

Black Country | **Core Strategy**

Planning for the future of the Black Country

Black Country Core Strategy Issues and Options Consultation

Summary and Initial Commentary

**Dudley**
Metropolitan Borough Council

 **Sandwell**
Metropolitan Borough Council



Walsall Council

**CITY OF
WOLVERHAMPTON
COUNCIL**

Black Country - See it in colour



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1 Introduction and Background

1.1 Background to the Consultation

This document sets out the consultation process both internally and externally involved in the production of the Black Country Core Strategy Review Issues and Options stage. The Issues and Options Consultation took place between 3rd July and 8th September 2017. This report provides background to the consultation and approach, the level of engagement from stakeholders along with a summary of the main themes raised during the consultation. It finishes with a review of the consultation and an initial commentary on the issues raised and how they will be addressed during the future stages of the development of the Core Strategy Review.

The current Core Strategy was adopted in February 2011 and covers the period 2006-2026. The Black Country Core Strategy (BBCS) included a clear commitment to reviewing the Core Strategy five years after adoption, to ensure the spatial objectives and strategy are being effectively delivered and to keep the plan up-to-date. This is in line with national planning guidance, which states that “most Local Plans are likely to require updating in whole or in part at least every five years”. Rolling the plan forward will also enable longer term needs to be addressed. The need for a review has been given greater urgency by new challenges which have emerged since 2011. There have been significant changes in national policy and a housing shortfall was identified in Birmingham which neighbouring authorities have a duty to consider accommodating.

The National Planning Policy Framework (NPPF) requires a clear justification for not producing a single Local Plan document. It is considered that the Core Strategy has been successful in allowing the four Black Country authorities to work together on strategic planning issues, whilst allowing detailed allocations and policies to be progressed flexibly at a local level. The NPPF is clear that early and meaningful engagement and collaboration with residents, organisations and businesses is essential.

The reviewed BCCS will be examined for “soundness” by an independent planning inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements. One of the tests of soundness will be whether it is founded on a robust and credible evidence base, and represent the most appropriate strategy when considered against the reasonable alternatives. The responses to the consultation exercises will form part of this evidence base: they will be used to help decide the matters to be considered in the documents and guide the policy choices where options exists.

A further test as to whether the Core Strategy is to be found sound, the four Council’s need to be able to demonstrate that consultation has taken place throughout the process and that we have actively tried to engage with people who have a stake in the future of the area.

Each Council has an adopted Statement of Community Involvement (SCI) which provides guidance on who we will involve in the production of planning documents and the techniques that might be used. SCI’s sets out the minimum levels of involvement that interested people

should be entitled to expect, but we would hope to exceed these levels. The consultation requirements will vary depending on what document we are working on and what stage we are at in its production.

1.2 Stages of Consultation

The Issues and Options Consultation is only the first of a number of stages in the development of the Black Country Core Strategy. The policies, decisions and land allocations are only formulated and finalised in the latter stages of the process when the plan publication is agreed by all four Councils and submitted to Secretary of State to be examined at a Public Inquiry by an independent Planning Inspector.

At each stage, public consultation will be carried out as the Core Strategy starts to evolve. Although there is flexibility as to how this is achieved at the discretion of local planning authorities, the National Planning Policy Framework and Guidance sets out the stages required. Stages 1 to 3 each take approximately one year to complete with Stages 4 and 5 taking a further year between them.

Stage 1 Issues and Options – sets out the planning and development issues that need to be addressed during the plan period and broad options as to how they can be addressed.

Stage 2 Preferred Option and/or Draft Plan – following further evidence gathering and consideration of matters raised during the consultation on the Issues and Options, a more detailed document is produced which sets out the likely emerging policies, proposals and allocations which will be considered in the final publication document

Stage 3 Publication – the Core Strategy Review is finalised and approved by all four Councils ready for submission to the Secretary of State for Communities and Local Government.

Stage 4 Examination in Public – the Secretary of State appoints a Planning Inspector to hold a Public Enquiry or Hearing on published plan to enable final public scrutiny of the Core Strategy. The Inspector examines whether the plan is sound and recommends any changes which need to be made in order to ensure soundness is achieved.

Stage 5 Adoption – Once the recommendations of the Planning Inspector have been taken into account, the Black Country Core Strategy can then be adopted by the four Councils.

This stage is the **Issues and Options** and focuses on scoping the Core Strategy review, the issues that the review will need to address and the identification of broad options.

Views were sought on:

- the period that the review should cover;
- the evidence base to be prepared;
- cross boundary and strategic issues that will need to be addressed;
- the key challenges that the Black Country faces;
- the level of growth that should be provided for;
- the opportunities that exist to accommodate this growth.

1.3 Objectives of the Consultation

Objective 1 - Understand what local people want the future of the Black Country to be in terms of housing, jobs, infrastructure and the environment.

Objective 2 – Understand how businesses, developers, investors and landowners foresee their role (ideas, thoughts and plans) in the future development of the Black Country

Objective 3 - Understand how key stakeholders foresee the future development of the Black Country

Objective 4 - To inform stakeholders about what we are doing and the stages we have to go through in plan making.

Objective 5 -To secure their involvement now and throughout the process of plan preparation.

Objective 6 - To try and get meaningful input, using a range of consultation tools and techniques to ensure we have a plan that best meets the needs of the Black Country.

2 Methods of Engagement

2.1 Main Consultation

The Issues and Options Document: An Issues and Options Report was produced that aimed to guide interested parties through the issues and ask questions to aid the consultation. This provided the full background and detail of the Issues and Options which the final Core Strategy will need to address and consisted of 118 pages and 119 different questions on all the topics and issues which need to be addressed.

On-line Consultations Document: The consultation software hosted an interactive version of the Issues and Options consultation document allowing consultees to comment on the document as they make their way through the different sections. Individuals received automatic notifications confirming that their consultation responses had been made. Following the consultation period all consultation representations have been collated and grouped together to allow for easier reviewing by officers. Paper/email copies have also been accepted and have been entered into the system by officers.

Paper Response Form: Throughout the consultation period the online consultation portal was widely promoted in order to encourage as many people as possible to use this method for replying. A paper response form was also produced to capture the representations of those who didn't wish to use the online method.

Call for Sites Questionnaire: To inform the Core Strategy review a Call for Sites was undertaken in parallel with the Issues and Options consultation, inviting land owners, developers and anyone who is aware of suitable sites to submit them for consideration through the plan making process.

In making a submission, information was required on the following:

- Location and access to site
- Potential use and capacity
- Constraints and assets
- Potential infrastructure requirements

Summary Leaflet and Questionnaire: A summary leaflet was produced that provided an overview of the key consultation issues and questions in order to encourage people to get involved in the consultation without requiring them to go through the full Issues and Options paper. This included a freepost address and was also available online.

