

Glass Quarter SPD - consultation log (formal consultation – 18th September – 30th October 2009);

Written Representations Received

	Respondent	Summary of Response	Officer's Recommendation
1	Amanda Skipp, Centro	<p>Welcomes and supports the overall vision and objectives of the SPD. However there is no mention of public transport within the key findings of the urban design analysis and section 3.17 'Movement'.</p> <p>In list of planning obligations (3.35) "Transport Infrastructure Improvements" should read "public transport infrastructure and service improvements".</p>	<p>Noted, reference to public transport has been made in para 6.10 'movement'. Amendments have been made to section 3.35 to ensure the list of planning obligations adheres to Centro's advice.</p>
2	Plowden & Thompson Ltd, Dial Glass Works	<p>Pleased that the Glass area has now been recognised as a possible tourist destination and that it is an area in which work and home co-exist. The response also details the following issues with the document:</p> <ul style="list-style-type: none"> • 2.10 – 2.19 The response questions the accuracy of particular statements and their achievability • 2.20 Historic conservation needs to be in context with economic facts and decisions and not treated in isolation. • 2.32 Without specific knowledge of how the system works, it is difficult to inspect the points of high interest and relevance. • 2.33 The response questions the potential of Glass Quarters archaeological resource. • 2.34 What is meant by the increased capacity on the main highway running through the Glass Quarter? • 2.35 -2.38 Accessibility to the findings of the Urban HLC and how it is applied has been questioned. • 2.48 Query in relation to tourism sign. 	<p>2.10 Noted, however Dudley College now operates its glass course from the Mons Hill Campus of Dudley College. The statement is correct as Dudley College are still calling it the International Glass Centre.</p> <p>2.11 The statement made by Plowden & Thompson is supported. The SPD states later in 4.5 that we need to encourage the infrastructure for students and new artists to stay within the area – studios units of varying sizes, potentially with shared facilities.</p> <p>2.13 Visitor Numbers to the Glass Quarter have increased and the satisfaction of the attractions has indicated that visitors find it a popular destination. Dudley Attractions Survey is undertaken every 2 years.</p> <p>2.14 Para 3.14 Reference to these areas are provided to show examples of where regeneration of important heritage areas has been successful.</p> <p>2.15 The British Glass Biennale is open to British Glass makers or those who have been resident in Britain for more than 3 years.</p>

