of aggregates occurring in the West Midlands:

- Crushed rock (sometimes referred to as hard rock)
- Sands and Gravels
- Secondary and Recycled Aggregates.

Of these, only sands and gravels and secondary/ recycled aggregates are produced in the Black Country. The core policy will therefore address future requirements for primary land-won sands and gravels only.³ The need for secondary/ recycled aggregates is addressed in Core Policy 22 below.

National guidance recommends that a 7 year landbank period is appropriate when planning for future supplies of sands and gravels. A landbank is a stock of mineral planning permissions that allows for the continual supply of specific minerals, mainly aggregates, at a level determined by the RSS for a specified period of time.

For the period 2001 – 2016 the West Midlands Region is required to make provision for 359 million tonnes (mt) of sands and gravels. It is assumed that 88mt of this will be provided by alternative sources (i.e. secondary/ recycled aggregates). Based on the regional share of production and average sales, the remaining 255mt has been apportioned by the RSS at sub-regional level.

The Black Country is expected to contribute towards the sub-regional sand and gravel apportionment for the West Midlands Metropolitan area. At present, Solihull MBC and Walsall MBC are the only mineral planning authorities that contribute towards this as they are the only authorities with permitted sand and gravel reserves. Historically,

³ Primary land-won aggregates are virgin materials extracted from quarries.

Solihull has contributed approximately 90% of the West Midlands Metropolitan area's sand and gravel supplies.⁴

However, there is no guarantee that Solihull will continue to provide sand and gravel at current rates. There is also uncertainty about whether the existing sub-regional apportionment will stay the same or change as a result of the RSS Phase 3 Revision. The Core Strategy will therefore need to be as flexible as possible in providing for future sand and gravel supplies, and will also need to establish an effective framework for data collection, monitoring and review.

It is acknowledged that permitted sand and gravel reserves are running low. At March 2007, the Black Country had less than 150,000 tonnes of permitted sand and gravel reserves remaining.⁵ The Core Strategy will therefore need to address this, by identifying resources that could address short-term supply deficiencies as well as addressing longer-term needs.

To minimise potential impacts on the environment and on local communities, it is proposed that short-term needs should be met primarily through extensions to existing quarries in the Aldridge and Stonnall areas of Walsall. There is evidence that the areas surrounding these quarries could provide enough sand and gravel to sustain landbanks in the short-term, as well as making a significant contribution towards supplies up to and beyond 2026. However, the full extent of the resources within these areas can only be established following detailed resource assessments and consideration of environmental and other impacts.

To provide certainty that the Black Country can maintain adequate supplies of sands and gravels throughout the plan period, it is suggested that an Area of Search for future mineral working should be identified in the Aldridge/ Stonnall area, including the existing quarries. This will be supported by policy guidance setting out how future extraction sites should be identified within the area in separate development plan documents such as Site Allocations DPDs. The policy will also identify key opportunities and constraints which future proposals for mineral extraction – including extensions to existing quarries – will be expected to address.

The key opportunities/ constraints affecting mineral extraction in the Aldridge/ Stonnall area are as follows:

- Need to protect groundwater – source protection zones identified around boreholes at Bourne Vale and Shire Oak
- Green Belt location – need to maintain high environmental standards during operations, after-uses restricted to “appropriate” uses only, e.g. agriculture, outdoor recreation, nature conservation
- Need to minimise visual impacts on local landscape – protecting important views in highly visible locations
- Need to minimise and mitigate impact of extraction/ restoration on nearby communities and businesses, particularly in the areas around Bourne Vale, Aldridge, Little Aston, Lazy Hill, Stonnall and Walsall Wood e.g. advance planting/ screening, “stand offs” between workings and existing development, designated

⁴ Solihull Unitary Development Plan 2006 (paragraph 11.2.5) indicates that in 2001, Solihull provided 91% of the sand and gravel for the Metropolitan area.

⁵ A Survey of Current Mineral Reserves in the Black Country: Published Report (March 2007), Scott Wilson

haulage e.g. advance planting/ screening, “stand offs” between workings and existing development, designated haulage routes using Strategic Highway Network (including A452) and avoiding residential areas

- Restrictions on fill materials used in restoration (inert only) - may affect time taken to restore sites and increase cumulative impacts
- Urban Park/ Environmental Transformation Plan – restoration schemes should contribute positively towards proposals for Biodiversity Enhancement Corridor/ Core Strategic Network

It is also proposed to address the potential future need for “borrow pits” in this policy. These are short-term mineral extraction sites related to specific construction or development projects. Within the Black Country, borrow pits may be needed to facilitate the proposed M54 to M6/ M6 (Toll) Link Road and M6 Widening. Borrow pits can help prevent sterilisation of potentially valuable mineral resources, and as the mineral is used close to the site where it is extracted they can also reduce the number of vehicle trips generated through engineering and construction projects.

Questions:

Do you agree with the general approach proposed towards addressing short-term and longer-term requirements for sands and gravels?

Are there any other specific constraints/ opportunities in the Aldridge/ Stonnall areas that should be referred to in the policy?

Consultation Responses from Issues and Options Paper

- Should identify locations within the Black Country where extraction will take place to maintain regional self-sufficiency and local availability of supplies in the longer-term and reduce dependence on importation of materials/the need to transport them long distances.
- Only areas of proven mineral resources should be identified as preferred areas and subject to the consideration of potential impacts on the environment. These areas resulting in least environmental impact should have priority.
- Mineral Industry representatives consider that there are adequate mineral resources to continue contributing to the regional apportionment.
- Mineral Industry representatives consider that there are adequate sand and gravel resources in the Black Country to enable it to continue contributing to the regional apportionment.
- Surveys have demonstrated that there are significant saleable sand and gravel resources to the south of Aldridge Quarry in the Stonnall area of Walsall.
- Environmental quality is an important issue for the Black Country – impacts of mineral extraction are long-term, therefore need to minimise adverse effects and maximise benefits (e.g. opportunities for recreation) and secure timely/appropriate restoration and after-use
- Mineral extraction should respect wildlife corridors and other important environmental assets and restoration schemes should be designed to be beneficial for biodiversity, geodiversity (e.g. maintaining exposures of features of geological importance).
- Restoration of mineral workings has potential to contribute to the environmental assets of the area, however it is acknowledged that inert materials for restoration purposes may be in short supply, and may be more appropriately used as

alternatives to primary minerals. Therefore restoration schemes should take account of this issue.

- Where mineral resources are within groundwater protection zones or near surface watercourses need to have policies in place that will prevent pollution from mineral extraction and subsequent restoration and possible damage to the canal network arising from mineral extraction.
- Protecting local communities - the concentration of development can present issues with identifying stand-offs or buffer zones around mineral sites to protect local amenity, although these need not be particularly wide in the case of non-residential uses.

Policy Options Considered but Rejected

The option of identifying preferred areas for future sand and gravel extraction in the Core Strategy was considered. However, operators have not come forward with evidence of proven resources, other than in locations adjacent to existing quarries. It is therefore proposed to identify extensions to existing quarries as the preferred short-term option for meeting the shortfall in supply. It is also proposed to identify an Area of Search within which preferred locations/ site allocations may be defined in other DPDs, to meet longer-term needs.

Sustainability Appraisal

Policy is likely to have positive effects.

N.B. Options appraisal needs revising as the Options to be appraised should be as follows: Option a) Allow for sand and gravel extraction at levels that reflect local demand for building and engineering materials and address regional requirements – even if these increase; Option b) Impose strict limitations on sand and gravel extraction to minimise impact on Green Belt/ local environment, which is likely to constrain supplies and mean that more materials have to be imported into the area from elsewhere with consequent impacts on the local highway network. Tesseræ have been informed and have been asked to review the appraisal.

Core Policy 23 – Supply of Clay to Brickworks

Bricks are used mainly in small-scale buildings such as new homes. The demand for bricks is likely to continue and may even increase between now and 2026, given the scale of house-building proposed.

There has been a long tradition within the Black Country of brick making. The Black Country's remaining brickworks still use locally sourced clays to make bricks. They make an important contribution to the local economy as well as creating natural building products that can contribute towards local character and distinctiveness (see Core Policy 16).

We therefore think we need a policy aimed at maintaining a continuing supply of clay to local brickworks for as long as possible, including the provision of safeguarded areas for storing extracted clay. This may involve identifying locations suitable for future clay extraction and for clay stockpiling in the Kingswinford/ Pensnett areas of Dudley and the Stubbers Green/ Shelfield areas of Walsall.

There are two types of brick clays present in the Black Country:

- Clays from the Etruria Formation (Etruria Marl)
- Fireclay (associated with coal seams).

Both clays are nationally scarce, and it is an objective of national policy guidance (MPS1: Planning and Minerals, paragraph 13) to safeguard and if necessary stockpile supplies of such materials.

Where brick clays occur, mineral planning authorities are required to provide a stock of permitted reserves sufficient to provide for 25 years of production at each new or existing brick manufacturing plant. As there is no regional or sub-regional apportionment for brick clay the 25-year supply requirement is intended to be applied to individual brick works rather than aggregated across the Black Country. The supply situation therefore needs to be considered on a case-by-case basis.

There are currently 7 brickworks in/ adjacent to the Black Country⁶ all but one of which is associated with a clay pit producing Etruria Marl. The exception is a works producing limited quantities of bespoke bricks using small quantities of imported clays supplied by its parent company.

All Black Country brickworks use Etruria Formation clays for their main brick production, and these are mostly sourced locally from clay pits adjacent to the works. However, in some cases, permitted reserves are running low (in three cases less than 15 years' supply) and only one works currently has a 25 year supply. Although there are extensive deposits of Etruria Formation clays in Dudley and Sandwell, most of these resources are sterilised by development. The only areas likely to have potential for future working are the Kingswinford/ Pensnett areas of Dudley, and the Stubbers Green/ Shelfield areas of Walsall.

Some works also use clays derived from Mercia Mudstone which are imported as this does not occur locally. Buff clays (fireclays) are also used, which are also imported because although these do occur locally, there are no active mines or quarries in the Black Country producing this material. There is also a local demand for fireclay for pottery-making, which is currently only being met from stockpiles.

Most of the Black Country's fireclay resources (which are associated with areas of shallow coal) are also sterilised by development. However, extraction of shallow coal and fireclay deposits may be feasible prior to development (see Core Policy 17). The only area likely to have potential for large-scale working of coal and fireclay is the Brownhills area of Walsall. Part of this area is covered by a dormant mineral permission for opencast coal extraction at Brownhills Common. Core Policy 20 addresses issues relating to the extraction of coal at Brownhills Common and in the surrounding areas.

The most pressing priority is to address deficiencies in the supply of Etruria Formation clays to local brickworks. Subject to agreement with the manufacturers, it is proposed that the policy will identify measures aimed at addressing deficiencies at brickworks with less than 25 years' supply. Where it is not possible to identify specific measures/ extraction sites in the Core Strategy, the policy will set out a framework for identifying Areas of Search, new extraction sites and sites suitable for storage/ stockpiling of clays

⁶ Including one just outside Dudley MBC's administrative boundary associated with a clay pit within the Borough.

in future development plan documents. It will also identify key opportunities and constraints within the Kingswinford/ Pensnett and Stubbers Green/ Shelffield areas which future mineral extraction proposals will be expected to address.