Themed Press Releases: In order to break down the different elements of the Issues and Options consultation into accessible information the issues were presented as key themes that were considered to represent the themes that matter the most to the communities and businesses. These directed related back to what the review needs to address and were picked up through the press releases, consultation videos and social media messages. The table below sets out the timetable of themes.

1. Housing - 3 July
2. Jobs - 17 July
3. Transport - 31 July
4. Environment - 14 August

Press releases were also published in the following newspapers and websites

Date	Newspaper / Website	Article
29 th June	Dudley Council Website	Consultation launch
30 th June 2017	Walsall Council Website	Consultation launch
3 rd July 2017	Express and Star	Housing theme
13 th July 2017	Dudley Federation of Tenants & Residents Associations Website	Consultation launch
14 th July 2017	Planning officers Society Website	Consultation launch
17 th July 2017	Invest Black Country Website	Consultation launch
17 th July 2017	Black Country Skills Website	Employment land theme
18 th July 2017	Wolverhampton's Council Website	Employment land theme
18 th July 2017	Walsall Council Website	Employment land theme
18 th July 2017	Dudley Council Website	Employment land theme
20 th July 2017	Express and Star	Employment land theme
28 th July 2017	HVM City Website	Employment land theme
2 nd August 2017	One Walsall Website	Consultation launch
15 th August 2017	Wolves on Wheels website	Transport theme
22 nd August 2017	Express and Star (Dudley)	Environment theme
23 rd August	Black Country Radio website	Environment theme
26 th August	Express and Star (Walsall)	Environment theme
30 th August	Black Country Radio website	Consultation closing
30 th August	Dudley Council Website	Consultation closing
1 st September	Wolverhampton's Council Website	Consultation closing

Consultation Video: A consultation video was commissioned to provide an accessible overview of the consultation to help promote the consultation and reach a wide audience. This was used on social media and shown at the events. There was one overview video and four shorter videos that focused on specific themes which related to the press releases above.

Social Media: Social media was used as a way to promote the consultation period, consultation events and to raise awareness of the issues that the Core Strategy will be looking to address. In order to make the review more accessible a different theme was focussed on every two weeks of the consultation. These themes corresponded with the press releases and consultation videos.



Press Advert: In order to reach a wide audience an advert was placed in the local newspapers to promote the consultation along with an article explaining what the review was about and why it's important for people to have their say. This was published in the Chronicle and the Express and Star on the 13th July 2017.

Display Boards for Events: Pull up banners were used to promote the consultation and were used at events. They were also used within Council reception areas. Also, where possible, information on the consultation was provided on electronic display screens within Council buildings and reception areas.

Posters: Posters promoting the consultation period and local events were disrupted across the Black Country in community centres, cultural facilities including libraries and in some shops.

Frequently Asked Questions: A list of frequently asked questions were produced to support the consultation and provide further details on the process where necessary including information on why we are doing a review and the different stages of plan making. This was available on the website but also at events.

2.2 Consultation Events

The BCCS Review Launch Event

A launch event was hosted on the 13th July 2017 at the Black Country Living Museum. Invites for the event were sent out in April to our Duty to Co-operate bodies, general consultees, developers, agents and other organisations in order to provide a wide range of interest and perspectives at the event.

The event included an opening presenting that set out the issues then workshops covering the following topics:

1. Housing
2. Employment
3. Centres
4. Environment
5. Transport
6. Health & Well-Being



This was followed by feedback from the workshops and a Questions & Answer session.

Borough Specific Events

Throughout the consultation period a number of consultation events were held in all four authorities areas ensuring that there was a good level of coverage across of the Black Country of events where people could come along, ask questions and find out more about the review.

These events ranged from specific events with display boards to stalls at community events or in shopping centres. The table below sets out the events and the number of people each event reached.

Date	Venue
Saturday 15th July	Dudley Black Country Festival,
Saturday 15th July	Penn Library, Coalway Avenue, Penn WV3 7LT
Monday 17th July	Blackheath Library, Blackheath
Tuesday 18th July	City of Wolverhampton Council, Main Reception, Civic Centre WV1 1RP
Wednesday 19th July	Bilston Library, Mount Pleasant, Bilston WV14
Thursday 20th July	City of Wolverhampton Council, Main Reception, Civic Centre WV1 1RP
Friday 21st July	Walsall Council House, Lichfield Street, Walsall, WS1 1TW
Saturday 22nd July	Brier Fair, High Street, Brierley Hill
Saturday 22nd July	Collingwood Library, Broadway Gardens, The Broadway, Bushbury WV10 8EB
Saturday 22nd July	Tettenhall Library, St. Michael's Parish Centre, Upper Street, Tettenhall WV6
Wednesday 26th July	Willenhall Chart, 19 Gomer Street, Willenhall, WV13

Friday, 28th July	Rye Market Shopping Centre, Stourbridge
Tuesday 1st August	Aldridge Community Centre, Anchor Meadow, Middlemore Lane, Aldridge, WS9 8AN
Wed 9th August	Bloxwich Library Theatre, Elmore Row, Bloxwich, WS3 2HR
Thursday 10th August	Wednesbury Town Hall, Holyhead Road, Wednesbury, WS10 7DF
Tuesday 15th August	The Brasshouse Centre, Smethwick
Wed 16th August	Brownhills Library, Park View Centre, Chester Road North, Brownhills, WS8 7JB
Thursday 17th August	Darlaston Library, 1 King Street, Darlaston, WS10 8DE
Thursday 17th August	Whg Under the Sea Community Event, Whg Offices Walsall Town Centre
Friday 18 th August	Saddlers Centre, Walsall Town Centre
Thursday 24th August	Cornbow Shopping Centre, Halesowen
Sat 2nd September	New Square, West Bromwich

2.3 Duty to Co-operate

Section 110 of the Localism Act 2011 amended the Planning and Compulsory Purchase Act 2004 to introduce a “Duty to Co-operate” for Local Planning Authorities (LPA) and other public bodies. It places a legal duty on LPAs and specified prescribed bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

The Duty to Co-operate is not a duty to agree, however LPAs should make every effort to secure the necessary co-operation on strategic cross boundary matters before they submit their Local Plans for examination. The co-operation should produce effective and deliverable policies on strategic cross boundary matters.

Other public bodies, in addition to LPAs, are subject to the Duty to Co-operate by being prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013.