		<ul style="list-style-type: none"> • 2.53 Does the quote support the location of the boundary? • 3.14-3.21 and figure 13- The response states that active frontages and street furniture may encourage vandalism and restrict vehicular passage. Clarification of canalscape enhancement is required in practical terms. • 3.22 In relation to the opportunity sites what implications does the SPD have on the development of the land under the ownership of Plowden and Thompson? • 4.14 Concerns over the Dial Glass Works being located a Conservation Area. • 4.20 Notification of development briefs occurs after the event or not at all. • SWOT analysis lacks depth. It is a useful appendix to assist in identifying themes that look to improve the Glass Quarter. • The SPD will prove detrimental to both residents and businesses. 	<p>2.17 It is envisaged that the guidelines provided in the SPD will work towards achieving this vision for the Glass Quarter.</p> <p>2.20 The Historic Environment forms an important basis and purpose to the SPD as it is aimed at retaining the Glass Quarters unique heritage. All proposed development, however has to account for a range of issues (viability, highways, environmental protection) including the Historic Environment and once considered a balanced view is taken to reach planning decisions.</p> <p>2.32 In order ensure that the purpose of the SPD and its supporting evidence is easy to understand the aim and objectives of the SPD are provided at paragraph 1.10 and an explanation of the Historic Landscape Characterisation is provided within chapter 5.</p> <p>2.33 The assessment of the archaeological remains within the document is in line with national planning policy for archaeology as set out in Planning Policy Guidance Note 16 (PPG16): Archaeology and Planning, which is translated in the adopted UDP by policies HE8 – HE11. The review of archaeological sites and sites with the potential for the presence of significant archaeological remains in the Glass Quarter has been undertaken with a particular focus on the importance of remains of Glass Works sites, some of which continue in use. A number of Archaeological Priority Areas were identified through the Urban HLC. The criteria used to identify these are described in Section 3 of the Urban HLC and a review of each is provided in Appendix 2 of the Urban HLC. The identification of these areas through the document is intended to highlight their importance at an early stage. It should be used to encourage their appreciation as part of the wider historic environment resource and to encourage sensitive design solutions where</p>
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			<p>redevelopment is proposed. As such it should provide a degree of certainty, as well as protecting the archaeological resource.</p> <p>2.34 This paragraph refers to the increased traffic flows along the A491 and the provision road improvements (i.e. road widening) which creates fragmentation in the landscape.</p> <p>2.35-2.38 A web link to the Urban HLC is provided on the SPD website which should be used as an evidence base to guide new development. The proposed Listed/Locally Listed Buildings and Archaeological Priority Areas are listed in the Next Steps section of the document.</p> <p>2.48 Noted, however white on brown tourism signs are only available to those attractions that meet the Department of Transports regulations.</p> <p>2.53 The quote is provided to justify the location of the boundary in the Wordsley, Amblecote area.</p> <p>3.14-3.21 Enhancements to the surrounding environment from new development are usually sought through developer contributions through Section 106 legal agreements.</p> <p>3.22 Dial Glass Works owned by Plowden and Thompson is designated under the adopted Unitary Development Plan (2005) as a Local Employment Area under Policy EE2. This policy aims to protect small scale employment as these areas are vital for providing local employment.</p> <p>4.6 The Council aims to support all local businesses within the Borough in a manner appropriate to the products and services they supply.</p> <p>4.14 Noted. Conservation Area designation is decided under a separate process to this SPD. The Stourbridge Branch Canal (Amblecote) Conservation Area, including the Dial</p>
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3	Anthony Champion, Halls (Worcester) LLP	SPD is supported in that it provides opportunity for participation in the regeneration of this former industrial area. The response suggests that the following should be added as an objective of the SPD "to deliver a good quality residential development on those older under-utilised employment sites" which would be in line with the Preferred Options report of the Black Country Joint Core Strategy.	<p>As stated in para 1.5 the SPD expands on a number of key policies within the adopted UDP (2005) to provide guidance and detail on how the policies within the UDP should be implemented with respect to the Glass Quarter.</p> <p>The Black Country Joint Core Strategy has not yet been adopted and therefore the SPD cannot expand on policies within this document as it is not yet a statutory material</p>

		<p>The response raises concern that SPD excludes references to the release of poorly used and vacant employment sites for housing, which is included in the Core Strategy.</p> <p>The response considers that Figure 12 conflicts with the Core Strategy Preferred Options report as land along Old Wharf Road is shown as employment and the response suggested that this should be identified as an area to accommodate significant residential development.</p> <p>In the planning obligation section of the SPD the response highlights that if planning obligations are sought for new developments, then the obligation must be directly relevant and beneficial to the development.</p>	<p>consideration. Including guidance that accords with policies within the Core Strategy would be premature as it has not been adopted.</p> <p>The emerging Core Strategy has been considered as part of the production; however the purpose of the SPD is not to create new policy and for example allocate land for other uses it is purely expanding on existing policy to provide guidance for new development proposals.</p> <p>The SPD has been written to include flexibility to allow for changing policy frameworks (UDP and JCS) however should the SPD become inconsistent with a strategic planning document, this will trigger a review.</p>
4	John Berry, Sport England	<p>Sport England have reiterated the view that the SPD should not encourage development of any areas within the boundary that are used for sport or that would affect the quality or access to these areas.</p> <p>Para 3.19 Open Space is welcomed by Sport England, it is suggested that it may be appropriate to include reference to provision of Multi Use Games Areas (MUGA).</p>	<p>It is not the aim of the SPD to allocate land for specific uses but to expand on existing policies within the UDP. The urban design guiding principles (para 3.19) state that opportunities to enhance the quality and provision of open space within the Glass Quarter will be sought.</p> <p>Noted, however it is not considered that specific reference to MUGAs is necessary in this paragraph as this should be covered by other emerging policy which covers Open Space, Sport and Recreation.</p>
5	Katherine Burnett, British Waterways	<p>British Waterways (BW) supports the SPD for highlighting the importance of the canal network in the Glass Quarter and encourages the application of policy HE7 Canals which the SPD expands upon.</p> <p>BW supports the identification of the 3 most important character zones which relate to the Stourbridge Canal Conservation area.</p>	<p>Noted. Reference to 'blue infrastructure' has been added within para 6.11 'Stourbridge Canal' to address the importance of the canal network.</p> <p>The SPD does not rank the 15 Character Areas in order of importance. They are simply numbered for ease of reference. However, Character Areas 1 – 3 correspond with</p>