The key opportunities/ constraints affecting mineral extraction in the Kingswinford/ Pensnett and Stubbers Green/ Shelffield areas are as follows:

- Green Belt location – need to maintain high environmental standards during operations, after-uses restricted to “appropriate” uses only, e.g. agriculture, outdoor recreation, nature conservation
- Impact on sites of importance for biodiversity – need to fully assess potential impacts on SSSIs and SINCs
- Need to minimise visual impacts on local landscape – protecting important views in highly visible locations
- Need to minimise and mitigate impact of extraction/ restoration on nearby communities and businesses, particularly in the areas around Kingswinford, Pensnett, Aldridge, Lazy Hill, Shelffield and Walsall Wood e.g. advance planting/ screening, “stand offs” between workings and existing development, designated haulage routes using Strategic Highway Network (including A4101, A491 in Dudley, A462, A452 in Walsall) and avoiding residential areas
- Sustainable transport – proposals for future clay extraction in the Kingswinford/ Pensnett area should address the potential to transport materials by rail rather than road
- Regeneration Corridor 10: Pensnett/ Kingswinford – proposals for clay extraction/ restoration within the Kingswinford and Pensnett areas should contribute positively towards the strategy for the regeneration corridor (see section xxx).
- Urban Park/ Environmental Transformation Plan – restoration schemes should contribute positively towards proposals for Biodiversity Enhancement Corridors/ Core Strategic Network

As it is unlikely to be possible to identify large-scale local sources of fireclay in the short-term, the policy will also need to allow for importation of clays and for storing and stockpiling of material close to brickworks. The potential impacts of importation of materials on the local highway network also need to be addressed. Although there is unlikely to be scope to transport materials by rail to works in Walsall, this may be feasible for works in Dudley, and the core policy will address this.

As there is currently no formal mechanism for monitoring supply of clay to brickworks it will be necessary to devise a method of collecting data on a regular basis, to ensure that provision can continue to be monitored throughout the lifetime of the plan.

Questions:

Do you agree with the proposed approach towards maintaining supplies of clay to local brickworks and if necessary, identify locations suitable for stockpiling supplies of clay?

Are there any other specific constraints/ opportunities in the Kingswinford/ Pensnett and Stubbers Green/ Shelffield areas that should be referred to in the policy?

- Should take account of the need to provide a stock of permitted reserves of brick clay for 25 years of production for each new or existing brick manufacturing plant – this requirement should be met on a site specific basis rather than using aggregated data.
- Discussions with brick manufacturers following the Issues and Options consultation have clarified the supply situation at each brick works – long-term supply problems have been identified at three brick works with regard to Etruria Formation clays, and several brick works have also indicated a demand for fireclay.
- There is a demand for fireclay for pottery-making as well as for brick making – local supplier of clay blends has indicated that they are currently relying on stockpiles and are concerned about future supplies
- Land at Yorks Bridge (partly in Cannock Chase in Staffordshire, partly in Walsall) has been put forward as a site for potential future opencast coal working – surveys have demonstrated that this contains significant resources of coal and fire clay.
- Environmental quality is an important issue for the Black Country – impacts of mineral extraction are long-term, therefore need to minimise effects and maximise benefits (e.g. opportunities for recreation) and secure timely/appropriate restoration and after-use
- Mineral extraction should respect wildlife corridors and other important environmental assets and restoration schemes should be designed to be beneficial for biodiversity, geodiversity (e.g. maintaining exposures of features of geological importance).
- Where mineral resources are within groundwater protection zones or near surface watercourses need to have policies in place that will prevent pollution from mineral extraction and subsequent restoration and possible damage to the canal network arising from mineral extraction.
- Protecting local communities - the concentration of development can present issues with identifying stand-offs or buffer zones around mineral sites to protect local amenity, although these need not be particularly wide in the case of non-residential uses.

Policy Options Considered but Rejected

No options specifically relating to supply of clay to brickworks have been considered.

Sustainability Appraisal

Policy is likely to have positive effects.

N.B. Options appraisal needs revising as the Options to be appraised should be as follows: Option a) Aim to make provision for 25-year supply of Etruria Marl to each brickworks, which would involve identifying new extraction sites; Option b) Impose strict limitations on extraction of brick clays to minimise impact on Green Belt/ local environment, which may constrain supplies and mean that more materials have to be imported and/ or that some brickworks may have to close. Tesserae have been informed and have been asked to review the appraisal.

Core Policy 24 – Energy Minerals

Although there are extensive coal seams present within the Black Country, there are no opencast coal workings in the Black Country at the present time. It is possible that extraction of coal may become viable in the future, given the current concerns over security of energy supplies.

Coal seams are also associated with valuable deposits of fireclay, which is used for brick- and pottery-making. However, as fireclay is no longer produced locally, almost all the fireclay used by Black Country brickworks has to be imported from elsewhere.

Unfortunately, most of the Black Country's coal resources have been sterilised by non-mineral development. The only areas in the Black Country likely to have potential to be worked in the future are areas of open countryside in Brownhills in Walsall, which are currently not affected by mineral working, some of which are important for nature conservation and recreation. We therefore think we need a policy that addresses both the potential need for extraction of coal and fireclay in the future, and potential impacts on the local environment.

There are currently no targets for the supply of energy to be derived from separate fuel sources. However Government policy does acknowledge that coal resources may contribute to energy supply where it can be extracted and used in an environmentally acceptable way. There are also no targets for production of fireclay, which is associated with coal seams. Several local brick works use fireclay in their blends, but at present they rely on stockpiles and imports for supplies as there are no workings within the Black Country producing this material (see Core Policy 19).

Within the built-up areas there may be potential to extract shallow deposits of coal and fireclay on a small-scale in advance of redevelopment schemes (see Core Policy 17). However, the only areas likely to offer potential for large-scale working of coal and fireclay are the areas of open land around Brownhills and Pelsall, on the northern edge of Walsall Borough.

This area is within the Green Belt, and is currently not affected by mineral working. It also includes important areas for nature conservation and recreation, such as Pelsall Common North (SINC and LNR) - which also includes part of the Cannock Extension Canal SAC - and Brownhills Common (SINC and proposed LNR). The former Stourbridge to Derby railway line, which runs along the edge of this area, is proposed for reinstatement, and may offer potential to transport materials by rail rather than road.

There is a dormant mineral permission for opencast coal extraction at Brownhills Common dating back to the 1950s. However, this cannot be implemented without an approved scheme of modern conditions under Section 96 of the Environment Act 1995. In addition, a local land owner has put forward a proposal on land near to Brownhills Common as a potential extraction site. This proposal is known as Yorks Bridge and lies mostly within Cannock Chase District in Staffordshire, extending partly into Walsall Borough.

A major study into the coal strata of the Black Country has recently been commissioned by the Coal Authority. This is expected to be published shortly, and may provide further

clarification on the importance and economic potential of the Black Country's coal resources. The scope for coal bed methane production and processing and underground coal gasification has also not been fully explored, and it is recognised that further evidence is required to support the development of policy in this area, including further consultation with the Coal Authority.

Nevertheless, there are major concerns about the impact of opencast coal extraction on the local environment and on local communities. There are also concerns about how it might affect the image of the area and the proposed regeneration of Brownhills. Although opencast coal working may be a relatively short-lived operation and provides opportunities for environmental enhancements in the medium-term, its impact can be very significant whilst operations are underway. As well as potential impacts on the local environment and local communities, there are more specific concerns about the potential impacts of the Yorks Bridge proposal on Cannock Chase SAC and Cannock Extension Canal SAC, which have not been assessed.

It is therefore proposed that the Core Strategy should only permit opencast coal extraction where:

- It will support the regeneration of the Black Country
- It will support the positive transformation of the Black Country environment and implementation of the Urban Park
- It will not have an adverse effect on local communities or on the integrity of important environmental assets, including European sites
- There is a clear start-date and end-date for working, and a programme for restoration
- As much fireclay as possible will be extracted and either supplied directly to local users for brick or pottery making, or stockpiled in an appropriate location for future use
- The potential to transport materials by rail rather than road has been fully explored.

Questions:

Do you think that the proposed approach towards opencast coal and fireclay extraction is appropriate, i.e. that it should not be permitted unless it can be demonstrated that it will not have an adverse impact on the environment and on the future regeneration of the Black Country?

Do you think that the proposed criteria for considering future opencast coal and fireclay working proposals are appropriate?

Consultation Responses from Issues and Options Paper

- Should allow small-scale extraction of coal and other minerals prior to redevelopment within areas where reserves are known to be present to avoid sterilisation
- Land at Yorks Bridge (partly in Cannock Chase in Staffordshire, partly in Walsall) has been put forward as a site for potential future opencast coal working – surveys have demonstrated that this contains significant resources of coal and fire clay
- Environmental quality is an important issue for the Black Country – therefore need to minimise adverse effects of mineral extraction and maximise benefits

(e.g. opportunities for recreation) and secure timely/appropriate restoration and after-use

- Mineral extraction should respect wildlife corridors and other important environmental assets and restoration schemes should be designed to be beneficial for biodiversity, geodiversity (e.g. maintaining exposures of features of geological importance).
- Restoration of mineral workings has potential to contribute to the environmental assets of the area, however it is acknowledged that inert materials for restoration purposes may be in short supply, and may be more appropriately used as alternatives to primary minerals. Therefore restoration schemes should take account of this issue.
- Where mineral resources are near surface watercourses need to have policies in place that will prevent pollution from mineral extraction and subsequent restoration and possible damage to the canal network arising from mineral extraction.
- Protecting local communities - the concentration of development can present issues with identifying stand-offs or buffer zones around mineral sites to protect local amenity, although these need not be particularly wide in the case of non-residential uses.

Policy Options Considered but Rejected

The option of identifying areas for future coal extraction has been considered. However, due to major concerns about the potential impact of opencast coal extraction on the local environment and on local communities, this is felt to be inappropriate. There is also insufficient evidence that the Yorks Bridge proposal can be implemented without detrimental impacts on the integrity of European sites.

Sustainability Appraisal

Approach is likely to help protect the environment, but other impacts are uncertain.

N.B. Options appraisal needs revising as the Options to be appraised should be as follows: Option a) Allow for opencast coal and fireclay extraction to provide energy minerals for the future/ supplies of fireclay for brick and pottery making; Option b) Presumption against opencast coal and fireclay extraction to minimise impact on Green Belt/ local environment, which would mean the Black Country would not be able to provide energy minerals in the future and that fireclay will continue to be imported into the area in the long-term with consequent impacts on the local and regional highway network. Tesserae have been informed and have been asked to review the appraisal.

Core Policy 25 – Natural Building Stone

The Black Country does not currently produce any natural stone for building, and most of the stone that occurs in the area is of poor quality. However, in the past, such resources were exploited for building where they were of sufficient quality, and this has contributed to the character of Black Country towns, notably Dudley Town Centre.

English Heritage has produced a draft position statement on Mineral Extraction and the Historic Environment, which stresses the need for supplies of natural building stone for the conservation and repair of historic buildings.

The availability of these materials could make an important contribution towards maintaining local character in line with Core Policy 17. We therefore think we need a policy that permits extraction of small quantities of natural building stone within the Black Country, where this can assist with the conservation and repair of local historic buildings and structures.

The most important local building stones used in historic buildings in the Black Country are as follows:

- Rowley Rag – dolerite, sourced mainly from outcrops in Rowley Regis and Pouk Hill, Walsall; most commonly used for kerbstones and stone setts, but also occasionally used as a building stone e.g. St. Anne's Church, Willenhall, Walsall
- Limestone – sourced from various locations in Dudley and Walsall, used both for hydraulic lime and as a building stone, e.g. St. Michael's Church, Rushall, Walsall, various buildings in Dudley Town Centre e.g. Dudley Castle Lodge, Fountain, Market Square
- Gornal Stone – sandstone, sourced from Gornal/ Ruiton in Dudley, used as a building stone in historic buildings in the Gornal area and used as dividing walls in several buildings in Dudley Town Centre.

