Contents

List of Core Policy Areas 2

1. Introduction 4

2. How to Use the Document 7

3. What is the Black Country Like Now? 11


5. Delivery and Monitoring: Implementing the Spatial Strategy 31

6. Directions of Change 38
   • Sustainable Communities 38
   • Environmental Transformation 55
   • Economic Prosperity 78

Key Diagram (A2 plan available separately from this document)

Appendices

Appendix One – Alignment of Sustainable Community Strategy/Community Plan Objectives/Aims with the Core Strategy 118

Appendix Two – Regeneration Corridor and Strategic Centres Spatial Options (Separate A3 document)

Appendix Three – Technical Evidence 124

   Appendix Four – Draft Monitoring Framework 128
List of Core Policy Areas

Core Spatial Policy 1 – The Role of the Strategic Centres
Core Spatial Policy 2 – The Role of the Regeneration Corridors and Free-Standing Employment Sites
Core Spatial Policy 3 – Approach to Development outside the Strategic Centres and Regeneration Corridors (excluding Free-Standing Employment Sites)
Core Spatial Policy 4 – Phasing and Delivery of Housing on Employment Land
Core Spatial Policy 5 – Provision of Infrastructure

Direction of Change 1 – Sustainable Communities

Core Policy 6 – Delivering Sustainable Housing Growth
Core Policy 7 - The Density of New Residential Development
Core Policy 8 - Tackle Areas of Low Demand
Core Policy 9 – Provide a Well Balanced Range and Choice of Housing
Core Policy 10 – Deliver Affordable Housing

Core Policy 11 – Promote the Sustainable Location of Community and Sports Facilities
Core Policy 12 – To Provide Accessible Transport Networks and Establish Sustainable Accessibility Standards
Core Policy 13 – Cycling and Walking Networks

Direction of Change 2 – Environmental Transformation

Core Policy 14 – Ensuring High Quality Design in all New Development
Core Policy 15 – Protecting and Enhancing Local Character and Distinctiveness
Core Policy 16 – Delivering Environmental Transformation
Core Policy 17 – Delivering Sustainable and Energy Efficient Construction
Core Policy 18 – Renewable Energy
Core Policy 19 – Safeguarding the Black Country’s Minerals Resources
Core Policy 20 – Maintaining a Continued Supply of Aggregate Minerals in the Black Country
Core Policy 21 – Supply of Clay to Brickworks
Core Policy 22 – Energy Minerals
Core Policy 23 – Natural Building Stone
Core Policy 24 – Prudent Use of Mineral Resources

Direction of Change 3 – Economic Prosperity

Core Policy 25 –The Importance of the Black Country Centres for the Regeneration Strategy
Core Policy 26 – Directing the RSS Comparison Retail and Office Development Requirements to the Strategic Centres
Core Policy 27 – The Smaller Town and Large District Centres
Core Policy 28 – Smaller District Centres and Local Centres
Core Policy 29 – Meeting Local Needs for Shopping and Services
Core Policy 30 – Controlling Edge-of-Centre and Out of Centre Developments

Core Policy 31 – Providing the Transport requirements to Support the Strategy
Core Policy 32 – Establishing Parking Standards
Core Policy 33 – Improving the Highway Network
Core Policy 34 – Support the Effective Movement of Freight

Core Policy 35 – Providing for Economic Growth
Core Policy 36 – Provision of High Quality Employment Land
Core Policy 37 – Providing and Safeguarding Local Employment Land
Core Policy 38 – Providing for Offices and Services
Core Policy 39 – Clustering of High Technology Businesses
Core Policy 40 – Improving Access to the Labour Market
Core Policy 41 – Addressing the Black Country’s Waste and Resource Management Requirements
Core Policy 42 – Location of New Waste and Resource Management Facilities
Core Policy 43 – Waste Disposal
1. Introduction

1.1 The Black Country Joint Core Strategy (the Core Strategy) will be the key statutory plan guiding urban renaissance in the Black Country in accordance with the Regional Spatial Strategy for the West Midlands and the key document in the portfolio of planning documents for each local authority. It will set out the vision, spatial 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.

1.2 The Core Strategy will be a forward looking, growth orientated strategy aimed at delivering a restructured, regenerated and more attractive Black Country. The Black Country, made up of the local authority areas of Dudley, Sandwell, Walsall and Wolverhampton, is an area facing considerable challenges over the next 20 years. It has ambitious aspirations to achieve future growth and competitiveness for this sub-region of over one million people, creating almost half a million jobs and over 60,000 new homes through transformational urban renaissance. The aim of the Core Strategy is to balance this high level of growth with the need to protect and enhance the Black Country for future generations of residents.