		<p>The response states that the SPD should avoid describing the canal as tranquil and instead the canals should be best addressed as 'blue infrastructure' with an aim being to protect, develop and enhance.</p> <p>BW's response supports the urban design guiding principles for the area and the section on planning obligations.</p>	<p>the areas of Conservation Areas which have previously been identified as having a distinct character.</p>
6	Amanda Smith, English Heritage	<p>English Heritage welcomes the preparation of the SPD and in particular strongly supports the application of the urban HLC.</p> <p>The response suggests that it would be useful for the SPD to make stronger links between the findings of the urban HLC and the urban design proposals.</p> <p>English Heritage has reservations regarding the emphasis placed on gateways and the use of landmark taller buildings for highlighting corner sites (3.12). Closer integration with the urban HLC is required here. The response suggests the possibility of introducing a coordinated public realm strategy throughout the area which would enhance the identity of the quarter.</p> <p>3.21 Where are the key views identified?</p> <p>3.14 & 3.20 Parking between houses could create weak frontages.</p> <p>3.35 Reference is required here to historic environment planning obligations.</p>	<p>Noted. Reference to a review of the public realm and signage in the Glass Quarter has been included in para 7.17.</p> <p>Noted. Stronger links to HLC in urban design framework have been made in the document with the inclusion of the Areas of High Historic Townscape Value in the Framework Plan and changes to the Next Steps chapter.</p> <p>Key views are shown in Figure 11. Noted, this has now been signposted in para 6.14.</p> <p>3.35 does not make reference to historic environment obligations as emphasis is placed on these in the previous paragraph (now 6.26).</p>
7	Simon Hawley, Harris Lamb Property Consultancy.	<p>Harris Lamb support the preparation of the SPD as it will have an important role to play in regenerating a poorly used former industrial area.</p>	<p>As stated in para 1.5 the SPD expands on a number of key policies within the adopted UDP (2005) to provide guidance and detail on how the policies within the UDP should be implemented with respect to the Glass Quarter.</p>