In addition to the above, the Black Country Minerals Study has identified potential resources of natural building stone in the Halesowen and Pedmore areas of Dudley.

It is considered that extraction of such stone should be permitted where the following criteria are met:

- The proposal will assist with the conservation and repair of specific historic buildings or structures built of the same or similar materials
- There is evidence that buildings or structures of the same material make a significant contribution to the character of the area, e.g. it is referred to in a historic landscape character assessment or Conservation Area Character Appraisal
- Operations are strictly time-limited, with a clear start-date and end-date for working, and a programme for restoration
- Operations will not have an adverse effect on local communities or important environmental assets, including other historic buildings/ structures and sites of importance for biodiversity/ geodiversity

- Restoration should contribute positively towards local biodiversity and geodiversity, by exploiting opportunities to create wildlife habitats linked to existing wildlife corridors, and opportunities to create new geological exposures.

Question: Do you think that local natural building stone should be exploited where it would assist in the conservation and repair of historic buildings and/or make a positive contribution to local character?

Consultation Responses from Issues and Options Paper

- The Core strategy should promote the aspiration for improvement in the overall quality of the sub-region's natural, built and historic environment
- Environmental quality is an important issue for the Black Country – therefore need to minimise adverse effects of mineral extraction and maximise benefits (e.g. opportunities for recreation) and secure timely/appropriate restoration and after-use
- Mineral extraction should respect wildlife corridors and other important environmental assets and restoration schemes should be designed to be beneficial for biodiversity, geodiversity (e.g. maintaining exposures of features of geological importance).

Policy Options Considered but Rejected

The option of including a policy on natural building stone was not originally considered, but after seeking advice/ further information from conservation officers, it was felt that there was sufficient justification to include an “enabling” policy in the Core Strategy.

Sustainability Appraisal

This needs to be added as this is a new policy not previously appraised. Likely to have positive effects – in terms of options the following need to be appraised: Option a) Do nothing i.e. don't allow for extraction of natural building stone; Option b) Allow extraction of natural building stone on a small-scale linked to specific conservation projects, subject to appropriate safeguards. Tesseræ have been informed of this new policy and have been asked to appraise it.

Core Policy 26 – Prudent Use of Mineral Resources

Minerals are a finite resource and need to be carefully used. National policy guidance requires mineral planning authorities to take account of the contribution that substitute or recycled materials would make to supplies, before considering extraction of primary minerals (paragraph 15, MPS1: Planning and Minerals). Therefore, a key objective of the Core Strategy should be to maximise use of alternatives to primary minerals.

Much of the production of alternative materials is believed to take place on-site using mobile plant. Such operations are outside the scope of the Core Strategy, which can only address the need for permanent secondary/ recycled aggregates production facilities. We think we need such a policy in the Core Strategy, to safeguard existing production sites and identify other locations that may be suitable for the development of new facilities.

The provision of more permanent production facilities in the Black Country would support Core Policy 16, which seeks to encourage sustainable construction in the Black Country. It would also support Core Policy 41 by promoting recovery and re-use of construction, demolition and excavation waste and other waste materials, thereby minimising the amount of waste sent to landfill.

The current aggregates apportionment for the West Midlands region includes an assumption that 88 million tonnes out of the 359 million tonnes of aggregates required during the period 2001 – 2016 will be obtained from alternative sources. This equates to around 5.87 million tonnes per annum. However, recent research suggests that alternative materials are being produced at a slightly lower rate than anticipated (around 5.06 million tonnes in 2005).⁷ The current aggregates apportionments are to be reviewed as part of the RSS Phase 3 Revision, and may therefore change.

The most common source of alternative material used to produce alternatives to primary minerals is construction, demolition and excavation waste (CD&EW), which may be crushed and processed and used as a recycled aggregate. Other waste materials, such as bottom or fly ash resulting from thermal processes /energy recovery facilities, can also be used as an aggregate. To avoid duplication, the management of CD&EW will be addressed in this policy rather than in Core Policy 26, which covers other resource recovery operations.

As a significant amount of redevelopment/ development is planned in the Black Country during the next 20 years, it is important to encourage prudent use of construction materials, including use of renewable materials and other alternatives to primary mineral resources wherever possible. The emerging RSS Phase 2 Revision requires local planning authorities to address such issues through local development documents (Policy SR3). It suggests major development schemes should demonstrate that at least 25% of the minerals used derive from secondary or recycled sources. The implications of RSS Policy SR3 are addressed in Core Policy 16.

⁷ Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005: Construction, Demolition and Excavation Waste and Survey of Arisings and Use of Alternatives to Primary Aggregates in England 2005: Other Materials (February 2007), Capita Symonds Ltd/ WRc Ltd for DCLG

There is also a requirement in the emerging RSS Phase 2 Revisions for local development frameworks to give specific priority to identifying new sites for facilities to store, treat and recycle soils and construction and demolition waste (Policy W9). In addition, there is a specific requirement for the Black Country Core Strategy to identify sites for facilities to store, treat and remediate contaminated soils (Policy W10).

There are five sites producing secondary/recycled aggregates in the Black Country, including major facilities operated by Midland Quarry Products at Bescot Sidings and Ettingshall. In addition to these there is a proposal in the pipeline to develop a major new facility in Leamore in Walsall, which will recover aggregates from a range of dry wastes. However, there are no facilities that handle contaminated soils, and there are no such proposals in the pipeline. Early on in the consultation process, Dudley Developers' Forum identified this as an important gap in waste management provision, which they felt could be a barrier to the remediation of previously-developed sites. AWM has also commented that the time taken to process contaminated soils is also a problem for developers.

A national survey of alternatives⁸ to primary aggregates carried out by Capita Symonds in England 2005 concluded that recycled CD&EW is already making a significant contribution to the supply of aggregates in the West Midlands. Much of this recycling happens "on-site" following demolition, using mobile crushers, rather than at permanent facilities such as those listed above. There is at present no mechanism for monitoring the production of alternative materials from mobile crushers, so the only source of information is through periodic surveys such as this.

A more detailed study of the West Midlands Metropolitan area carried out by the Waste and Resources Action Programme (WRAP), also in 2005,⁹ found that recycling of CD&EW was already taking place at rates close to optimum viable levels, with the exception of contaminated soils, for reasons of viability. It is recognised that there are currently no facilities in the Black Country with the capability of treating, contaminated soils and that in line with the emerging RSS Policy W10 (RSS Phase 2 Revision), the Core Strategy will need to identify locations suitable for the development of such facilities.

The recycling of CD&EW involves crushing and screening operations which can be noisy and dusty, particularly where they are carried out in the open. Where they are dependent on road access, they can also generate significant numbers of heavy vehicle movements on the highway network. The authorities therefore consider that such operations should not be located close to housing or other sensitive uses, and that road haulage routes should avoid residential areas.

This is likely to limit the scope for the development of such facilities in the Black Country. An important part of the strategy will therefore be to safeguard existing facilities that are currently producing these materials, particularly where these are well-located and have scope for expansion without having unacceptable impacts on neighbouring uses.

⁸ Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005: Construction, Demolition and Excavation Waste and Survey of Arisings and Use of Alternatives to Primary Aggregates in England 2005: Other Materials (February 2007), Capita Symonds Ltd/ WRc Ltd for DCLG

⁹ The Sustainable Use of Resources for the Production of Aggregates in England (2006), WRAP

Further work needs to be done to identify locations suitable for new facilities for producing secondary/ recycled aggregates from CD&EW and other materials. The authorities consider that the following criteria are important:

- Scope to transport materials by rail – locations should ideally be adjacent to a railhead or siding or a railway line where there is potential to develop a railhead or siding
- Scope to identify road haulage routes that avoid residential areas, where use of rail is not an option
- Scope to carry out operations within a building or enclosure where it can be screened from residential areas or other sensitive uses.
- Scope to identify sites within the Black Country suitable for the full range of treatment processes required for CD&EW classified as hazardous, including bioremediation of contaminated soils.

Questions:

Do you think that the proposed approach towards encouraging use of alternatives to primary mineral resources is appropriate?

Do you think that the criteria for identifying locations for secondary/ recycled aggregates production are the right ones – are there any others?

Consultation Responses from Issues and Options Paper

- Should reflect the importance of secondary/recycled aggregates in meeting future requirements by making provision for increased production and restricting quantities of inert construction and demolition waste sent to landfill
- Need to consider wider issues relating to use and conservation of mineral resources such as re-use and recycling of buildings and building materials – suggestion that we include targets for re-used/recycled materials in new development.
- Need to protect existing secondary and recycled aggregates production facilities from other development where these are located, for example within strategic corridors.
- Facilities should be in places where effects (including traffic) do not restrict or negatively influence other developments such as housing and employment, if possible exploiting opportunities to transport materials by rail rather than by road.
- May not be possible to identify suitable locations within the Black Country for bio-remediation of contaminated soils.

Policy Options Considered but Rejected

Options relating to conserving resources and increasing production of secondary/ recycled minerals were discussed at the Minerals and Waste Stakeholder Event held in March 2007. There was general consensus that these were not separate options and that both strategies should be pursued.

Encouraging re-use and recycling of buildings/ discouraging demolition have also been considered as possible options - see Core Policy 16

Sustainability Appraisal

This is likely to have positive effects.

In terms of options the following need to be appraised: Option a) Do nothing i.e. don't make provision for facilities to produce alternatives to primary mineral resources from CD&EW and other waste materials; Option b) include a policy seeking to safeguard existing production sites/ identify locations suitable for the development of new facilities to process wastes into alternative materials which can be used as substitutes for primary mineral products. Tesserae have been informed and have been asked to review the appraisal.

DRAFT

Direction of Change 3 :Economic Prosperity

Making the most of the Black Country's accessibility and location to attract new employment opportunities and investment in innovation and new technology and deliver a network of successful strategic, town, district and local centres to improve the wealth and image of the Black Country.

This direction of change relates particularly to the following spatial objectives:

- Providing sufficient land for new high technology and logistics in accessible locations throughout the employment led corridors
- Investing and development in comparison shopping, office led employment, leisure, tourism and cultural facilities focussed on the four strategic centres
- Accessible services and facilities

Core Policy Areas:

- Reinforcing the importance of the Black Country's centres for the regeneration strategy
- Directing RSS retail and office development requirements to the strategic centres
- Recognise the importance of the town and large district centres
- Controlling out of centre development
- Providing the transport requirements to support the strategy
- Establishing parking standards
- Improving the Highway Network
- Support the effective movement of freight
- Providing for economic growth
- Provision of High Quality Employment Land
- Providing and safeguarding Local Employment Land
- Providing for Offices and services
- Accommodating Bad Neighbour Uses
- Clustering High Technology Businesses
- Improving Access to the labour market
- Addressing the Black Country's Waste and Resource management Requirements
- Resource Recovery Operations and Ancillary Infrastructure
- Landfill
-

Core Policy Areas

Core Policy Area 27 – Reinforcing the importance of the Black Country Centres for the Regeneration Strategy –

We think we need a core policy that reinforces the importance of the Black Country's centres for the regeneration strategy, particularly the four strategic centres of Brierley

Hill, Walsall, West Bromwich and Wolverhampton. However, all of the Black Country centres should be the primary locations for appropriate levels of investment in shopping, leisure and entertainment, culture and office employment. The concentration of investment within the centres is the best way to achieve transformation, to develop investment markets, make the fullest possible use of existing buildings and infrastructure and provide the best access by a choice of means of transport to a range of opportunities for residents, workers and visitors.