The Prescribed Bodies are required to co-operate with LPAs and the other Prescribed Bodies. These Bodies play a key role in delivering local aspirations, and co-operation between them and LPAs is vital to make Local Plans as effective as possible on strategic cross boundary matters. The Bodies should be proportionate in how they do this and tailor the degree of co-operation according to where they can maximise the effectiveness of plans.

3 Analysis of the Issues and Options Consultation

3.1 Response Numbers

Number of hits on the BCCS website = 8,000 times during the consultation period

Number of views for the videos = 175,000 times

Number of hits on social media = over 340,000

Formal representations = 1,696 formal responses

Social media response = over 300

Call for Sites = 132 during the consultation period

Petition numbers = 4 petition letters submitted by 518, 54, 22 and 22 residents

3.2 Key Themes and Responses Formal Representations

Part One: Responses to the Strategic Options

Reviewing the Strategy

- The majority of responses to this issue (developers) suggest the Vision & Sustainability Principles need revising - arguing that brownfield first approach does not align with NPPF and that the current approach does not provide the land / strategy to meet future development needs.
- Large numbers of objections (mostly from residents) around the strategy looking to review the Green Belt for both housing and industry.
- The majority of developers argue that the Spatial Objectives need revising to account for the development of GB sites and the move away from the Regeneration Corridors.
- Most respondents on Policies CSP1 and CSP2 agree they should be retained but should be reviewed and updated to reflect new evidence / development pattern.

Housing

- The majority of responses were from developers who support elements of both options in the document identifying the need to use green belt to accommodate the growth requirements. There is some agreement that certain industrial sites would be better as housing.
- However, there is some concern that the previous strategy to deliver housing on industrial land has not worked and that to continue such an approach would place pressure on businesses.
- Also concerns that there is not sufficient evidence on what sites are needed for industry, or about which sites would be suitable for housing.
- The majority of responses in favour of green belt release support a balance between rounding off the green belt and more extensive urban extensions.

- There are divided views on the level of detail needed on proposed urban extensions in the plan but there was overall agreement to address infrastructure requirements and to review the needs of each area based on its size and location.

Employment

- Argument from industrial developers that large, regular & unconstrained sites with good motorway / highway access are required and that this will need use of green belt sites.
- Some support for mixed-use urban extensions that include industrial uses.
- General agreement that some export of growth would be needed to other Boroughs but some argue this should be the last option. South Staffs is given as a potential location by a number of respondents.
- Call for wider consultation with landowners, developers & employers on the Economic Needs Assessment, plus some suggestion that employment sites currently identified are not fit for purpose and others that are identified to be transferred to housing remain in employment occupation. Also some concern raised over the figures for employment land needs being too high.
- Suggestion that employment sites could be provided on existing industrial sites through rationalisation and redevelopment opportunities.

Overall Issues on the Strategic Options

- Wildlife Trust, Local Nature Partnership and Natural England argue we should assess each proposed development on its merits rather than using a broad-brush approach and that there should be emphasis on assessing the impacts on, and the potential provision of, Green Infrastructure. Wildlife value of brownfield sites should also be recognised.
- Historic England requests further work to consider the impact on the historic environment and to explore opportunities for development to positively enhance and better reveal the significance of heritage assets.
- Concerns on both housing and employment options that urban extensions alone should not be relied on to meet any shortfall as they will not meet the need identified, especially in the short term, due to delivery timescales.
- For both housing and industry, consideration needs to be given to providing sites in areas with good, sustainable public transport links to meet communities' needs.

Part Two: Responses to General Theme Areas

Housing

- Various criticisms of the Strategic Housing Market Assessment methodology – particularly it should take account of new methodology
- Housing supply is affected by delivery problems – so the brownfield first approach should be reconsidered, discounts increased & windfall allowances reduced
- Some support for increased densities (40 dph) especially near transport hubs, but developers argue that this would not meet the current projected shortfall

- Some support for lower densities (30dph) / flexibility in possible green belt proposals
- General opposition to introduction of self build/ HMO policies
- Majority support for keeping the affordable housing policy as it is, including green belt sites if introduced
- Objection to removal of gypsy transit site target / should retain flexibility to accommodate South Staffs gypsy and traveller pitch need

Employment

- General agreement that the Plan should support additional economic growth but differing views on how much additional land is needed given economic uncertainty over such a long time period.
- Support for a continued focus on the “brownfield first” strategy but a recognition that green-belt land may be needed as well.
- Acceptance that the Plan should continue to allow active employment sites to remain but poorer quality sites no longer needed for industry could be redeveloped.
- The Core Strategy should continue to distinguish between Strategic High Quality Employment Areas and Local employment areas with appropriate uses in each.
- Support for the Plan identifying a portfolio of employment sites to meet a variety of investment needs rather than a broad brush reservoir approach.
- Mixed views on whether the Plan should continue to require large scale development to provide local recruitment and training programmes.
- The approach to identifying key cultural and visitor facilities should be retained and updated.

Green Belt

- Two petition letters submitted - one by 518 households and the other by 54 households. Both similarly set out general opposition to release of the green belt to the south of Dudley Borough around Halesowen and between Halesowen and Stourbridge.
- A number of responses from individuals and pressure groups were received also objecting to the potential release of green belt for housing / employment purposes - mostly for the Halesowen area and to the south of Dudley Borough.
- Objections to green belt release also received from some local Councillors and James Morris MP (Halesowen and Rowley Regis) and Wendy Morton MP (Aldridge/Brownhills)
- Local residents - opposed to development generally, especially in the Green Belt - but would like improved infrastructure.
- Responses from development interests cast doubt on viability of brownfield development (except where higher value uses sought for employment land / premises).

- The development industry is supportive of a review of green belt boundaries with some advocating provision of even higher housing numbers and green belt release than the evidence is suggesting
- A small number of other responses were received from organisations which may be affected by green belt release to ensure future consultation on any potential development needs including
 - Highways England
 - Historic England
 - Canals and Rivers Trust
 - Other groups such as Inland Waterways Association, Council for British Archaeology, West Midlands Campaign for Better Transport, Birmingham and Black Country Wildlife Trust / Local Nature Partnership, Lapal Canal Trust

Environment

- Support for incorporating 'Garden City' principles into new developments
- Support for updating Policy ENV2 regarding Historic Environment
- Concerns about national access standards for housing being introduced - due to viability issues
- Mixed responses in terms of removing specific references to canal projects
- Strong support for Sustainable Drainage Systems in new developments
- Surface water flooding is a major risk to the Black Country.
- Support for strengthening of Policy ENV6 regarding Open space, sport and recreation

Centres

- General agreement that the current hierarchy approach is suitable and that Strategic Centres should remain the focus of investment.
- Agreement that the retail and office figures for the Strategic Centres and the level of development for all centres should be revisited with appropriate evidence.
- Support for the inclusion of criteria for the creation of new centres might be needed as a result of additional housing.
- Support for a policy approach on diversification of uses in centres and targets for housing in centres.
- Suggestions that the strategy should do more to encourage the greening of centres.
- Concerns raised by the owners that the conditions on Brierley Hill (CEN3) are preventing investment in Merry Hill; however there are also concerns from others that the relaxing of conditions would have a impact on other centres.
- General support for the existing 'Meeting Local Needs' policy approach (CEN6) but some concerns on the threshold and evidence required.