	<p>The response suggests that following objective be added to the SPD “To deliver high quality residential development on poorly used employment sites” to accord with the Preferred Options report of the Black Country Joint Core Strategy. The response states that reference to the Core Strategy in the SPD is incomplete.</p> <p>The response raises concerns that the Opportunity Sites section conflicts with the Core Strategy Preferred Options report as the land to the south of the Glass Quarter bounded by the canal and sports ground is shown as employment and the response suggested that this should be identified as an area to accommodate significant residential development.</p> <p>“The SPD divides the Glass Quarter in to a number of distinct character areas. These character areas are identified, and ranked in terms of importance, at paragraph 2.27”</p> <p>Harris Lamb suggest that para 3.35 in relation to planning obligations should be removed, as it is not necessary to repeat what is included in the Planning Obligations SPD. If the Planning Obligations is revised then this may cause confusion.</p>	<p>The Black Country Joint Core Strategy has not yet been adopted and therefore the SPD cannot expand on policies within this document as it is not yet a statutory material consideration. Including guidance that accords with policies within the Core Strategy would be premature as it has not been adopted.</p> <p>The emerging Core Strategy has been considered as part of the production; however the purpose of the SPD is not to create new policy and for example allocate land for other uses it is purely expanding on existing policy to provide guidance for new development proposals.</p> <p>The SPD has been written to include flexibility to allow for changing policy frameworks (UDP and JCS) however should the SPD become inconsistent with a strategic planning document, this will trigger a review.</p> <p>The UDP opportunity sites section of the SPD has been removed from the SPD, and instead has been replaced by sites that make a significant contribution to the character of the Glass Quarter in terms of their heritage and existing value or potential as prominent visitor destinations, so as to avoid any misunderstanding of their role.</p> <p>The character areas are identified and numbered for ease of reference but are <u>not</u> ranked in terms of importance. Character Areas 1 – 3 correspond with existing designated conservation areas.</p> <p>The planning obligations section of the SPD has been</p>
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			<p>provided to emphasise the requirement for planning obligations for proposed new development in the Glass Quarter. It has also been included to signpost the adopted Planning Obligations SPD (2009), which will assist readers if they are considering putting forward a proposal in the area.</p> <p>Again, as with the Core Strategy, if the Planning Obligations SPD is revised and the Glass Quarter SPD conflicts with the adopted version then this would require a revision to parts of the SPD.</p>
8	<p>Dave Woodruff, Dudley Borough Local Access Forum.</p>	<p>In relation to the A491, the response states that this arterial road will be difficult to improve, however the main opportunities will be to frontages and development of derelict open spaces.</p> <p>By encouraging people to walk and cycle in the Glass Quarter there is a link to the 'Healthy Towns' initiative.</p> <p>The response questions what provision has been made for people with disability/mobility problems within the Glass Quarter.</p> <p>It is advised that the SPD should enlist the help of local experts to give inclusively and ownership for those living in the Glass Quarter.</p> <p>The response suggests that the western end of the Town Arm canal should be enhanced and proposes a linear nature reserve, due to wildlife present there.</p> <p>An error on Figure 7 has been highlighted in the response.</p>	<p>Noted.</p> <p>We have consulted a range of stakeholders who are local to the Glass Quarter in order to obtain local knowledge to inform the production of the SPD. This was done early on in the process during the frontloading consultation stage.</p> <p>The purpose of the SPD is not to create new policy to for example allocate land for other uses, i.e linear nature reserve. The SPD purely expands on existing policy to provide guidance for new development proposals, therefore it would not be the function of the SPD to allocate the western end of the Town Arm canal for a linear nature reserve.</p> <p>Figure 7 has been amended accordingly.</p> <p>Noted, however Merry Hill is not covered by the geographical location of the SPD.</p>

		The response details potential refurbishment to the North of Merry Hill.	
9	Mark Harrison, The Coal Authority	<p>The Coal Authority has noted that the SPD is consistent with national policy.</p> <p>The response details that there is a legacy of past coal mining activity immediately adjacent to the proposed Glass Quarter SPD boundary. If the boundary is to be revised and includes the mining legacy then the Coal Authority would expect the SPD to acknowledge the issue of mining legacy in line with PPG14: Development on Unstable Land.</p>	Noted. Detailed redevelopment proposals are not included within the SPD and therefore consideration of coal resources and unstable land would be looked at under pre-application or planning application, in line with PPG14.
10	Dr. P. Collins, South Staffordshire Council	<p>Dr. Collins has queried the use of the term 'Glass Quarter' and has suggested a statement to be included at the start of the document.</p> <p>The remainder of the response provides suggestions in relation to the historical context of the Glass Quarter and also make the document easier to follow.</p>	<p>Noted. The introduction has been amended to include an initial outline of the Glass Quarter area.</p> <p>Noted. The link to the Glass Quarter HLC has been made more visible on the website.</p>
11	Diane Clarke, Network Rail	No comments to make at this time.	Noted.
12	Kevin Harvey, Highways Agency	The response states the area of the Glass Quarter is remote from the Highways Agency's Strategic Road Network and therefore they do not have any comments to make in this occasion.	Noted.
13	Local Resident	<p>The response states that the Glass Quarter Urban HLC should be treated as 'sister document' and the summary of the HLC should not be included within the body of the SPD but as an appendix.</p> <p>It is suggested that the boundary map should be earlier on in the document to make it easier for the reader to find.</p> <p>The response includes suggestions for the Urban Design Vision</p>	<p>Noted, however it is considered that an explanation of the HLC is required within the structure of the SPD as this is a prominent evidence base for the document and explains the formation of the Glass Quarter boundary.</p> <p>Noted. The boundary map will form part of a new chapter so that it is easily accessible.</p> <p>It is considered that Urban Design Framework covers most</p>