In order to achieve the maximum amount of investment and ensure an appropriate share of this investment across all areas, it will be necessary to identify a hierarchy of centres across the Black Country.

Current Centre Designations in the Black Country, from Dudley, Sandwell, Walsall and Wolverhampton Unitary Development Plans and with Reference to the emerging RSS Phase 1 Revision				
Local Authority	Dudley	Sandwell	Walsall	Wolverhampton
RSS 'Strategic' Centres	Dudley ¹	West Bromwich	Walsall	Wolverhampton
Proposed Strategic Centre	Brierley Hill / Merry Hill ²			
Other Town / Large District Centres	Halesowen Stourbridge Brierley Hill High St ³ Kingswinford Lye Sedgley	Blackheath Cradley Heath Great Bridge Oldbury Wednesbury Cape Hill Bearwood	Bloxwich Brownhills Aldridge Willenhall Darlaston	Bilston Wednesfield
Small District / Local Centres	Amblecote Cradley / Windmill Hill Gornal Wood Netherton Pensnett Quarry Bank Roseville Shell Corner The Stag Upper Gornal Wall Heath Wollaston Wordsley	Smethwick High Street Tipton Scott Arms Carter's Green Quinton Princes End Old Hill Stone Cross Langley Hamstead Rood End Queens Head - Bristnall Smethwick Lwr High St	Caldmore Stafford Street Pleck Pelsall Leamore Palfrey Walsall Wood High St Rushall Blakenall Lane Head Streetly Queslett Lazy Hill New Invention Bentley Park Hall Moxley Fullbrook	Stafford Road (Three Tuns) Cannock Road (Scotlands) Tettenhall Village Whitmore Reans/ Avion Ctr Broadway Bushbury Lane Showell Circus Wood End Stubby Lane Heathtown Parkfield Spring Hill Penn Manor Upper Penn Pennfields Bradmore Merry Hill Castlecroft

Current Centre Designations in the Black Country, from Dudley, Sandwell, Walsall and Wolverhampton Unitary Development Plans and with Reference to the emerging RSS Phase 1 Revision				
Local Authority	Dudley	Sandwell	Walsall	Wolverhampton
RSS 'Strategic' Centres	Dudley ¹	West Bromwich	Walsall	Wolverhampton
			Collingwood Dr, Pheasey Birchills Coalpool / Ryecroft Beechdale The Butts Spring Lane, Shelfield Beacon Road, Pheasey Brackendale Woodlands Shelfield South Mossley Dudley Fields Streets Corner Buxton Road, Bloxwich Coppice Farm Darlaston Green Turnberry Road, Bloxwich	Finchfield Tettenhall Wood Newbridge Aldersley Pendeford Park Fallings Park Ashmore Park Compton Village Warstones Road Dudley Road / Blakenhall

1. Dudley is proposed under the RSS phase 1 revision to no longer be a 'strategic' centre.
2. Brierley Hill / Merry Hill is proposed under the RSS phase 1 revision to become a 'strategic' centre: 'Brierley Hill'.
3. Brierley Hill High Street is proposed under the RSS phase 1 revision to become part of the Brierley Hill 'strategic' centre.

The status of Brierley Hill (including Merry Hill and the Waterfront), Walsall, West Bromwich and Wolverhampton as strategic centres has been confirmed through the Phase 1 Revision and is reflected in the emerging Phase 2 Revision.

It is also considered that given their scale and the facilities they provide it is right to carry forward from the existing UDPs the designations of the smaller town / larger district centres. However, whilst existing centres are generally in need of regeneration and are well-placed to serve future needs, the growth in population that is being promoted in particular areas (corridors) there may be a need for the designation of smaller district and/ or local centres to be reviewed and possibly for new small district or local centres to be designated. This issue will be considered through the forthcoming technical work on the smaller centres and on the needs for convenience shopping once the scale and locations for housing growth have been chosen following this consultation.

As the area's centres need to be strengthened, new development should be well-integrated with existing provision. Other activities such as offices and housing might be accommodated on upper floors as well as on the edge of centres, and mixed use developments will be encouraged to generate a wide range of activities and to make the fullest use of land and buildings in centres. In addition, the policy will need to provide for centres to be expanded where necessary and appropriate.

To reflect the individual characters of the centres in the Black Country the Core Strategy should seek to protect and enhance particular assets in different centres, for example the modern architecture of Brierley Hill, the Edwardian heritage of Walsall and Wolverhampton, the markets in Walsall, Wednesbury and other centres, and the traditional Black Country character in Dudley, Stourbridge, Bilston and Willenhall. To provide attractive focal points the policy will need to ensure centres will be safe, well-managed and priorities for environmental and transport improvements.

Consultation Responses from Issues and Options Paper

The consultation responses recognised centres and town centre uses as playing an important role in regeneration. They also supported the view that the Black Country's centres are generally weaker than those in surrounding areas and are themselves in need of regeneration and that planning policy should be used to support this.

Many representations recognised the importance of the strategic centres as engines of economic development being best-placed to attract investment in comparison shopping, leisure and office development. On the other hand, representations from local residents tended to express the view that the smaller traditional Black Country centres should be especially supported to reduce the need to travel and meet the needs of elderly people.

Various representations identified improvements to centres and the need for them to offer a range of facilities in enhanced environments and supported by transport improvements.

Sustainability Appraisal

To be completed

Core Policy Area 28 – Directing the RSS retail and office development requirements to the Strategic Centres –

We think there is a need for a core policy that will set out how the amounts of comparison retail and office development proposed through the RSS process, will be managed. This will ensure that all of the strategic centres will secure an appropriate share of comparison retail and office development, while at the same time ensuring that investment that could regenerate the Black Country as a whole will not be lost. The policy will also identify the roles of the strategic centres as the principal locations for leisure, entertainment and cultural facilities and also recognise these centres will also have important roles as focal points for the communities they serve.

RSS Phase 1 proposed amounts of comparison retail and office floorspace for the period up to 2021, and these reflected an agreement between the Black Country authorities in July 2005 that the amounts of comparison retailing put forward for Walsall and West Bromwich should be increased to strengthen their market shares compared to Brierley Hill and Wolverhampton. It was also agreed that, after allowing for commitments, the amount of office floorspace needed to support the strategy for the Black Country (but excluding existing out-of-centre commitments, particularly the 'I54'

site on the boundary between Wolverhampton and South Staffordshire District) should be split equally between the four strategic centres. However, the Panel for the RSS Phase 1 Examination said that the figures should be reviewed through RSS Phase 2, and the submission version of that Revision proposes amounts of comparison retail and office floorspace up to 2026 (including the adjustment to increase the amounts of comparison retailing proposed for Walsall and Wolverhampton). The amounts of floorspace proposed for the strategic centres through the RSS Phase 1 and Phase 2 Revisions are set out in the following Table.

	Comparison Retail Floorspace					Office Floorspace	
	RSS Phase 1 – to 2021	Market Share, between the four centres	RSS Phase 2 – to 2021	RSS Phase 2 – 2021 to 2026	Market Share, between the four centres	RSS Phase 1 – to 2021	RSS Phase 2 – to 2026
Wolverhampton	54,000	29%	70,000	30,000	28%	186,000	220,000
Brierley Hill	51,000	28%	65,000	30,000	28%	186,000	220,000
Walsall	45,000	24%	60,000	25,000	24%	186,000	220,000
West Bromwich	35,000	19%	45,000	25,000	20%	186,000	220,000
Non-Strategic Centres	51,000	-	Needs to be Checked	Needs to be Checked	-	Nil	Nil

Source: RSS Phase 1 Revision, Secretary of State's Proposed Changes (September 2007) & RSS Phase 2 Submission (December 2007)

- All floorspace figures are in sq.m. (gross).
- The figures exclude commitments, for example the existing commitment at Summer Row in Wolverhampton would take up 51,000 of the 54,000 sq.m. needed up to 2021 according to the RSS Phase 1 Revision, leaving a requirement for a further 3,000 sq.m. of floorspace.
- Office figures refer to offices in Use Class B1(a)

The figures for the RSS Phase 1 revision were based upon an ambitious regeneration strategy, yet (because of changes in assumptions relating to internet shopping and the extension of the timescale to 2026) the figures from the RSS Phase 2 Revision are significantly higher.

If the level of investment envisaged for the four strategic centres is not fulfilled, there could be a danger the investment would be lost to the area. There is considerable interest in comparison retail development in Brierley Hill, and Wolverhampton. However, the centres of Walsall and West Bromwich are relatively weak and there is a danger that ever-increasing amounts of development in the other strategic centres (as well as in Birmingham and pressures for decentralisation to the surrounding shire area) could make it increasingly difficult to secure the investment Walsall and West Bromwich need for the four centres strategy to be realised.

This issue has been considered by the RSS Phase 1 Revision Examination Panel and through the RSS Phase 2 revision, with differing views emerging. To find a way forward involves balancing the issues: on one-hand no controls could mean a two-centre rather than a four centre strategy for the Black Country, on the other too strict controls could contradict the general regeneration strategy and the position established through the RSS Phase 1 Examination. It needs also to be borne in mind that whilst development at Brierley Hill is dependent on planning policy requirements (an Area Action Plan, improved public transport links and a car park management regime), there are no controls on the phasing of the 51,000 sq.m. gross of comparison retailing that has been

permitted in Wolverhampton. It is also considered the approach taken towards office development should be consistent with that for retailing.

Therefore, we need a policy area along the lines of the following:

- a) Up to 2016 each of the strategic centres shall be encouraged to accommodate the amount of development identified for it in the RSS Phase 1 Revision in terms of comparison retail floorspace (54,000 sq.m. gross for Wolverhampton, 51,000 sq.m. gross for Brierley Hill, 45,000 sq.m. for Walsall and 35,000 sq.m. for West Bromwich) and B1a office floorspace (186,000 sq.m. for each strategic centre).
- b) Up to 2016 any proposal, whether through a development plan or a planning application, that would lead to the amount of floorspace in an individual strategic centre exceeding the figures given above, would only be allowed if all of the following requirements are satisfied:
- a demonstrated need for the development to serve that centre's catchment area
 - that the development is appropriate for the role and function of the centre.
 - it is demonstrated that there would not be an adverse impact on the trade and /or investment in any other strategic centre necessary to support the regeneration strategy;
 - the proposal would lead to an increase in access to jobs and opportunities for Black Country residents.

Proposals should also comply with the policies of the RSS Phase 2 revision.

Although it is likely there will be a need for a review by 2016, to examine the robustness of the Core Strategy policies for retailing and offices, proposals coming forward after 2016 will still be required to satisfy similar criteria to those above.

The RSS Revisions have not set out figures for particular kinds of leisure, entertainment and cultural development. However, the technical work for the RSS Phase 2 Revision points to particular needs for cinema provision in Walsall and West Bromwich. It is considered that a policy is required that will reflect these points and will support each centre in providing the widest possible range of leisure and similar facilities, with the proviso that there would not be an adverse impact on the strategy for each of the four centres to be able to provide a leisure offer commensurate with its catchment.

The four strategic centres will also be important in providing convenience shopping and local services for the local communities in surrounding areas, and increasingly within the centres themselves. This should be recognised in any policy, although quantifiable needs will have to be identified through future technical work when the scale and location of proposed housing development has been established.

Consultation Responses from Issues and Options Paper

Almost all respondents considered that the strategic centres should be developed / regenerated with investment in comparison shopping, leisure and culture and office employment, and that this should be planned and promoted to serve the needs of the Black Country's centres and catchments. Many recognised this approach as an important element of a long-term regeneration strategy for the whole of the Black Country.