1.3 The Black Country local authorities, working with public, private and voluntary sector partners through the Black Country Consortium, have established a clear strategy for achieving urban renaissance by 2031. This is set out in the Black Country Study, which focussed on two major drivers of Black Country renaissance: lifting educational and skills performance, and transformation of the environment.

1.4 The Black Country Study informed preparation of the West Midlands Regional Spatial Strategy Phase One Revision: The Black Country, which was adopted in January 2008. This establishes the broad spatial strategy for the Black Country: to achieve urban renaissance by focusing growth on four Strategic Centres (Wolverhampton, Walsall, West Bromwich and Brierley Hill), four Employment Land Corridors and high volume public transport corridors. Enhanced transport infrastructure, in particular good quality, high volume public transport connecting the Strategic Centres and serving growth corridors, green infrastructure and the creation of the ‘Black Country Urban Park’, are identified as key to delivering that spatial strategy.

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

1.6 The content of the Preferred Options 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 to create a more sustainable future for the Black Country are also proposed.

Chapter Five – Delivery and Monitoring: Implementing the Spatial Strategy – 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 and links with other 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’ for the area in 2026
- 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 improvements 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
Appendix Three - Technical Evidence – lists the technical evidence that has been used to produce the Preferred Options Document.

Appendix Four – Draft Monitoring Framework – identifies the proposed monitoring indicators, baseline/target data and sources of information to be used to monitor the effects of the Core Strategy.

Sustainability Appraisal Report

1.7 As the Core Strategy gradually takes shape, its preparation is being informed by an on-going Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process, carried out independently by consultants. SEA is a process for evaluating the environmental consequences of proposed policies, plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making. SAs are broader and promote sustainable development through integration of environmental, social and economic considerations into the plan's preparation. The SEA process is incorporated in the SA process for the Core Strategy.

1.8 As the Preferred Options document was drafted it was subject to an on-going sustainability appraisal and was amended where possible to respond to concerns raised. A detailed Sustainability Appraisal of the final Preferred Options document has been produced, to be read alongside it. The Sustainability Appraisal text at the end of each section summarises the positive and negative issues highlighted in this Report.
2. How to use the Document

2.1 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.

2.2 We received representations and comments from a variety of organisations and individuals, and we have posted a summary of these on the Core Strategy website 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 preparation of the Preferred Options document.

2.3 The results of the Issues and Options consultation and the Stakeholder events, along with the on-going Sustainability Appraisal process and 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.

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

- Sets out our preferred spatial strategy 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
- 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

2.5 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. This will help to inform preparation of the Submission Core Strategy document.
How to make your comments on the Preferred Options document

2.6 We are seeking your views on the Preferred Options document and the accompanying Sustainability Appraisal. We would also like to know if there is anything we have not addressed that you think is important. In particular, we need you to consider our suggested Core Policy Areas, referenced CP1 to CP43. For most Core Policy Areas we are simply asking whether you agree with our preferred approach (the questions shown in blue boxes). For some Core Policy Areas we are seeking a more detailed response to guide selection of a preferred approach (the questions shown in yellow boxes).

2.7 Government policy is that the Core Strategy is considered to be ‘sound’ or fit for purpose unless shown to be otherwise. This means that if you wish to object to any part of the Core Strategy Preferred Options, you must specify why it is not sound. It would be helpful if you could submit your responses using the Core Strategy representation form. This form sets out the Government’s tests of soundness as they apply to the Core Strategy Preferred Options.

2.8 You can respond in the following ways:

• By visiting the Core Strategy web-site (http://blackcountrycorestrategy.dudley.gov.uk) and completing the on-line representation form.

• By visiting the planning offices and main libraries in each local authority, where copies of the Preferred Options Report will be available for inspection and representation forms will be available to complete (details set out below).

• By completing a representation form and sending it to:

  The Black Country Consultation Team
  Ubikus
  Clifford’s Inn
  Fetter Lane
  London
  EC4A 1LD

• By attending a local consultation event, details of which will be advertised by each local authority on both the Black Country Core Strategy website and each local authority’s website.

Your comments need to be received by us by 28th April 2008
Contact details for each local authority:

Directorate of the Urban Environment
Dudley MBC
3 St James’s Road
Dudley
DY1 1HZ
Tel: 01384 817214
www.dudley.gov.uk

Directorate of Planning and Transportation
Sandwell MBC
Development House
Lombard Street
West Bromwich
B70 8RU
0121 569 4195
www.sandwell.gov.uk

Strategic Regeneration
Walsall MBC
2nd Floor
Civic Centre
Darwall Street
Walsall
WS1 1DG
Tel: 01922 652478
www.walsall.gov.uk

Planning Policy and Urban Design
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RP
Tel: 01902 552177
www.wolverhampton.gov.uk

What Happens Next

2.9 Once the consultation period is over, we will take the comments we have received into account when preparing the Submission Core Strategy. This document will set out the vision, spatial objectives, spatial strategy, policies and broad locations for development that we require to facilitate the transformation of the Black Country over the next 20 years. The Submission Core Strategy 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 effectively deliver the vision and spatial objectives.
2.10 The remaining stages for production of the Core Strategy are shown below. The shaded boxes indicate those stages where we would like to hear your views.