- General support for the approach towards 'Controlling Out-of-Centre Development' (CEN7) but some backing for such development where there is a specific need.
- Different views on the role of policy in controlling car parks (CEN8) and the impact this has on the health of centres. Agreement that sustainable transport should be encouraged.
- Overall a general call for a flexible approach in all the policies to allow centres to adapt to change.
- Also some arguments made that the current policies are not consistent with National Policy.

Waste

- Support for updating of evidence base through new Waste Study
- Support for safeguarding of Strategic Waste Sites
- There should be more explicit recognition of the importance of waste management infrastructure to support sustainable economic growth.'
- Concerns about effects of waste management on proximity to housing - potential issue for development near existing waste sites as well as for new waste proposals
- Concerns about effects of land remediation on soils and groundwater
- Concerns about adequacy of waste water treatment capacity to cope with planned growth

Minerals

- There are significant cross-boundary mineral issues - Black Country currently relies on other areas to supply aggregates and to an extent, brick clay
- However, main subject of representations is minerals safeguarding:
 - For sand and gravel and brick clay in South Staffs (Staffordshire Minerals Local Plan 2017)
 - Conflicting views on the extent to which mineral resources in the green belt should be safeguarded
 - Concerns about effects of non-mineral development on mineral infrastructure and existing/ potential mineral working sites

3.3 The Call for Sites

During the Consultation period 132 sites were put forward as suggested future development sites. There was a broad range of supporting information submitted with site information ranging from basic geographic information while others were submitted with full site surveys and supporting evidence as to why they should be allocated for future development. About a quarter

of the sites submitted were actually outside of the Black Country boundaries mainly within South Staffs.

About 60 sites put forward in the consultation within the Black Country are in green belt locations. However there is also **a further 930 sites across the Black Country within the urban area already identified** by the four Boroughs within their Strategic Housing Land Allocation Assessments (SHLAAs) which are available to be viewed on the Black Country Core Strategy website.

Below is a series of tables showing the breakdown of the sites received during the consultation period.

Total number of sites submitted	Sites inside the Black Country Boroughs	Sites outside the Black Country Boroughs
132	97	35

Distribution of Sites (within the Black Country)

Borough	Total no. of sites	Within the Urban Area	Within the Green Belt
Dudley	31	11	20
Sandwell	9	6	3
Walsall	39	18	21
Wolverhampton	18	2	16
TOTAL	97	37	60

Distribution of Sites (outside the Black Country)

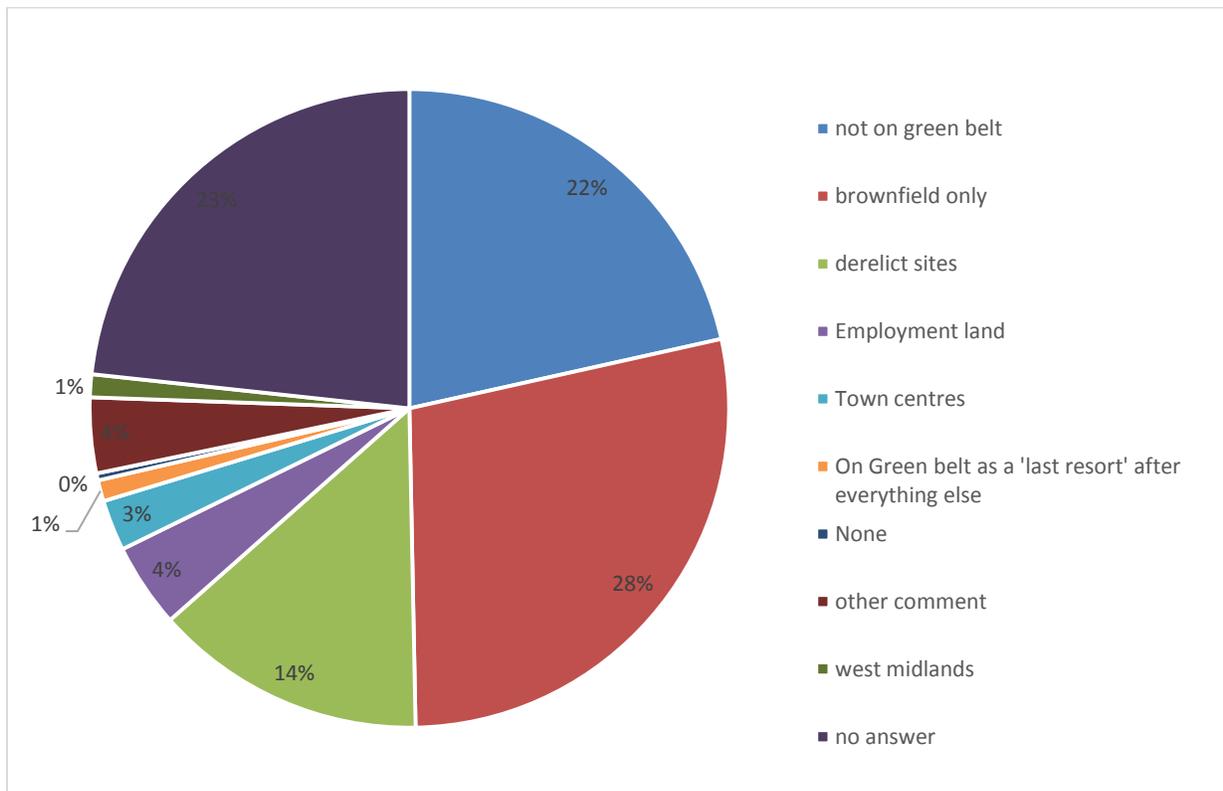
Borough	Total no. of sites	Within the Urban Area	Within the Green Belt	Nearest Black Country Borough to the site		
				Dudley	Walsall	Wolverhampton
Bromsgrove	3	0	3	3	-	-
South Staffs	32	4	28	4	4	24

3.4 The Summary Form and Questionnaire

The Questionnaire attached to the Summary Form was completed by 927 individuals. It was the preferred method of consultation from local residents whilst stakeholders, developers, landowners and consultants tended to submit more formal responses from the questions within the main Issues and Options document.