		<ul style="list-style-type: none"> -need for signposting and/or celebration of Glass Quarters in Local Centres such as Wordsley and Amblecote. -Role of the River Stour -Shaping the quarter so that it is easier to navigate. -enhancement of the canalside environment. -visitor parking 	<p>of these issues, in particular with reference to gateways and landmarks in the Glass Quarter and enhancement of the canalside environment. There has been a focus on the canal rather than the River Stour as most of it is outside the study area and glass industry was focused along the canalside. The role of river environment will be covered by other LDF documents such as the Core Strategy, the Development Strategy DPD and possibly more specific development briefs.</p>
14	Vaughan Welch, The Inland Waterways Association (IWA)	<p>IWA welcomes the draft SPD for the Glass Quarter which is considered to be well researched and helpful for potential users. The response makes the following points:</p> <ul style="list-style-type: none"> - Need to include reference to sand as key component of glass making in para 2.2. - 2.19 Need to add reason for glassworks being near to canal network. - Chap 2 Fig 3 – Should Rastick’s foundry be added here? - Support the application of HE4, HE6 and HE7. - Implication of sand deposits for glass industry to include in para 2.50 - Figure 8 – Should Rastick’s Foundry be included? - Support of Frontages and Enclosure section. - Would welcome a bullet point under 3.18 to address the need to inform canal visitors of where they are. - Support of guidance to improve canalside environment. - 3.35 Suggestion of additional planning obligation to increase visitor numbers. - 4.18 Should Kinver Light Railway Tram Sheds be listed? 	<p>Noted. These points have been added in the relevant sections.</p> <p>Fig 3 and Fig 8 – This has been added to the relevant figures.</p> <p>3.18 Work has been conducted with British Waterways and other organisations on producing guides, leaflets and information on websites to improve visitor orientation. Enhancement of the public realm is also a guideline in the SPD.</p> <p>3.35 This would not be the purpose of a planning obligation as these have to accord with Circular 05/05, i.e. directly related to the development.</p> <p>4.18 The Kinver Light Railway tram sheds are currently recorded on the Council’s List of Buildings of Local Historic Interest. There are no plans to propose them for statutory listing.</p>
15	Ian Clements, Ruskin Mill Educational Trust (RMET)	<p>RMET supports the preparation of the Glass Quarter SPD. The response summarises future development of the Glasshouse site and details its delivery with funding streams from Advantage West Midlands and the Heritage Lottery Fund.</p>	<p>Noted and seen as a positive step to achieving the objectives of the SPD.</p>