<table>
<thead>
<tr>
<th>March 2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public participation on Preferred Options document and Sustainability Appraisal Report</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>May 2008 – October 2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Analyse responses and prepare Submission Core Strategy</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>October 2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultation on Submission Core Strategy and final Sustainability Appraisal Report</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>December 2008 – April 2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prepare for examination</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>April 2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Independent examination of Submission Core Strategy</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>October 2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adoption and publication of Core Strategy</td>
</tr>
</tbody>
</table>
3. What is the Black Country Like Now?

3.1 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.

3.2 The Black Country has many social and economic strengths particularly in terms of its cultural diversity and heritage. 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. It is home to a variety of Black, Minority and Ethnic (BME) communities, making up 15.2% of the total population. 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.

3.3 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.

3.4 A £3.5 billion output gap with the UK average has emerged, one third of the West Midlands Region’s £10 billion output gap, which the four Black Country local authorities have come together with other public, private and voluntary sector partners to address through the Black Country Study. There are some 100,000 fewer skilled jobs today than in the 1970s and 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.

3.5 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 vision and spatial strategy set out to transform these corridors will have a major impact on these deprived areas.

3.6 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.

3.7 For these reasons, the Core Strategy will seek to achieve and deliver 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.

3.8 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.

3.9 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.

3.10 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.

3.11 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 and its transportation network.

3.12 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, a sub-regional partnership, the Black Country Consortium, has been established to co-ordinate the work of local and regional public sector partners, the private sector and the voluntary sector. The City Region will also 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.

3.13 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, reduction of carbon emissions, 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**

4.1 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.

4.2 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 set out the collective aspirations of the Black Country local authorities and partners for urban renaissance in the Black Country. They 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.

4.3 The RSS Phase 1 Revision Objectives for the Black Country also provide a key context for the Core Strategy:

a) To reverse out-migration
   - accommodating within the Black Country all of the generated household growth from 2011
   - meeting at least the levels of housing provision identified in Policy CF3 table 1;

b) To raise income levels
   - raising demand and household incomes (average earnings, GDP per head and reducing unemployment) to the UK average by 2033;

c) To create an inclusive and cohesive society within the Black Country
   - removing barriers to opportunity
   - changing the socio economic mix by increasing the proportion of social grades A and B to match the national profile by 2033 or earlier;

d) To transform the Black Country environment
   - protecting and enhancing the sub-region’s environmental and heritage assets and biodiversity
   - implementing the Black Country as Urban Park concept.

4.4 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.

4.5 We are mindful of not ‘reinventing the wheel’ when so much work on visioning has taken place previously. The existing visions 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. Our vision must 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.

4.6 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 create a step change in the image and environmental quality of the Black Country to underpin social and economic transformation as it meets the challenges of growth by delivering 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, open spaces, and industrial and architectural heritage. Transformation, and in particular delivery of a high quality, multifunctional green space network, will be supported by Environmental Infrastructure Guidance.

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, deliver a network of successful strategic, town, district and local centres to improve the wealth and image of the Black Country, and support initiatives to lift educational and skills performance.

4.7 Achieving this vision will require delivering a number of over-arching guiding sustainability 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. This will include not only making prudent provision for resources and energy, but also ‘putting the right thing in the right place’ to strengthen centres and ensure easy access to facilities.

3. Social inclusion: ensuring all members of the community have the best possible access to facilities, housing and opportunities.
4. **The ‘Brownfield First’ principle**: ensuring that previously developed land, particularly where vacant, derelict or underused, is prioritised for development over Greenfield sites.

5. **A comprehensive approach to development**: to ensure that new development links well with surrounding areas, makes efficient use of land, improves amenity, avoids a piecemeal approach that could result in blight and constrain neighbouring uses and provides infrastructure necessary to support individual developments in a co-ordinated way. In view of this, Site Allocation Documents, Area Action Plans and other planning documents will be promoted as the preferred mechanism to achieve a comprehensive approach in areas of large-scale change.

4.8 The RSS Phase 1 Revision has already established general policies and proposals for the Black Country which will help to ensure that these guiding sustainability principles are met. The broad spatial strategy selected for the Black Country is highly sustainable, concentrating growth in the most accessible locations, within Strategic Centres and along public transport corridors. The vast majority of new housing will be built 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.