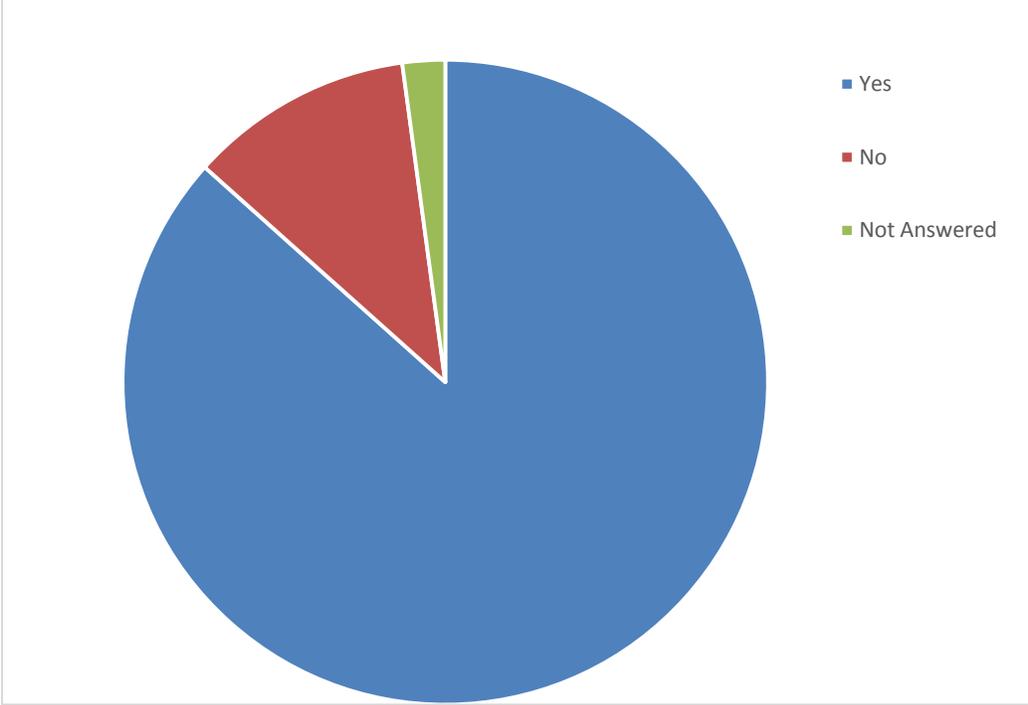
Analysis of the Questionnaire is continuing but initial analysis of a selection of the questions are set out below.

Question 1. Meeting Housing Needs – should extra new homes needed across the Black Country be built on the following:

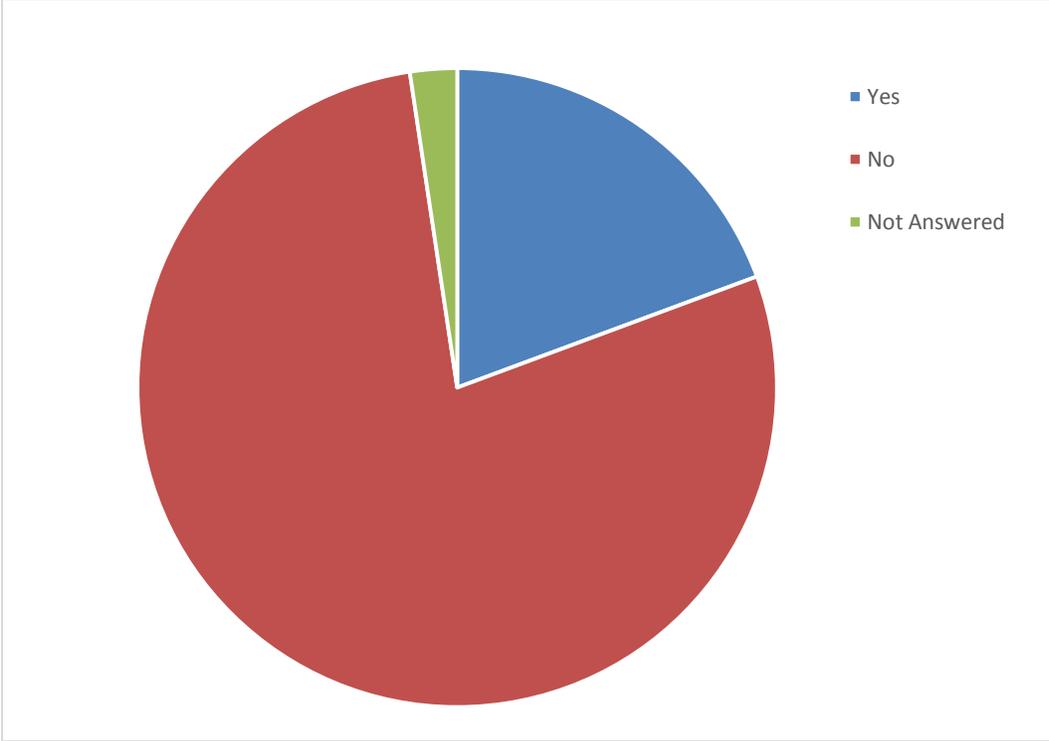


The items in the key are ordered to relate to the pie chart segments in a clockwise direction starting at 12 o'clock.