The majority of respondents considered development should be managed to try to ensure that each of the strategic centres would get its share of development and none

would lose out to the others. Some of these suggested mechanisms to do this based on the phasing of development and on monitoring. On the other hand, a minority, felt to try to manage development would lead to investment being lost from the Black Country.

Interests linked to each of the strategic centres tended to support that centre. Thus, whilst Brierley Hill was felt to be able to attract development that might not otherwise come to the area, it was argued Wolverhampton is best-placed to be the 'city' for the Black Country. Conversely, respondents pointed to the need to improve Walsall and West Bromwich. All tended to agree that the strategic centres should be the locations for investment in entertainment. Residents' representations tended to express the view that the smaller centres should be regenerated, to at least the same extent as the larger centres.

Sustainability Appraisal

To be completed

Core Policy Area 29 – Recognising the Importance of the Smaller Town & Large District Centres –

We think the Core Strategy should contain a policy to recognise the importance of the smaller centres that are a distinctive and valued part of the Black Country's character. The network of such centres, 20 centres across the area, should help to meet needs in the most accessible and sustainable way.

Comparison Shopping

Due to recent retail trends, the comparison shopping roles of the smaller centres across the Black Country has declined over recent decades, and many of the centres do not offer the space for major development, or find it difficult to attract significant comparison retail investment. Nevertheless, the smaller town centres do play a localised comparison shopping role and there are some retailers (such as Wilkinsons and Ethel Austin) who do continue to trade and invest in smaller town centres. Whilst recognising the importance of the strategic centres, the RSS Phase 1 Revision took an approach that the present role of these centres should be maintained and that new development might be supported and on this basis proposed that 51,000 sq.m. gross of comparison floorspace might be distributed among the smaller town centres. If this is increased on the same basis as has been done for the strategic centres through the RSS Phase 2 Revision, then the requirement for comparison floorspace up to 2026 would be about 100,000 sq.m.

Convenience Shopping

The network of town centres across the Black Country also provides substantial opportunities for convenience shopping and each of the small town centres supports or is proposed to accommodate at least one large foodstore (either within or on the edge of the centre). In general it is considered at present there are only limited and particular needs for increased convenience shopping provision, but the Core Strategy's plans for housing growth could lead to a need for further convenience shopping in particular

centres. The scale and locations of housing growth are to be derived following this consultation.

Office Development

The RSS Phase 1 Revision provides for all of the office development, above 5000 sq.m. gross, required to serve the Black Country (apart from committed floorspace) to be accommodated in the strategic centres. On this basis it is considered that we need a policy that allows for office development to take place within the smaller town centres provided the total amount of office development in each centre would not exceed 5,000 sq.m. gross over the period of the plan. Levels of office development above this figure could not be justified in terms of the needs generated by the catchments of the non-strategic centres.

Leisure, Entertainment, Culture

As far as leisure, entertainment and culture are concerned, it is considered that the policy should take forward the recognition in the RSS Phase 1 Revision of the important role of Dudley town centre. It is important to recognise that other centres might have particular assets, such as live music in Bilston, or the library theatre at Bloxwich, or commitments, such as The Junction development at Oldbury. It will be appropriate to build upon these, provided there will not be an adverse impact on the strategy for the strategic centres to be the 'flagships' in terms of the provision of major facilities serving extensive catchment areas.

Consultation Responses from Issues and Options Paper

Responses from organisations and development interests focussed on the economic roles of the strategic centres but acknowledged the importance of the smaller town centres in terms of meeting local needs. Responses from local residents tended to go further and suggest that smaller centres were being forgotten when their expressed preferences were for them to be regenerated, although it was usually acknowledged such regeneration should be of an appropriate scale and kind for the centre and catchment concerned. There was general agreement that the smaller town centres were all in need of regeneration and many suggestions for improvements.

As far as comparison shopping is concerned, many respondents wished to see development managed so that the smaller town centres would get their 'share' of development. However, it was recognised that the smaller town centres would play more local roles and the emphasis was more on convenience shopping. Representations on behalf of large foodstore operators considered that the smaller towns might be appropriate locations to serve population growth with new stores in or on the edge of centres. However, there was some recognition of the amount of provision available and of the need to protect existing centres. Local residents on the other hand, were most keen to protect existing facilities and often expressed resistance to superstore development.

With so many centres across the Black Country representations on leisure, office and other uses tended to be either very general or highly specific. Responses tended either to refer to the need for the smaller town centres to be able to fulfill more rounded roles or make particular proposals for more development in individual centres, such as Oldbury and Stourbridge. However, several representations did refer to the RSS Phase 1 Revision proposals for the role for Dudley to be increasingly in respect of leisure and tourism.

Several representations referred to the need for particular centres to be better managed and 'cleaned up.'

Sustainability Appraisal

To be completed

Core Policy Area 30 – Controlling Out-of-Centre Developments

We believe there should be a core policy that will explain the approach to proposals for edge-of-centre and out-of-centre development in the context of the regeneration strategy for the Black Country.

Proposals for edge-of-centre and out-of-centre development for town centre uses are subject to tests set out in national policy in PPS6.

However, it is recognised there will be cases where it is not possible or desirable to accommodate retail, leisure, community or office uses in centres. The Core Strategy proposes to recognise there may be some local needs that should be or are best met at the local level. Otherwise, it may be possible to justify circumstances where developments might have to be or ought to be accepted in accessible out-of-centre locations. Examples might include where there is a clearly defined need for a particular type of retailing, or other activity, that even with considerable flexibility over the format of the development, cannot be accommodated within or on the edge of an existing centre at the appropriate level in the hierarchy, the provision of leisure, cultural or community uses that depend on a particular location or being combined with other uses to be practicable or viable, or major sports facilities that could not be fitted into any centre and which should be considered under the policies for sports rather than those for town centre uses.

Consultation Responses from Issues and Options Paper

The majority of representations supported development in the Black Country's centres to concentrate investment and regeneration, and to ensure facilities would be accessible. Several representations referred to the fragility of existing centres and the importance of protecting them against adverse impacts. Some representations stated that out-of-centre developments should be strictly controlled.

Where representations considered that developments might be allowed outside of existing centres they generally referred to national planning policy including to the fact that where there is a need that cannot be accommodated within an existing centre, edge-of-centre development is to be preferred to out-of-centre development.

There was only one representation that could be taken as supporting out-of-centre development for comparison shopping, whilst another referred to a requirement for a DIY store that might, or might not, be accommodated within or on the edge of an existing centre.

Some representations from the major foodstore operators expressed the view that in the absence of detailed analysis at present there should not be a presumption against development outside of existing centres.

There were two representations that office development should be allowed outside as well as within existing centres to try to maximise investment opportunities.

Representations on leisure, entertainment and culture gave strong support to investment in centres. There were, however, references to sport and community facilities that might be provided outside of existing centres.

Sustainability Appraisal

To be completed

- Possible overlap between policies

Core Policy Area 31 – Providing the Transport requirements to support the Strategy

The Core Strategy will support the delivery of an enhanced transport network for the Black Country. This is essential to support the scale of growth proposed for our Regeneration Corridors and Strategic Centres and create an effective transportation system to support sustainable communities. The key transport improvements to be considered will include:

- Proposals for passenger heavy rail development including the protection and enhancement of networks, the need for improvements to services and proposals for new stations.
- The role of a Metro network including
 - Wednesbury to Brierley Hill extension
 - 5Ws route linking Wolverhampton, Walsall and Wednesbury
 - Quinton Route along the Hagley Road Birmingham
 - Great Barr Route – linking Birmingham and Great Barr
- further mass rapid transit development both rail and bus-based.
- A framework for bus service and network improvements including the future of Bus Showcase, network changes and interchange needs.
- Proposals for Park and Ride including the location and suitability of any possible Strategic Sites, plus a framework for the establishment of more local facilities to support the long-term growth and prosperity of our Strategic Centres.
- Enhanced cycling and walking access to public transport networks.

We think we need a core policy that facilitates this programme.

Consultation responses from Issues and Options Paper

Most respondents stressed the importance of serving the four strategic centres by high quality transport networks. Emphasis was placed on the importance of Metro,

particularly for Brierley Hill, with possible expansion of the heavy rail network identified as a key opportunity for Walsall.

Buses were seen as providing the most coverage for public transport throughout the Black Country, playing a fundamental role in getting people to and from our key centres and development corridors.

Most responses on park and ride opposed large strategic facilities in the rural areas to the north and west of the conurbation. However, smaller facilities within the conurbation serving our local communities were seen as positive.

Policy Options Considered but Rejected

No policy options have been rejected

Sustainability Appraisal

The measures supported by this policy area including an improvement in rail passenger capacity, mass transit and bus services which will benefit accessibility, social inclusion, environmental quality, the public realm, cultural heritage and townscape quality.

There are concerns on the effects of park and ride which can encourage longer distance in commuting and has other sustainability implications. Park and ride facilities need to be located to minimise adverse environmental effects and should support end to end public transport use. This issue will be addressed at submission stage.

Core Policy Area 32 – Establishing Parking Standards

There is a need to establish criteria for Black Country parking standards that will support the proposed growth and prosperity agenda, whilst deterring town centre-type development in inappropriate inaccessible locations.

The policy will need to support the control and management of the growth proposed for our Key Centres, whilst picking up present and future parking needs for cycles, taxis, powered two wheelers and the disabled.

The policy will also need to look at the possibility of parking being used as a demand management tool to limit the impacts of congestion on our highway networks.

We think that a policy is needed to define criteria for sub regional parking standards. A balance will need to be found between the need to mitigate environmental damage caused by unrestrained traffic growth and the need to maintain vitality and viability of the centres.

Parking standards need to be developed within the context of current and known emerging national and regional policy guidance. Parking policy options need to be formulated for application across the area as a whole and in strategic centres with assessment of contribution to overarching Black Country Core Strategy objectives and specific objectives for transport. A preferred policy option will be identified.

Consultation responses from Issues and Options Paper

A representation pointed out the finite capacity of the motorway network and that it currently experiences severe congestion during busy times. A suggestion was put forward for the Core Strategy to deter development that is heavily car based from close to motorway junctions to prevent gridlock holding back the longer term growth of the area.

Parking levels and controls were also identified as a means of deterring car based travel into congested areas. However, some areas such as Walsall town centre were identified as being lacking in suitable car parking provision.

Policy Options Considered , but Rejected

No policy options have been rejected

Sustainability Appraisal

The policy area will support efforts to reduce congestion as it recognises the the impact car parking provision for new development has on traffic growth.

Core Policy Area 33 – Improving the Highway Network

The capacity of the highway network will need to be expanded and managed in order to support the growth and long term viability of our employment areas. This framework will need to include:

- The location of new or increased highway capacity that improves access to our key employment areas, including tackling key bottlenecks.
- Establishes a framework for improving the management of the network to maximise the efficiency of what we already have.
- Supports the Highways Agency's proposals for enhancements to the strategic motorway network that serves the Black Country, including the introduction of Active Traffic Management (ATM)

We think we need a core policy that facilitates this programme

Is this limited to serving key employment areas, are there any other priority locations?

Consultation responses from Issues and Options Paper

Many respondents called for improvements to the highway network, particularly those routes supporting our key centres and employment areas. However, a large number were concerned that highway capacity increases would attract more traffic, create congestion and make walking, cycling and the use of public transport less attractive.