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

**Black Country Joint Core Strategy Spatial Objectives:**

4.10 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 town, district and 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 development of local facilities, housing led development and environmental improvements to create safe, attractive streets and spaces.

6. **A high quality environment** fit for the future, and a strong Urban Park focussed on beacons, corridors and communities; respecting, protecting and enhancing the unique biodiversity and geodiversity of the Black Country and making the most of its assets whilst valuing its local character and industrial legacy.

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 with strong links to the green infrastructure network. Improvements to the national M5 and M6 motorways network and freight railway network will help deliver better connectivity to Regional and National networks.

8. **A sustainable network of community services, particularly high quality lifelong learning, healthcare and sports facilities,** which are easily accessible to all residents at a neighbourhood level, resulting in an increase in levels of qualifications, skills, health and well-being, a decrease in deprivation indicators and improved perception of residential neighbourhoods 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**

4.11 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. Figures 1 & 2, now adopted as part of RSS, set out the broad elements of this strategy.
Figure 1  Spatial Strategy Diagram – Black Country

Figure 2  Prosperity For All – Black Country Inset

The Key Diagram

4.12 The Key Diagram illustrates the preferred spatial strategy for the Black Country Joint Core Strategy at Preferred Options stage. This provides a greater level of detail than Figures 1 and 2 and is supplemented by plans providing further detail 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

The Strategic Centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton are fundamentally important for the strategy to regenerate the Black Country and they should be the focus for large-scale comparison retail, office and leisure investment. By 2026 the four Strategic Centres will have a far stronger role at a regional and sub-regional level, providing:

- 350,000 sq.m. gross new comparison shopping floorspace and 880,000 sq.m. gross new office floorspace
- major new leisure and cultural facilities
- 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
- significantly improved environments that will provide a clear expression of ‘quality of life’

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. These policies 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 up to 2026;
  - 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;
  - To be the principal locations for major cultural, leisure, entertainment and community facilities, providing the widest possible range of such facilities appropriate for their catchments;
  - To provide convenience shopping and local services for the increasing number of residents living within and close to each centre;
  - To offer strong public transport hubs to maximise use of the public transport network by residents, workers and visitors; and
  - 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;
  - Brierley Hill – a new Strategic Centre to accommodate modern investment and regeneration along with public transport improvements;
  - Walsall – a blend of heritage and modern architecture;
  - West Bromwich – in a central location and with potential for major redevelopment; and
  - Wolverhampton - the traditional capital of the Black Country at the heart of the public transport network, with university and administrative functions;
Consultation Responses from Issues and Options Paper

4.13 The consultation responses 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.

4.14 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.

4.15 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.

4.16 Interests linked to each centre tended to support that centre. 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 and there were particular references to gaps in provision in Walsall and West Bromwich.

4.17 Compared to retailers, developers and other commercial interests, 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

4.18 No alternative approaches have been proposed. The chosen approach was developed through the RSS Phase 1 Revision process. The published Revision has established the Strategic Centres in the Black Country as including Brierley Hill in addition to Walsall, West Bromwich and Wolverhampton. It has also identified the need to promote a balanced network of Strategic Centres to underpin the regeneration of the area. This approach is also being carried forward in the RSS Phase 2 Revision, which has now been submitted to the Secretary of State. This states that centres in the Major Urban Areas, including
Brierley Hill, Walsall, West Bromwich and Wolverhampton, “have a key role to play in achieving Urban Renaissance and should be priorities for investment to support this, particularly in the Black Country in line with the strategy for that area” (para. 7.57a)

**Sustainability Appraisal**

4.19 There are many positive sustainability effects arising from concentrating development in the Strategic Centres especially for activities that would draw upon wide catchment areas. The approach would support the vitality and viability of the centres themselves and the surrounding inner areas where deprivation tends to be concentrated. The Strategic Centres are also the focus of the area’s transport networks and the most accessible locations by public transport, so they should best provide all sections of the community with access to comparison shopping, office activities and large scale leisure facilities. Development in the Strategic Centres should also make the best use of existing infrastructure and buildings, including through investment in historic buildings and areas.

4.20 Promotion of the distinctive strengths and unique opportunities provided by each Strategic Centre should will help to encourage investment although there will be a need to ensure each of the centres should get its share of development.