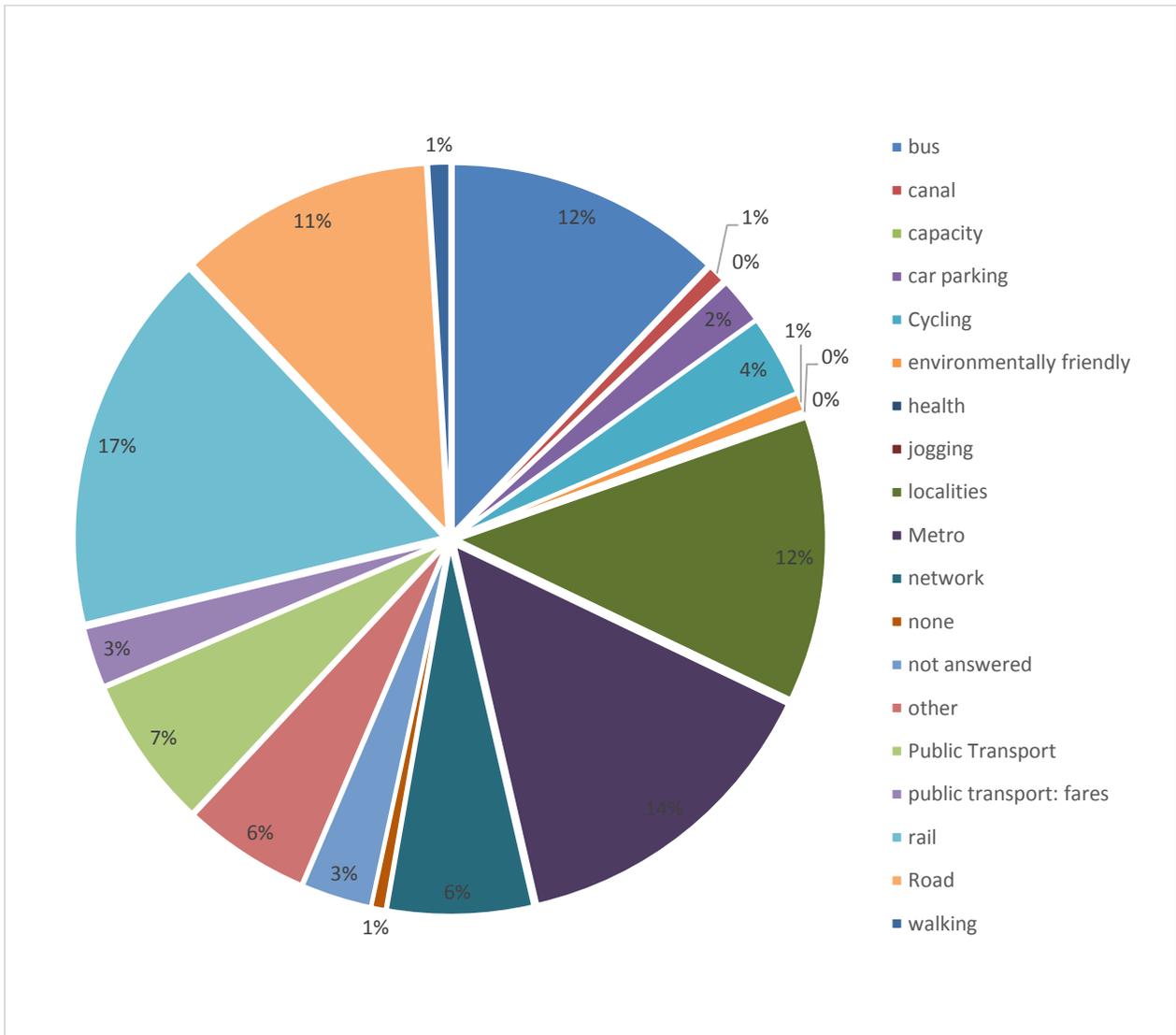
Question 3. Supporting our Town Centres – should we focus growth of shopping, leisure and commercial development into our main town centres?



Question 5. Reviewing the Green Belt – do we need to release some areas of green belt land to meet our future development needs?

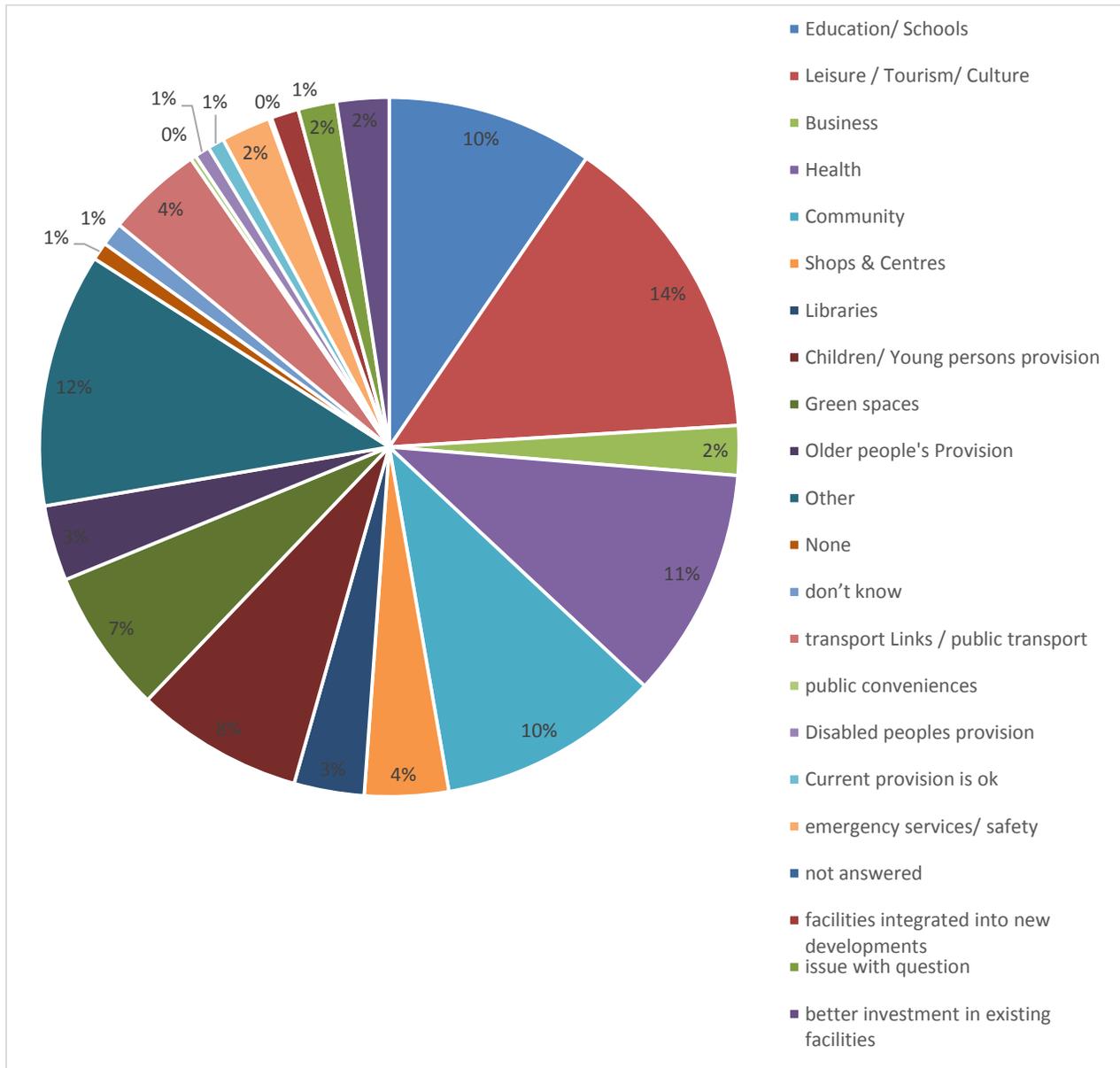


Question 6. Keeping the Black Country connected – what transport improvements do you think are required across the Black Country to improve the area’s connections?