16	Kazi Hussain, Advantage West Midlands (AWM)	AWM welcomes the SPD. AWM would like reference to the West Midlands Economic Strategy (WMES) as the SPD will play an important role in shaping perceptions of the Glass Quarter and aligns with section 2.7 of the WMES.	Noted reference to the WMES has been added within the introduction under the Regional Policy Context.
17	John Hughes Law Practice	<p>The response acts on behalf of Vee Bee Filtration Ltd who are the owners and occupiers of the site at Old Wharf Road, Stourbridge.</p> <p>No concern has been raised with the overall aims of the SPD, however John Hughes Law Practice is of the opinion that the SPD implies that Vee Bee Filtration Ltd are mis-located which conflicts with the adopted UDP (2005) as the area is designated as a Key Industrial Area. Concerns have been raised regarding the inclusion of the land at Old Wharf Road, enclosed by the canal and the high goals that the SPD sets for the area are unrealistic.</p> <p>The response states that the policies within the SPD are premature because they accord with the emerging Black Country Joint Core Strategy which identifies land to the north of Stourbridge to accommodate additional housing. A suggested statement to include in the SPD has been provided, this recommends that the area of land at Old Wharf Road should be treated separately to the remainder of the Glass Quarter and it would be inappropriate to expect it to contribute to the wider vision of the Glass Quarter.</p> <p>On the basis of the statement provided, it has been suggested that figures and paragraphs which highlight the industrial area should be amended, removing any reference to the area.</p>	<p>Noted. The land at Old Wharf Road has been included within the boundary due to the evidence provided by the Urban Historic Landscape Characterisation (HLC) and its prominent canal side location. This area is also seen as a gateway to the Glass Quarter.</p> <p>As stated in para 1.5 the SPD expands on a number of key policies within the adopted UDP (2005) to provide guidance and detail on how the policies within the UDP should be implemented with respect to the Glass Quarter. The purpose of the SPD is not to create new policy and for example allocate land for other uses, it is purely expanding on existing policy to provide guidance for new development proposals.</p> <p>Whilst the emerging Black Country Joint Core Strategy (BCJCS), as well as other regional and national planning policy listed under the planning policy framework were taken into account during the production of the SPD, the BCJCS has not been adopted and therefore the SPD cannot expand on policies within this document as it is not yet a statutory material consideration.</p> <p>The SPD has been written to include flexibility to allow for changing policy frameworks (UDP and JCS) however should the SPD become inconsistent with a strategic planning document, this will trigger a review.</p>

			<p>The UDP opportunity sites section of the SPD has been removed from the SPD, and instead has been replaced by sites that make a significant contribution to the character of the Glass Quarter in terms of their heritage and existing value or potential as prominent visitor destinations so as to avoid any misunderstanding of their role.</p>
18	<p>Sarah Burgess Commission for Architecture and the Built Environment (CABE)</p>	<p>CABE were unable to comment on the specific document but provided general comments on the importance of implementing robust design policies within LDF documents. Design should reflect understanding of local context, character and aspirations.</p>	<p>Noted.</p>

**Glass Quarter Supplementary Planning Document
 'Drop-in' Workshop Event
 19th October 2009 Amblecote Methodist Church, Amblecote.**

The table below details the attendees at the drop-in session held on 19th October as part of the formal consultation. There were approximately 15 attendees, however some members of the public chose not to indicate their attendance.

The purpose of the event was to answer any questions people had regarding the SPD and consider any views they had.

Name	Organisation/address
Dr Paul Collins	South Staffordshire Council
Rob Lewis	Crane Services (Platts Crescent)
Mike Laurne	Old Glass Place, rear of Crane Services
Stephen McMurray	Micron Alloy Castings Ltd, Platts Road
Dave Woodruff	Sustrans, Access Forum and Local Resident (Wollaston)
Richard Beadman	Plowden and Thompson Ltd
Barbara Beadman	Plowden and Thompson Ltd

The main issues raised with the document and Officer response are detailed in the table below.

Issues raised	Response
Purpose of the SPD and role within the planning system.	It was explained that the SPD provides guidance that expands on policies within the adopted Unitary Development Plan (UDP)(2005) and does not create new policy.
Whether the SPD allocated any land for particular uses.	The SPD accords with the UDP and therefore does not allocate any land for uses that conflict with the UDP.
Clarification of the terminology used within the Urban Design Framework.	Noted. Definitions of the urban design terms will be added to the glossary.
Purpose of the Glass Quarter Urban HLC	This was explained in line with para 2.21 of the SPD.