4.21 Development of the Strategic Centres should be complemented by appropriate investment in smaller town, district and local centres and in local facilities to ensure needs are met at an appropriate level to minimise the need to travel and to support local communities.
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:

• 1,400 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
• 37,000 – 37,890 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 densities²
• 1,020 – 1,050 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:
  o The most extensive areas of redevelopment and regeneration in the Black Country up to 2026;
  o To provide a sustainable mix of modern, high quality employment land and new residential communities well supported by community services and local shops, set within and linked by comprehensive networks of attractive green infrastructure and cycling and pedestrian routes;
  o 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;
  o 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
• 2,790 – 3,680 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 for employment / allocation for housing to be applied when preparing Site 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**

4.22 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.

4.23 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.

4.24 The Issues and Options Report identified 1,250 ha of employment land as existing (600 ha) or potential (650 ha) high quality and both spatial options involved improvement and protection of these core employment areas. A dependency on sites outside the Black Country to make up a shortfall of high quality employment land was identified, and some consultees expressed concern about this. However, a more refined definition of high quality employment land has been developed in the light of Issues and Options consultation responses. This, and further technical work (see Core Policy Area 36 – Provision of High Quality Employment Land), has resulted in an increase in the amount of employment land defined as high quality to 1,415 ha. This, and committed high quality employment land to the north of Wolverhampton, is broadly sufficient to meet the identified need of 1,200-1,400 ha for manufacturing, logistics and automotive sectors. At this stage, we do not anticipate there to be a pressing need for additional allocations on the edge of the Black Country, though there may be a longer term need possibly to meet the needs of particular uses such as very large scale distribution. This position will be subject to on-going monitoring.

4.25 However, only 415 ha of the 1,415 ha is currently high quality. 1,000 ha has the potential to become high quality by 2026, subject to improvements ranging from minimal environmental enhancements to major new access points and wholesale, long-term redevelopment. Achieving improvement across such an
extensive area of employment land will be a considerable challenge and require a well-resourced partnership approach.

4.26 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.

4.27 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 (1,195 – 1,250 ha) across the Black Country, than in the Issues and Options Report (1,300-1,500 ha), this is supported by the employment technical work. This quantity of local employment land is considered necessary to provide sufficient land associated with the restructuring of the employment land stock, and to accommodate the majority of needs for non-manufacturing and logistics activity that is unlikely to be appropriate in high quality locations.

4.28 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

4.29 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.

4.30 The key alternative put forward was sustainable urban extensions involving release of green belt land for housing. 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.
Some respondents put forward proposals for green field sites. However, the release of large green field sites for housing does not accord with the RSS spatial strategy for the Black Country.

**Sustainability Appraisal**

There are many positive sustainability benefits, in terms of environment and social inclusion, in concentrating housing development at high densities in the parts of the Black Country which are most accessible by public transport. The creation of strong links to nearby areas will help improve community cohesion, facilitate a network of centres and spread regeneration benefits. Enhanced walking and cycling networks and adequate provision of new and improved services and facilities to meet the needs of growing local residential populations will also have positive effects.

Concentrating high quality employment land within easy reach of the motorway network has the potential to promote car use, increase longer distance commuting and stimulate traffic growth, with associated negative environmental, health and greenhouse gas impacts. The SA Report recommends that high quality employment should instead be located near public transport networks and rail freight facilities. However, the Issues & Options consultation highlighted motorway access as a key criterion in the definition of high quality employment land. Making the most of such locations is critical to achievement of the Black Country’s economic strategy. Proximity to rail freight is covered in Chapter 6.

**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, setting out broad areas proposed for land use change and accompanied by explanatory text. 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. Table 1 provides a summary of the main proposals for each Regeneration Corridor (detailed land use figures are set out in Appendix 2: Table 1). 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 1  Summary of Main Proposals for Regeneration Corridors and Free-Standing Employment Sites