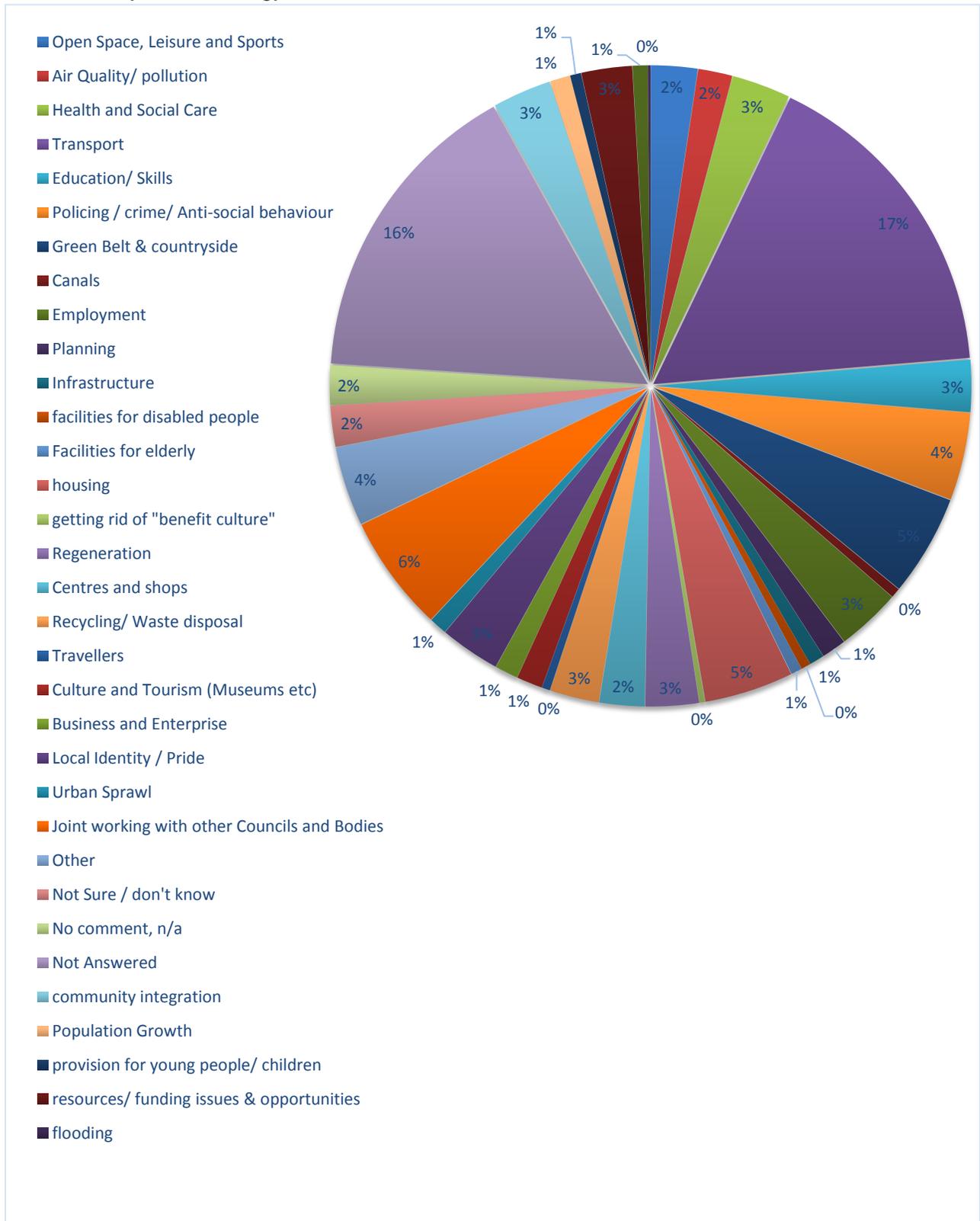
The items in the key are ordered to relate to the pie chart segments in a clockwise direction starting at 12 o’clock.

Question 7. Providing Community Facilities – what new community facilities might be needed to support future growth?



The items in the key are ordered to relate to the pie chart segments in a clockwise direction starting at 12 o'clock.

Question 9. Working with our neighbours – are there any West Midlands wide issues that the Black Country Core Strategy needs to consider?



3.5 Social Media response

Transport (27% of comments): A number of comments were based around the pressure more growth would place on the existing road network and the need to invest in improvements. There was also a number of comments around the management of parking and road congestion. A number of respondents raised the need to improve public transport and connectivity across the Black Country especially between centres and health care facilities. There was also a few comments about the need to improve cycle paths.

Housing (21% of comments): A number of comments were made around whether the new housing would be affordable housing. Also a number of comments were received around how the strategy should maintain a brownfield first strategy and look at the reuse of land and buildings before Green Belt. This included a number of mentions of the use of underused employment land for housing. A number of responders listed potential sites that they consider are suitable for housing.

There was a small amount of support for the provision of new housing to meet the needs of young people and also support for looking at bringing back into use empty properties along with support for Council house building. There was also a few comments around the need for 2 or 1 bed houses and bungalows. A number of people raised concerns around how travellers impact on open space and the need to make provision to meet their needs.

Environment/Open Space (12% of comments): A number of comments were received on the need to protect the natural environment and nature reserves. Also a number of comments about the need to protect open space and also look after the environment better in terms of maintenance of public spaces. A number of people raised concerns around how travellers impact on open space and the need to make provision to meet their needs.

Centres (11% of comments): Some comments were received around the health of Dudley centre and around the need to reduce rates and rents in centres. A few comments were made around how centres could accommodate more housing and vacant centres being brought back into life as homes.

Green Belt (9% of comments): A number of people commented about the need to protect Green Belt land arguing that the strategy doesn't need to use green belt land for development when there are brownfield sites which could be used, including derelict office blocks and vacant shops.

Employment (6% of comments): Some comments were received about the need to look at underused employment land for housing. There was however also some support for the delivery of more industrial jobs and the protection of industrial land for industry. Also one comment around the need to support existing businesses.