Emphasis was placed in a number of responses to the need for good quality highway routes serving our current and proposed industrial sites. Improvements to Pensnett

were specifically identified in a number of responses. However, there were also responses to suggest that Pensnett employment area could not be adequately served by good quality roads. The majority of responses that made reference to the Western Orbital were opposed to the proposal. However, a number of responses promoted the development of such a route.

Policy Options Considered and Rejected

No policy options have been rejected

Sustainability Appraisal

Highway improvements are seen as reducing traffic congestion locally and in the short term but stimulating traffic growth generally and in the longer term. Traffic growth will bring adverse effects on air quality, noise greenhouse gas emissions and reduce safety for cyclists and pedestrians..

New highway improvements can have adverse effects on the environment, landscape and biodiversity. Encouraging car use undermines existing and proposed public transport networks. Highway improvements should assist buses and incorporate provision for walking and cycling to help reduce the need for car travel. Low noise surfacing and appropriate design and landscaping should be utilised to reduce the adverse social and environmental effects. The negative impact of road construction will be addressed at submission stage

Core Policy Area 34 – Support the effective movement of Freight

The Core Strategy will facilitate the effective movement of freight on our transport networks to feed our Centres and Employment Areas will continue to be important to support the Black Country economy. In addition to the improvements proposed in Policy CPA31, this programme will include:

- Any specific highway improvements needed to improve freight access to our Centres and Key Employment Areas.
- Identification of possible opportunities to move more freight on the rail and canal networks, including preferred routes and safeguarding land needed for interchange between modes.
- Outlines the criteria for improved freight parking provision and the ability of freight to access and serve our Key Centres.

We think we need a core policy which facilitates this programme.

Consultation responses from Issues and Options Paper

Several respondents called for greater use of railways for freight . Some respondents also wished to see greater use of the Black Countries canals for freight. Emphasis was placed in a number of responses to the need for good quality highway routes serving our current and proposed key employment sites. Improvements to Pensnett were specifically identified in a number of responses. However, there were also responses to

suggest that Pensnett employment area could not be adequately served by good quality roads.

Policy Options Considered and Rejected

No policy options have been rejected

Sustainability Appraisal

Removal of freight from the road to rail or canal will reduce congestion, support investment and the economy of the Black Country. Any reduction in road freight traffic improves environmental quality air quality reduces noise and supports townscape and the public realm. It will also help reduce greenhouse gas emissions.

Potential sustainability issues arrive from freight orientated highway improvements, which may have direct localised adverse effects. These issues will be addressed at submission stage.

Core Policy Area 35 – Providing for Economic Growth

The Core Strategy will support the transformation and diversification of the Black Country economy. We will seek to attract high quality industry in growing economic sectors whilst ensuring that there is a continuing place for existing industry that supports the livelihoods of Black Country residents.

We think we need a Core Strategy Policy that will set the minimum quantity of high quality employment land over the Core Strategy period required to meet likely employment needs and lead the transformation of the Black Country manufacturing economy, whilst also providing enough land to deal with the growing logistics sector, some of which will also consist of high quality development.

We have commissioned consultants GVA Grimley and GHK to update the Employment Land Capacity Study undertaken as part of the Black Country Study in 2003. This update identifies the need for a minimum of between 1200 and 1400ha of high quality operational employment land in the Black Country at 2026 to meet anticipated employment needs. The majority of this land is required for manufacturing and logistics activity, as set out below:

Table [*] – Employment Land requirement 2011-26

Use Class	2011 (ha)	2016 (ha)	2021 (ha)	2026 (ha)
B1(b/c) / B2 – define	750-880	622-729	522-612	442-518
B8 – define	552-646	564-661	572-671	583-682
Total	1305-1529	1186-1390	1094-1282	1024-1200

The total employment land requirement set out in this Policy should also reflect the approach set out in the emerging RSS Phase 2 Revision relating to the provision of a minimum reservoir of available new and redeveloped employment land. It includes waste storage and processing activities but not household waste recycling which tends

to take place on industrial land. Also it does not allow for the relocation process which can generate a need for additional land. However, the RSS Phase 2 Revision Preferred Option establishes a minimum rolling five year reservoir. This will ensure that there is enough land to deal with additional requirements. The reservoir envisaged as 85ha of land for the Black Country, and a target of 555ha to 2026

Question – do you agree that this employment land requirement will provide sufficient land to meet the economic diversification and transformation needs of the Black Country?

Consultation responses from Issues and Options paper

No major criticisms have been made to the level of employment land requirement set out in the Issues and Options Paper. There is general acceptance of the need to provide a much greater quantum of high quality employment land than currently exists in the Black Country. In terms of local employment land, while it is accepted that some of this will need to be redeveloped to accommodate housing requirements, the mechanism to manage this transfer was raised as a key issue

Sustainability Appraisal

This Policy Area seeks to encourage the diversification of the sub-regional economy and is considered to be sound in sustainability terms. By both aiming to protect current industry and supporting the transformation of the Black Country manufacturing economy, it will help provide expanded employment opportunities for residents, and help to encourage the growth of skills in the sub region.

Policy Options Considered but rejected

There are no alternative options to this approach

Core Policy Area 36 – Provision of High Quality Employment Land

There will be a major improvement in the provision of High Quality employment land in the Black Country to support the transformation and diversification of the regional economy. Improvements and modernisation initiatives will be focussed on High Quality employment areas to ensure that the Black Country has a sufficient stock of land and premises capable of meeting the needs of modern business.

We think we need a Policy which establishes the characteristics and location of High Quality Employment Land and confirms that these areas will be the focus for industrial and logistics development over the Core Strategy period. The broad locations of High Quality Employment Areas is shown on the Key Diagram and Corridors Plans. Detailed boundaries of High Quality Employment Areas will be confirmed in Area Action Plans, Allocations Development Plan Documents and Proposals Maps.

At this stage, we think the key characteristics of High Quality Employment Areas are:

- Good accessibility to international, national and regional markets and supply chains. We think that more than 5-10 minutes off peak drive time of the national motorway network is essential in meeting this criteria.

- A critical mass of active industrial and logistics land and premises that are well suited to the needs of modern industry
- Proximity to existing or proposed knowledge cluster
- High existing or potential environmental quality including high quality greenspace, good quality built environment and linkages to walking and cycling routes.
- Capable of attracting national or international investment

We think that High Quality Employment Areas should be protected for B1(b), B1(c), B2 and B8 uses in the long term. We think that in order to safeguard a sufficient supply of employment land, it is appropriate to prohibit change to other uses, such as B1 offices, which are town centre uses, and housing, on the basis that housing need can be satisfied elsewhere in the Black Country.

An employment land 'reservoir' will be maintained in order to ensure that there is enough land in the development pipeline at any one time and also to cater to firms relocation requirements.

We have used the key characteristics listed above to inform the Employment Land Capacity Study Update. The Update establishes the quantity and broad location of existing and potential High Quality Employment Land that will be capable of meeting the employment land requirements set out in Table 1. The location of the High Quality Employment Areas is shown on the Key Diagram and Regeneration Corridor maps. In most cases, these areas meet all of the criteria set out above. However, in some instances, while areas do not meet all of the criteria, they perform so strongly against all others that they are capable of attracting high quality employment investment.

The Employment Land Capacity Study Update identifies 1 622ha of land within or on the edge of the Black Country that is capable of meeting High Quality Employment Land requirements to 2026. However, of this, only 617ha is currently considered to be High Quality. A combination of new infrastructure, redevelopment and environmental improvement will be required to transform the majority of the existing employment land stock. See the delivery policy.

[Look at these questions – do you agree?](#)

Question – do you agree with the characteristics of high quality employment areas, and the proposed distribution of high quality employment land as shown on the Key Diagram and Regeneration Corridor Maps?

Question – do you agree that high quality employment areas should be protected for industrial and logistics activity?

Question – do you think we should safeguard land and premises within High Quality Employment Areas for High Quality activity, and what are the characteristics of such investment?

Consultation responses from Issues and Options Paper

There was general support for the criteria used in the Black Country Employment Land Capacity Study as set out in the Issues and Options Paper. In terms of specific criteria, and in order of stated importance, the key criteria are access to the motorway / strategic highway network, high quality environment, proximity to a skilled labour force / high

quality residential areas, separation from residential areas and the availability of large sites with large plots to facilitate expansion.

Sustainability Appraisal

Locating High Quality Employment Areas in more accessible locations, including to the national motorway network, will help to reduce the impact of freight on other areas of the Black Country. However, greater consideration should be given to supporting the development of High Quality Employment Areas near rail freight / freight transfer terminals. In addition, clearer links should be made to locations amenable to public transport routes.

Policy Options Considered but rejected

There are no alternative options to this approach

Core Policy Area 37 – Providing and Safeguarding Local Employment Land – [reorder to explain what they are?](#)

The Core Strategy will identify an adequate supply of land to meet the needs of 'local' employment activity.

We think we need a Core Strategy Policy to cover the provision and safeguarding of employment land outside the High Quality Employment Areas. It will establish the characteristics of retained local employment land. The detailed boundaries of High Quality Employment Areas will be confirmed in Area Action Plans, Allocations Development Plan Documents and Proposals Maps. At this stage, we think areas that have the following characteristics should be safeguarded for 'local' employment activity:

- A critical mass of active industrial and service uses and premises that are fit for purpose
- Good access to local markets, suppliers and employees
- Physically separated from sensitive uses, such as housing and schools
- Capable of attracting local investment

We also need to establish what kinds of uses should be prioritised for these areas instead of High Quality Employment Areas. At this stage we think the main uses for these areas should be:

- Local industrial and logistics activity
- Motortrade, including car showrooms, garages and vehicle repair
- Haulage and transfer depots
- Trade wholesale retailing and builders merchants
- Scrap metal, timber, construction premises and yards
- Waste collection and transfer / recycling uses

Refer to conditions

It is essential to retain a supply of land and premises for those types of industrial, logistics and commercial activity that do not require High Quality locations.

We have used these criteria to identify a series of 'local' employment areas on the Key Diagram and Regeneration Corridor Maps.

Question – Do the criteria listed above provide enough guidance to determine which areas should be safeguarded for those uses which may not be appropriate in High Quality Employment Areas.

Question – Should we allow the uses listed in this Policy Area in Local Employment Areas only, or should a more flexible approach be promoted?

Consultation responses from Issues and Options Paper

A number of comments were made suggesting that the Issues and Options Paper does not set out how the release of surplus employment land will be managed. Think this is a different issue from local retained land – needs a separate policy

Sustainability Appraisal

By safeguarding local employment land, this Policy is considered sound in sustainability terms. It supports local jobs and services, ensuring that such areas are close to the markets, suppliers and employees, limiting the impact of such uses on housing areas and the provision of premises which are fit for purpose.

Policy Options Considered but rejected

There are no alternative options to this approach

Core Policy Area 38 : Providing for Offices and Services

Office and service sector development will be directed to main centres.

We think we need a Policy which identifies the preferred locations for office and service sector development. This Policy should confirm that offices are a town centre use and subject to PPS6 and RSS policies. Policy Area [**] confirms that the Core Strategy provides sufficient land in or on the edge of main centres to deal with office requirements as set out in RSS figures. Outside of these locations, we think that new offices and service development will also be allowed where:

- A) it is ancillary to industrial or logistics activity within Use Class B1(b)/(c), B2 and B8 development;
- B) or it is for the in-situ expansion of existing office premises where it can be demonstrated that the expansion is integral to the existing operation and there are no alternative sites or premises available in centres, or that separating the operation would prejudice its future
- C) link to policy 35 and refer to use of conditions eg no trade to general public etc

Consultation responses from Issues and Options Paper

The majority of representations supported development in the Black Country's centres to concentrate investment and regeneration, and to ensure facilities would be accessible. Several representations referred to the fragility of existing centres and the importance of protecting them against adverse impacts. Some representations stated that out-of-centre developments should be strictly controlled. There were two representations that office development should be allowed outside as well as within existing centres to try to maximise investment opportunities.