<table>
<thead>
<tr>
<th>Regeneration Corridor</th>
<th>Typology</th>
<th>Preferred Option (for uncommitted employment land)</th>
</tr>
</thead>
<tbody>
<tr>
<td>RC1: Pendeford / Fordhouses</td>
<td>Employment – led (100% - all high quality)</td>
<td>Not applicable</td>
</tr>
<tr>
<td>RC2: Stafford Road</td>
<td>Employment – led (61% – majority high quality)</td>
<td>Mostly Option 2</td>
</tr>
<tr>
<td>RC3: South of Wolverhampton City Centre</td>
<td>Housing – led (50%)</td>
<td>Mostly Option 2</td>
</tr>
<tr>
<td>RC4: Wolverhampton – Bilston</td>
<td>Employment – led (54% - majority local)</td>
<td>Not yet determined</td>
</tr>
<tr>
<td>RC5: Loxdale-Moxley</td>
<td>Employment – led (100% - all high quality)</td>
<td>Not applicable</td>
</tr>
<tr>
<td>RC6: Wednesfield – Willenhall – Darlaston</td>
<td>Employment – led (81-87% - majority high quality)</td>
<td>Not yet determined</td>
</tr>
<tr>
<td>RC7: Bloxwich – Birchills – Bescot</td>
<td>Employment – led (78% - majority local)</td>
<td>Mostly Option 1</td>
</tr>
<tr>
<td>RC8: Hill Top</td>
<td>Employment – led (60-67% - majority high quality)</td>
<td>Mostly Option 1</td>
</tr>
<tr>
<td>RC9: Tipton – Dudley Port – Brades Village</td>
<td>Housing – led (79%)</td>
<td>Option 2</td>
</tr>
<tr>
<td>RC10: Pensnett – Kingswinford</td>
<td>Employment – led (87% - majority high quality)</td>
<td>Option 2</td>
</tr>
<tr>
<td>RC11: (North) Dudley – Brierley Hill</td>
<td>Employment – led (75% - majority high quality)</td>
<td>Option 1 / 2 Mix (Option 1 near town centres)</td>
</tr>
<tr>
<td>RC11: (South) Brierley Hill – Stourbridge</td>
<td>Housing – led (75%)</td>
<td>Option 1 / 2 Mix (Option 1 near town centres)</td>
</tr>
<tr>
<td>RC12: Oldbury – West Bromwich – Smethwick</td>
<td>Employment – led (82% - majority high quality)</td>
<td>Option 1</td>
</tr>
<tr>
<td>RC13: Rowley Regis – Jewellery Line</td>
<td>Housing – led (54%)</td>
<td>Mostly Option 1</td>
</tr>
<tr>
<td>RC14: Coombs Wood – Halesowen</td>
<td>Employment – led (88% - majority high quality)</td>
<td>Mostly Option 2 (Option 1 near town centres)</td>
</tr>
<tr>
<td>RC15: Brownhills</td>
<td>Employment-led (85% - all local employment)</td>
<td>Option 1 / 2 Mix</td>
</tr>
<tr>
<td>RC16: Coseley – Tipton – Princes End</td>
<td>Housing – led (63%)</td>
<td>Mostly Option 1</td>
</tr>
<tr>
<td>Aldridge Free-standing Employment Sites</td>
<td>Employment – led (100% - all local employment)</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Other Free-standing Employment Sites</td>
<td>Housing – led (56 – 72%)</td>
<td>Not yet determined</td>
</tr>
</tbody>
</table>

4.36 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)

4.37 Brownhills does not fall within the Growth or Employment Land Investment Corridors shown in Figure 1. 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).

4.38 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 proposed approach towards this area is 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

4.39 For most of the Regeneration Corridors, a preferred spatial option has been selected (see Table 1). In some cases this is wholly Option 1 or Option 2, in others a mix. In each case, the preferred option has been selected because it is most compatible with the spatial objectives, the guiding sustainability principles and the proposed policies set out in CSPA2, 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. A single preferred spatial strategy has also been proposed for Brierley Hill and Walsall Strategic Centres. Detailed reasons for selection of the preferred option and rejection of any alternative options, where these are judged to exist, are set out in Appendix 2.

4.40 However, for three areas, 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 option to feed into the submission Core Strategy.

4.41 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.

4.42 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.
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.

4.43 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. At one extreme (if Option 2 is chosen for both RC4 and RC6), equal amounts of moderate and high density housing would be provided across all Regeneration Corridors by 2026. At the other extreme (if Option 1 is chosen for both RC3 and RC6), one third of new housing would be moderate density 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 A, Option B or Option C?

Before answering these questions please refer to Appendix 2 for details of each spatial option and to Core Policy Area 9 for evidence of the types of households likely to need new housing.

Question - For all other Regeneration Corridors and Strategic Centres, do you agree that the Preferred Option selected will effectively deliver the Vision and Spatial Objectives?
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 easy access to the countryside 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 (as shown on the Key Diagram):
  - 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, including to serve housing development within the Regeneration Corridors where appropriate
- The broad approach to be taken to development in other areas – prioritise brownfield and locations most accessible by public transport; avoidance of flood risk areas
- Approach required to deliver particular sub-regional scale developments e.g. sports beacons located outside Strategic Centres and Regeneration Corridors

Consultation Responses from Issues and Options Paper

4.44 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 Chapter 6. Green Belt is covered above under Core Spatial Policy Area 2 – Spatial Options Considered but Rejected.