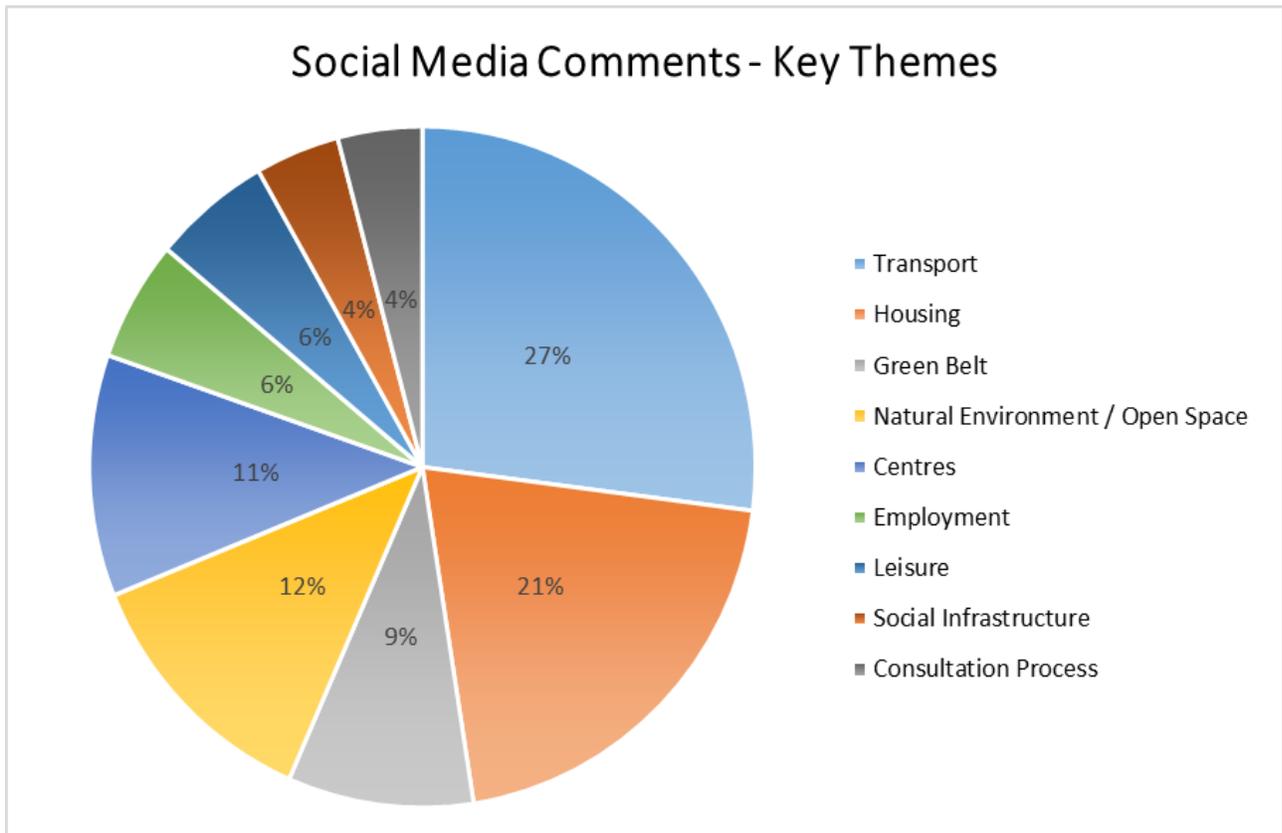
Leisure (6% of comments): A number of comments requested a speedway track. Some comments were received around the need to retain and enhance sports facilities such as tennis

courts and leisure centres. A few comments were also received around the need to promote tourism in the area building on the current assets and the history of the Black Country.

Social Infrastructure (4% of comments): A number of comments were received around the need to provide schools and other social infrastructure to serve future communities and also concerns around how new housing will place pressure on current facilities. One comment on how nature reserves and parks are important for mental and physical health and need to be protected for the future.

Consultation Process (4% of comments): There were a few comments based around concerns that communities wouldn't be listened to and that the consultation would not change any outcomes.

The table below shows the breakdown of social media comments by topics to give an indication of which themes generated the highest level of engagement.



4 Conclusions - how the responses will help shape the Black Country Core Strategy

The Consultation

The Issues and Options Consultation was very successful in its aims to reach a wide range of people, businesses, land owners and developers which live, work or who have a vested interest in the Black Country. Methods of publicity for the consultation including events, social media and a dedicated Black Country Core Strategy website helped to highlight the issues and the different decisions which may be required in the coming years to accommodate growth and development across the four Boroughs up to 2036.

The Consultation was therefore more far-reaching than any other planning consultation carried out within the Black Country previously and generated approximately 3,000 responses overall. However, although this gives us a good basis for continuing to engage during the development of the Black Country Core Strategy, there is **still room for improvement to broaden the range of responses further both geographically and by topic at future consultation stages.**

The Call for Sites

132 new sites were put forward for suggestion as potential development sites by land owners, developers and agents. The **majority of these sites are green belt sites** but this is **due to the fact that the four Boroughs already keep annually updated lists of brownfield sites** which are included within estimates of potential urban capacity up to 2036. There are approximately **930 such sites already identified in the urban area** capable of development which is in addition to those sites already with planning permission. All site proposals will have to be weighed up against the evidence gathered by the four Boroughs to see if any proposals are deemed suitable and which will be rejected by the local authorities in the future stages in the production of the Core Strategy.

The need for further evidence to corroborate or refute the representations.

Officers will **continue to go through the representations and submissions to help shape the next stage** in the development of the Black Country Core Strategy. In doing this, **a range of evidence will need to be collected or commissioned which will help support arguments for and against the competing interests which have emerged** in the representations received. It is crucial that all evidence is therefore collected to either support or refute all of the differing views which have been submitted.

The evidence base is therefore **crucial in giving us as much information as possible to make the informed decisions which will help to shape the Strategy.** It not only helps to tie the different issues together in different ways in different places but will also **help us to demonstrate to the Planning Inspectorate that the Strategy is sound** so that it can be

adopted. This includes the viability and deliverability of the Strategy and any specific proposals within it.

The following list of evidence is **a summary of the complex work to be undertaken** to inform the development of the preferred option as the next stage alongside the consultation responses received. It is not an exhaustive list and may be subject to change as the review progresses;

- Stage 2 Employment Land Study
- Review position regarding Housing Need
- Land Owners Intentions Study
- Urban Capacity Study
- Update greenspace audits/studies
- Green Belt Assessment – joint study with South Staffordshire (particularly to provide independent evidence on sites put forward by developers during the consultation)
- Technical assessment of ‘call for sites’ submissions
- Centres and Retail Study
- Viability assessments of development sites and proposals
- Strategic Flood Risk Assessment
- Strategic Transport Study
- Strategic policy updates
- Sustainability and landscape assessments
- Site specific technical assessments – both brownfield and greenfield sites. Technical assessments are wide ranging to establish suitability, or not for development and include the following; infrastructure, access, transport, ecology, heritage, conservation, environmental, sustainability, financial viability, owners intentions and other relevant planning criteria – depending upon the particular site circumstances.