Sustainability appraisal

This Policy Area is considered sound in sustainability terms. By aiming to ensure that there is sufficient land in or on the edge of main centres for office development, and outlining a presumption against such development on out of centre or industrial land, the Policy Area will support sustainable transport use, facilitate modal shift, reduce energy use and greenhouse gas emissions from transport and support accessibility. The Policy area will also help to improve the vitality and vibrancy of centres by supporting investment, encouraging the growth of town and city centre economies and supporting job growth. There are however potential issues related to the historic environment. To address this, the Policy Area should support new office development incorporating design which complements and enhances individual heritage assets and encourages development which is a form and scale appropriate to the intimate qualities of the centres.

Policy Options Considered but rejected

There are no alternative options to this approach

Core Policy Area 39 – Accommodating Bad Neighbour Uses

The Core Strategy will identify the types of locations appropriate for 'bad neighbour' uses..

We think we need a Policy which identifies the best locations for 'bad neighbour' uses, such as scrap metal dealers, car breakers, open salvage activities, some waste management facilities, but not landfill sites. We do not think that these should be located in high quality employment areas. Nor should they be located in any employment area that is close to schools, housing areas. Such uses must not be sited in prominent and visually sensitive locations.

Consultation responses from Issues and Options Paper

Refer to waste policies.

Sustainability appraisal

This Policy area is considered sound in sustainability terms.

Core Policy Area 40 – Clustering of High Technology Businesses

The Core Strategy will support the clustering of High Technology Businesses around associated research hubs.

We think we need a Policy which facilitates clustering by targeting innovative new and expanding businesses to particular areas, such as close to University facilities and hospitals, or encouraged to locate in reasonable proximity to enable complementary working benefits. This approach is subject to the need to ensure that town centre uses eg shops offices and public services will be directed to town centres

We also think the Core Strategy should promote Local Clustering by promoting improved management in industrial areas to facilitate infrastructure & environmental improvements, shared parking facilities, use of spare capacity (eg shared deliveries)

Question – do you think that the Core Strategy should target particular corridors for specific clusters, for example the aerospace cluster in Corridor 1? Or should a more flexible approach be promoted which explains that the preferred location for cluster development is within the Regeneration Corridors but other locations will be considered?

Consultation responses from Issues and Options Paper

There was a mixed response to this question. While there was general support for the principle of attracting clusters of high technology business, there was less consensus on the appropriate mechanism, with a number of responses suggesting that a flexible approach would be appropriate. In terms of locations, responses highlighted the need for good access, an attractive environment, proximity to knowledge intensive nodes, and locations within centres.

Sustainability Appraisal

This Policy area is considered sound in sustainability terms. Supporting the clustering of High Technology Businesses, and encouraging their locations near hospitals and universities will support a reduction in the need to travel. The Sustainability appraisal has highlighted the need for the Policy area should also aim to support the development of these clusters in places accessible by public transport and walking and cycling networks. Supporting this, the Policy area should also aim to improve walking and cycling linkages between these interdependent uses (such as universities and hospitals).

Policy Options Considered but rejected

There are no alternative options to this approach

Core Policy Area 41 – Improving access to the labour market

The Core Strategy will seek to increase social cohesion by enhancing opportunities for people to succeed in the labour market.

We think we need a Core Strategy policy to ensure that, where appropriate, major employment development to provide measures to promote access to the jobs it creates amongst those residents of the Black Country who have difficulty entering the labour market. At the same time, we need to make sure that this Policy does not incur additional costs on development that will deter future investment in the Black Country.

In attracting new employers to the Black Country, it is recognised that people commuting from the rest of the Region will take up some of the new jobs. It is important however, that the jobs created in the new and existing sectors of the economy are made available to existing residents.

The policy will establish whether the company or organisation provides training opportunities in house. Where there are no in-house training facilities, day release courses or local recruitment policies, a contribution may be liable towards training and skills improvement. The policy will not come into effect until those bodies that provide skills and educational training are able to demonstrate that their course and programmes will directly benefit the companies concerned, in order to ensure that any funds gained from the operation of the policy are not wasted.

Consultation responses from Issues and Options paper

Consultee responses highlighted the need for the Core strategy to address education and skills levels within the community to provide local jobs for local people.

Sustainability Appraisal

This Policy is considered sound in sustainability terms. As well as encouraging an improvement in skills through training opportunities, the Policy area should reiterate that employment land should be located in areas accessible by walking and public transport. This is important as accessibility is a major barrier for some for capitalizing on job opportunities.

Policy Options Considered but rejected

There are no alternative options to this approach

Policy Options considered but rejected

Separate Reservation of employment land for manufacturing and logistics activity

The consultation responses to the Issues and Options Paper emphasised the need for the Core Strategy to promote flexibility between B2 and B8 development on employment land. It is considered that site owners and occupiers need to accommodate both manufacturing and logistics uses within the same site, and an approach which prioritises manufacturing over logistics may deter investment and result in sites remaining undeveloped. However, in some circumstances, Area Action Plans

and Allocation DPDs can identify specific sites to promote cluster development or other high technology uses where appropriate.

Core Policy Area 40 – Addressing the Black Country’s Waste and Resource Management Requirements

The Core Strategy will support the waste management industry as an integral and desirable sector of the sustainable economy of the Black Country.

We think we need a Core Policy Area which recognises waste management as efficient resource management, which has the potential to bring a range of technical and traditional employment types. However, in advocating our positive view of the resource management industry we should make it clear that we will not lower our environmental standards. We should expect the highest environmental and design standards and where appropriate we expect leading technological processes to be deployed and developed.

The Policy Area will address current national, regional and local requirements, including national targets for MSW recovery (what is this?) and diversion away from landfill, and regional apportionments in the emerging RSS Phase 2 Revision (the need for major ‘strategic’ facilities), CD&EW (define) facilities and facilities to store, treat and remediate contaminated soils..

This Policy area will provide a summary of evidence re: existing waste management capacity (including landfill capacity), existing arisings, projected annual arisings to 2026, and quantify the “capacity gap” – the shortfall in waste/ resource recovery, transfer and disposal capacity that needs to be provided between now and 2026 to comply with regional apportionments and other requirements.

In some cases, specific waste/ resource management needs will have to be met outside the Black Country, policy needs to explain what these are, how and where these wastes will be managed, and why they are not being managed locally.

Consultation responses from Issues and Options Paper¹⁰

There was general consensus among stakeholders is that the Black Country should seek to manage as much waste as possible within the area, and should plan for managing an amount of waste equivalent to that arising within its own area, in line with emerging RSS Phase 2 Revision. Stakeholders agree that the Core Strategy should aim to meet national targets for recycling and recovery.

There is general consensus that waste should be managed more sustainably and moved up the “waste hierarchy,” with more emphasis on waste reduction, re-use, recycling and recovery and less reliance on landfill.

¹⁰ This should reflect comments received through other “frontloading” engagement as well as Issues and Options consultation.

Stakeholders support better co-ordination/ unified approach towards management across the four Boroughs, and partnership working with adjoining authorities, commercial operators, industry and voluntary organisations regarding waste minimisation and recycling initiatives and promotion/ publicity.

There is significant support for use of waste to generate energy/ combined heat and power, and for facilities to be incorporated into regeneration projects. Technologies suggested as being suitable include: recovery of biogas from food and garden waste through anaerobic digestion, use of waste wood for fuel (biomass) and remanufacturing of waste oil into biodiesel. However, mass burn incineration is not supported.

Negative perception of waste management is acknowledged as a significant barrier to bringing forward new proposals. However, there is a feeling that local communities should accept responsibility for managing the waste they generate, and should recognise the importance of sustainable waste management to society and the local economy.

Some stakeholders consider the Black Country needs a large increase in the number of composting, recycling and transfer facilities. Significant numbers of local residents have supported recycling and composting of household waste and want to see expansion of existing services/ a wider range of materials recycled.

The needs of small businesses should be considered in planning for future waste management infrastructure. It is felt that improving and expanding the infrastructure available will benefit the Black Country's economy by reducing businesses' waste management costs and helping them to cope with the impact of the Landfill Tax.

There are currently very few facilities processing CD&EW/ secondary and recycled aggregates in the Black Country and no facilities for washing and processing of contaminated soils – regeneration and transformation of the Black Country will depend on availability of such facilities.

Environmental quality is an important issue for the Black Country – as a general principle, stakeholders feel that management of waste should minimise impacts on the environment and local communities and should avoid areas that are important for biodiversity/ geodiversity.

Source: Source: Initial consultation December 2006 – April 2007; Minerals & Waste Stakeholder Event Workshops 29/3/07 (see Event Report); Issues and Options Consultation June – August 2007.

Sustainability Appraisal

We have no realistic option other than to address national and regional policy requirements and to seek to manage an amount of waste equivalent to what arises in the area, and address key gaps in provision. The option of managing significantly more waste than arises locally has been rejected by stakeholders (see below). We now need to further refine and identify “options” relating to the following outstanding issues: -

- Addressing “capacity gaps” in relation to RSS Policy W2 MSW and C & I waste apportionments¹¹ – options re: how, where and when unmet capacity should be

¹¹ Sub-dividing the MSW and C & I apportionments by authority is a technical exercise which we will need to ask WMRTAB to help with, once we have agreed housing requirements for each authority, rather than

provided (including locations outside the Black Country, phasing of facilities needed in the future to support housing and employment growth proposals, to what extent we should identify specific locations to meet these needs/ identify a range of locations that could accommodate future proposals we cannot identify now).

- To what extent should the Black Country contribute to meeting RSS Policy W3 requirement to address “treatment gaps” by identifying locations suitable for facilities of sub-regional or regional significance?¹² – would identifying Hill Top/ other potential “cluster” locations satisfy this requirement, and are there any other options we need to consider?
- Addressing RSS Policy W10 requirement to “give specific priority” to identifying new sites in the Black Country to store, treat and remediate contaminated soils – options re: suitable locations/ whether or not the Black Country can accommodate the full range of facilities needed.

Policy Options Considered but Rejected

Options relating to this topic were considered by stakeholders at the Minerals & Waste Stakeholder Workshop on 29 March 2007, as follows:

- Option W1A: Manage the amount of waste that arises in the Black Country
- Option W1B: Manage more waste than arises in the Black Country
- Option W1C: Focus on waste management gaps and build on strengths

Option W1B was rejected by stakeholders. It was not considered acceptable to local communities to encourage large-scale importation of waste into the Black Country from elsewhere. Large-scale importation of waste was also considered to be unsustainable. In reality, we have no option but to pursue a combination of Options W1A and W1C. Further development of options relating to addressing specific RSS requirements is discussed above (see Sustainability Appraisal).

Core Policy Area 41 – Resource Recovery Operations and Ancillary Infrastructure.

The Core Strategy will direct resource recovery operations in locations where there is a potential to develop a synergy with other commercial and community developments. We would expect a high quality of design and appropriate respect to the scale for the development of these facilities.

We need to identify certain strategic locations for these facilities which fulfil a regional function but this should not preclude any other locations if the scale and design are appropriate and a synergy can be demonstrated.

an exercise in considering “options.” Once this is done we need to work out what the “capacity gaps” are in terms of tonnages/ local needs.