Sustainability Appraisal

4.45 Improved sub-regional green infrastructure networks linked with protected Green Belt at the edge of the conurbation will support health and wellbeing and be important for biodiversity networks. Proposed approaches towards High Quality
Residential Areas and Housing Market Intervention Areas will help to provide a high quality and broad range of housing. Focussing development in the most accessible locations, alongside developing a strong network of centres and community facilities and facilitating strong links to the Regeneration Corridors will also support social inclusion. Avoidance of flood risk areas will help the sub-region adapt to the likely effects of climate change and the prioritisation of brownfield development will help bring benefits to soil and water quality (in areas of contaminated land for example) and promote more efficient land use.
5. Delivery and Monitoring: Implementing the Spatial Strategy

5.1 This chapter will describe how the 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 works required to implement the Preferred Spatial Strategy. The demands on infrastructure will be both challenging and unique, and will be concentrated in the Strategic Centres and certain Regeneration Corridors.

5.2 As set out in the Issues and Options Report, effective joint working between a range of public and private sector delivery agencies is essential to effectively deliver the strategy. Current areas of partnership working are:

- **Brierley Hill Partnership**: Production of the Brierley Hill AAP
- **Black Country Consortium**: Delivery Plan Framework and prospectus and Environmental Infrastructure Guidance
- **Advantage West Midlands**: Through the Regeneration Zone Implementation Plan
- **English Partnerships**: Through the development of a brownfield land action plan
- **Urban Living**: Through Housing Market Intervention in Smethwick and West Bromwich
- **Evolve**: Through promoting housing renewal in Housing Market Intervention Areas 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 Walsall town centre and surrounding areas and of Darlaston
- **Wolverhampton Development Agency**: Working with Wolverhampton City Council to assist particularly with the regeneration of Wolverhampton City Centre and the Stafford Road Corridor

5.3 The Black Country Local Authorities have submitted a bid for Growth Point Status to the Department of Communities and Local Government. A successful
outcome will increase the chances of the Black Country achieving its housing growth agenda.

5.4 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 Core Strategy and other emerging Development Plan Documents. Pre-application discussions and early negotiation on planning obligation agreements will be encouraged.

Phasing

Core Policy Area 4 – Phasing and Delivery of Housing on Employment Land

The Core Strategy will provide a continuous supply of housing and employment land to meet the needs of the Black Country up to 2026. The phased allocation and release of this land will be consistent with the West Midlands RSS, the sequential approach in PPS3, the suitability and availability of sites across the Black Country and the delivery of sustainable communities.

The phasing of housing development in each Regeneration Corridor and Strategic Centre, as set out in Table 2 of Chapter 6 and Appendix 2, will provide a sufficient supply of land both for housing and employment over the Core Strategy period. The broad locations of areas to be protected for high quality and local employment and areas of employment land to be redeveloped for housing by 2026 are shown on the Key Diagram and the Regeneration Corridor Spatial Plans in Appendix 2.

Although the Core Strategy is based on a housing growth strategy, and we have identified surplus, poorer quality employment land to deliver this growth, this needs to be balanced against the need for economic growth and regeneration. Core Policy Areas 36 and 37 have been developed to protect designated areas of high quality and local employment land from redevelopment to other uses over the Core Strategy period.

We think we also need policies to prevent the inappropriate and premature loss of employment land identified for housing, taking into account amenity and viability issues of neighbouring land-uses, and to ensure that such release is managed to a set timetable, unless subsequent monitoring and review suggests otherwise. For submission stage we will establish more detailed phasing of employment land release for housing for the broad locations within each Regeneration Corridor. We think the criteria to be applied when determining phasing should include:

1. availability / deliverability;
2. maintenance of an employment base that meets the needs of the Black Country overall;
3. avoiding over-concentration of employment land release in particular Regeneration Corridors or areas;
4. the later phasing of areas of currently active and fit for purpose employment uses;
5. co-ordinated provision of appropriate services, infrastructure and environmental enhancement;
6. achieving a comprehensive approach and avoiding piecemeal redevelopment.

The needs of businesses occupying land proposed for housing and other uses will be assessed, to ensure that, wherever possible, they can be relocated.
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 2), with additional potential for the release of free-standing employment sites for housing in sustainable locations. Table 2 (Chapter 6) sets out proposed phasing for housing development in each Strategic Centre and Regeneration Corridor. At submission stage each broad location for housing development within the Regeneration Corridors will be allocated to a phase using the criteria set out above.

Using the Core Strategy as a framework, the four local authorities will begin the production of Site Allocation Documents and Area Action Plans (AAP’s) where necessary to define in more detail the actual sites to be retained for employment and redeveloped for housing and other associated uses. It is important that individual site allocations are made following completion of Strategic Housing Land Availability Assessments (in line with Government guidance), including an assessment of the deliverability and developability of each site. Given the complexity of delivery issues affecting housing sites in the Black Country, it is particularly important that detailed technical work, local consultation, master planning and local phasing programmes are in place to inform allocations.