¹² Draft RSS Policy W3 identifies a number of WPAs where a “treatment gap” exists, but none of the Black Country authorities is included. However, it identifies a number of settlements that are considered “well placed” to accommodate such facilities, including Dudley, Sandwell, Solihull; Walsall and Wolverhampton.

This Policy Area is related to the types of operation described in Annex IIB of the current Waste Directive/ Article 3 & Annex II of the proposed revisions to the Directive. The current Annex IIB includes recycling, recovery and reclamation of various materials from waste. Ancillary facilities such as sorting, bulking and transfer facilities and HRCs would also fall into the “recovery” category, provided that the bulk of the waste handled is to be transferred elsewhere for “recovery” rather than “disposal.” Ancillary facilities such as sorting, bulking and transfer facilities and HRCs also fall into the “recovery” category provided that the bulk of the waste is to be transferred elsewhere for “recovery” rather than “disposal”

The Core Strategy needs to identify locations for specific proposals aimed at meeting particular regional, sub-regional and local requirements – e.g. “cluster” developments, MSW infrastructure, CD&EW/ contaminated soil processing facilities, energy from waste plants proposed as part of regeneration projects. Proposals for each location should specify the waste management requirements in each case, and any issues that need to be addressed, e.g. site constraints, ground conditions, access/ highway issues, environmental/ amenity issues, or other potential risks or threats.¹³

We will also need to identify broad locations/ types of locations within the Black Country that are suitable for the development of unidentified (“windfall”) commercially-driven resource recovery facilities / ancillary infrastructure, which are likely to come forward between now and 2026. this will require a range of different locations across the Black Country suitable for different types of operation. This approach will specify the types of uses acceptable in each broad location/ type of location – for example, operations handling hazardous wastes or which are likely to be noisy, dusty or generate significant amounts of road traffic should be located away from “sensitive” uses (need to define, e.g. residential areas, high quality employment areas) and areas where “sensitive” uses are proposed.

The Core Strategy also needs to address issue of encroachment of “sensitive” uses into locations identified for waste and resource recovery operations, e.g. definition of “sensitive” uses, minimum “buffer” or distance separation needed.

There is general agreement that waste should be managed as close as possible to its source to minimise the distance waste has to be transported. Stakeholders have confirmed that waste management facilities need to be centrally located/ in accessible locations, preferably adjacent to main roads and the rail or canal network. Facilities likely to generate a significant amount of traffic should be located away from residential areas or high quality employment locations, as this is one of the main sources of conflict/ public objection.

Although the principle of transporting waste by rail or canal is supported by many stakeholders, others consider that in most cases it is unlikely to be feasible or economically viable.

Stakeholders have indicated a need for a number/ “hierarchy” of sites across the Black Country with one main site in each Borough and local sites for re-use, repair and transfer/ batching of materials closer to source.

Local residents feel there is a need for more household recycling centres (HRCs) across the Black Country. Mucklow Hill (Dudley) has been suggested as a suitable location for a new facility to replace Shidas Lane and Stourbridge HRCs. Residents feel they should be able to use facilities in an adjacent Borough if it is nearer, and are also concerned about the consequences of not having enough places locally where people can take waste, e.g. litter, fly-tipping.

There is support for co-location of MSW and C & I waste facilities for greater efficiency/ to reduce unit costs. There is also a view that the separation of the two waste streams is preventing some technologies (e.g. processing of food waste into biogas) from taking off due to economies of scale.

Several commercial operators have said they do not want the Core Strategy to specify locations for waste management but would prefer maximum flexibility e.g. identification of broad areas or types of location considered suitable. However, recent GO-WM and Ministerial advice suggests that where a particular need has been identified, Core Strategies will be expected to identify specific locations or potential locations for the facilities needed.

There is support for the Black Country becoming a “centre of excellence” for reprocessing and resource management and for the identification of several strategic locations for resource recovery parks across the Black Country. AWM supports developing “economic cluster” approach in line with RES priorities.

There is strong support for the development of a resource recovery park at Hill Top in Sandwell. Other locations put forward as being suitable for major waste management developments are: Aldridge (Walsall), land adjacent to former Edwin Richards Quarry (Sandwell), Tipton or Coseley (Sandwell/ Dudley), and “south” Black Country (presumably Halesowen or Stourbridge, Dudley). Expansion of Foxyards Site, Tipton (Dudley), and re-use of existing sites including Lister Road (Dudley) have also been suggested.

There is support for incorporating sustainable waste management facilities into regeneration projects, for example, recycling facilities and energy from waste/ combined heat and power plants.

Stakeholders generally agree that employment sites are suitable for many types of waste management activity and provide opportunities to link facilities to source of waste. There is acceptance of the need to retain sufficient employment land of all types in appropriate locations to accommodate waste management activities. However, one stakeholder has cautioned that waste management should not impact on the attractiveness and viability of employment sites.

The Environment Agency has noted that not all waste management facilities can be accommodated within general industrial areas and that some require special locations.

Many stakeholders feel that sites of importance for biodiversity/ geodiversity, parks, open spaces and Green Belt/ open countryside should not be used for waste

management. However, some have suggested that allotments may be suitable for small-scale composting schemes.

It is acknowledged that composting of green waste might have to take place on open land in the Green Belt or outside the Black Country. Environment Agency has highlighted its policy of not permitting open windrow composting within 250m of a residential area.

So far, no operator has expressed any interest in developing a facility in the Black Country to store, treat or remediate contaminated soils. One stakeholder has expressed doubt that suitable locations can be found within the Black Country for the bio-remediation of contaminated soils.

Concerns have been expressed about the potential impacts of waste management facilities on the environment and local communities. Stakeholders feel that such impacts should be minimised, for example through landscaping and screening.

Some stakeholders have highlighted the need for waste management activities to be strictly controlled. However, this is addressed through licensing and regulation regimes and is therefore outside the scope of the Core Strategy.

Source: Source: Initial consultation December 2006 – April 2007; Minerals & Waste Stakeholder Event Workshops 29/3/07 (see Event Report); Issues and Options Consultation June – August 2007.

Sustainability Appraisal

We need to identify “options” relating to the following:

- The extent to which we should identify specific locations for waste and resource management activities, and the extent to which we can rely on the market to provide facilities in appropriate areas through “windfalls.”
- The allowances to be made for waste and resource recovery with high quality and local employment areas i.e. how much of each type of land should we allow and to what extent should we “over provide” to take account of losses to other employment uses?
- Alternative locations for the key facilities needed including those put forward by stakeholders through the recent consultation (see above summary) and any others identified by the authorities and the WDAs.

SA/ SEA will need to appraise any options identified, and will also need to consider the impact of each of the Spatial Options on any waste and resource recovery locations under consideration.

Policy Options Considered but Rejected

Options relating to the location of waste management facilities were considered by stakeholders at the Minerals & Waste Stakeholder Workshop on 29 March 2007, as follows:

- Option W3A – Waste infrastructure to be developed in a limited number of key strategic locations
- Option W3B – Development of waste management infrastructure to take place in any appropriate location within the Growth Corridors, subject to compliance with criteria-based policy.

Stakeholders appeared to reject Option W3A on the grounds that it was too restrictive and inflexible. It was also felt that it would not provide the full range of sites and opportunities needed unless several strategic locations were identified, and that it might encourage significant amounts of waste to be imported into the area.

Core Policy Area 42 – Landfill

The Core Strategy will recognise that although landfilling is a last resort, it has a role and therefore needs to be catered for as there will always be residual waste which will need to be disposed. The policy will need to recognise that landfilling operations can have beneficial effects in appropriate restoration of mineral workings.

The policy will need to ensure that development onto landfill sites is safe and any landfill gas is used to generate energy and is not vented into the atmosphere where it can add to global warming.

There is also need to ensure that there is sufficient capacity over the plan period to provide for final disposal.

The Core Strategy will support the use of landfill to restore former mineral workings where appropriate – with cross-reference to **Mineral Core Policy** addressing restoration issues affecting potential future voids and/ or particular areas, such as constraints which may restrict the materials that can be used in restoration/ landfilling.

It will be necessary to identify proposed landfill sites and existing mineral working sites that will require restoration by landfill between now and 2026 (i.e. quarries that will close or reach the end of a major working phase within the lifetime of the plan). We will also identify landfill sites and former landfill sites considered to have potential to generate energy from landfill gas, and should explain circumstances where systems will be required to be installed.

The Core Strategy will identify locations suitable for development of long-term storage of waste and waste transfer operations handling waste destined for further treatment / disposal – where possible the latter should be linked to railheads, wharves and the trunk road network. Where locations are subject to significant issues or constraints that developers will be expected to address, e.g. site capacity issues, traffic congestion or amenity issues, these should be identified. The Core Strategy will address what happens if alternative uses are proposed in locations identified for specific waste and resource recovery operations, e.g. circumstances where alternative uses will or will not be permitted and mitigation required for loss of site to a different use. The Core Strategy also needs to consider the issue of encroachment of “sensitive” uses into

locations identified for waste and resource recovery operations, e.g. definition of “sensitive” uses, minimum “buffer” or distance separation needed – this should be consistent with requirements set out in

Consultation responses from Issues and Options Paper¹⁴

Most stakeholders who have responded have accepted that there will always be a need for some landfill sites, but should be regarded as a “last resort.” Some have noted that landfilling is often the only viable means of restoring deep mineral workings to a safe and beneficial use.

The Environment Agency has noted discrepancies between the landfill void figures quoted in the Waste Background Paper and their 2004 survey of landfill void space. The data needs to be checked and the reason for the discrepancy explained.

There is recognition that waste disposal operations are normally likely to have greater impacts on the environment/ local communities and businesses than other types of waste management activity.

There is support for capturing landfill gas for energy.

Natural England, BCGP and others have expressed the view that landfill/ mineral restoration schemes should maximise opportunities for biodiversity and geodiversity and this should be built into schemes at the earliest stage. Areas highlighted as being important include Rowley Hills and Stonnall/ Aldridge.

The Environment Agency has noted that it has locational guidance for landfilling within groundwater protection areas (RGN3), and that it will not issue an IPPC permit for landfilling where this would be contrary to its guidance.

One stakeholder considers there is a need for hazardous waste disposal sites in the Black Country. Concerns have been expressed about landfilling with toxic wastes/ biodegradable wastes, safety and the need for strict environmental controls. However, these are largely matters relating to the licensing and management of sites, and therefore outside the scope of the Core Strategy.

Source: Source: Initial consultation December 2006 – April 2007; Minerals & Waste Stakeholder Event Workshops 29/3/07 (see Event Report); Issues and Options Consultation June – August 2007.

Sustainability Appraisal

The location of large-scale, commercial landfill sites is constrained by the availability of suitable voids, which in most cases will be voids left over from previous mining and quarrying activities. Where there are issues relating to the feasibility of restoring voids/ preferred methods of restoration and after-uses, these really need to be addressed in the relevant **Minerals Core Policy** rather than in the waste policy, as it is at this stage that restoration requirements are established.

The main “options” that will need to be considered and possibly appraised in relation to the waste disposal policy relate to the identification of potential locations for ancillary

waste disposal operations such as locations for long-term storage of waste or waste transfer operations that are mostly handling wastes whose fate is treatment/ disposal rather than recovery. However, no such locations have been identified so far.

Policy Options Considered but Rejected

No options have been considered in relation to waste disposal. Although it is the “last resort,” PPS10 acknowledges that it must be catered for. There are few options with regard to where waste disposal facilities can be located, other than in the case of locations for long-term storage or for transfer of waste pending disposal.

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