The Black Country authorities will prioritise this work, to provide certainty to landowners, firms, developers and communities. Site Allocation Documents for the four authorities and a number of AAP’s for areas of change are due to be adopted by 2012. These will cover Brierley Hill, West Bromwich and Wolverhampton Strategic Centres and parts of the Regeneration Corridor network (Tipton, Smethwick, Stafford Road Technology Corridor, Wolverhampton – Bilston Corridor, Stourbridge, Halesowen and Willenhall). Boundaries for current AAP proposals are shown on the detailed plans in Appendix 2.

Our preferred approach to the phased release of employment land for housing is to ensure that the first phase of Site Allocation Documents and Area Action Plans will deliver sufficient housing site allocations for the period 2011-21, and some additional allocations for the period 2021-26, where possible and appropriate. This will ensure a release of sites that will not cause unnecessary blight of employment land across the Black Country. However, in some cases, particularly where developers are putting forward proposals in areas without detailed Local Development Document coverage, masterplans linked to planning applications could be appropriate. These would be expected to adopt a comprehensive approach, making best use of available land and infrastructure, and not prejudicing existing and neighbouring uses.

It may 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 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 guide resource allocation to particular areas and ensure that the delivery of major new developments will not cause too much disruption for new and existing residents and businesses.
Question - Do you agree with the proposed approach to phasing and suggested criteria?

Consultation Responses from Issues and Options Paper

5.10 The majority of respondents felt that as much housing land as possible should be phased for release before 2016. Some felt that phasing would unduly constrain regeneration, whilst others suggested particular areas should be redeveloped first e.g. areas which most detract from environmental quality; sites in town centres; smaller sites. There was support for a phasing approach in line with RSS.

Flexibility in the Supply of Housing Land

5.11 The Preferred Spatial Strategy provides sufficient housing land to meet the RSS Phase 2 submission housing requirements for the Black Country. This represents what the Black Country can deliver subject to levels of infrastructure delivery which will be determined by further work set out within Core Policy Area 5, the costs and viability of which will be assessed in detail through an Infrastructure Study.

5.12 The Core Strategy is essentially a housing growth strategy. In order to reach this level of capacity, we have identified sufficient land to meet our employment land requirements (set out in the Employment Land Review 2008), allowing the release of surplus poorer quality employment land for new housing development.

5.13 In addition to this predicted employment land requirement identified within the Employment Land Review, there is an additional surplus supply of employment land set aside within the early years of the Strategy (up to 2016). This has been retained as a flexible buffer in case the requirements for housing and employment land change over this period of the Core Strategy.

5.14 There is, therefore, flexibility to bring forward additional surplus employment land for housing development in the period up to 2016 to meet any projected increases in housing requirements in the Black Country during that time. However, careful monitoring and review of information is required during this period to ascertain the precise housing and employment land requirements for the second half of the Core Strategy period (2016-26). The production of more detailed Local Development Documents will also provide more information to inform land requirements beyond 2016. This additional information will determine whether further employment land, over and above the levels identified in the Employment Land Review 2008, can be released for housing provision if necessary.

5.15 If monitoring and review show that the competing demands of employment and housing land cannot be accommodated beyond 2016 under the existing strategy, then this would trigger a review of the whole Core Strategy to identify further means of delivering the housing and employment land requirements for the period beyond 2016. If however, monitoring shows that employment land requirements for 2016-26 are not as great as currently anticipated, then a continuation of the existing strategy will allow for further release of employment land for housing purposes.
5.16 Any release of employment land will need to be phased in accordance with proposals and criteria set out in Core Policy Area 4 above and this phasing will also be reviewed regularly.

Infrastructure

Core Policy Area 5 - Provision of Infrastructure

We think we need core policies that ensure sufficient infrastructure is available to serve the scale of development set out by the Preferred Spatial Strategy.

We consider 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 – sewers, electricity, gas, water – to cope with pressure caused by new development and the need to increase renewable energy production
  - Understanding of geotechnical evidence to determine the broad development that would need to be covered
  - Understanding of broad contamination issues across a range of sites to determine likely remediation requirements

- **Delivery of development and investment**
  - Economical viability of development 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

- **Environmental capacity**
  - Capacity of environmental assets to withstand development pressures
  - Ability of assets to contribute to offsetting development pressures
  - Implications for climate change
  - Understanding and implications of the water cycle strategy

5.17 As part of the Core Strategy preparation process, and in the lead up to submission to the Secretary of State, the four Black Country Authorities are commissioning an Infrastructure Study to ensure that the emerging Preferred Spatial Strategy is deliverable and achievable within appropriate timescales. The Study will assess the capacity of existing infrastructure, and set out a list of requirements arising from new development and details of the likely costs. The Study will also identify responsible authorities as delivery agents, assess whether agents are suitably resourced and identify any potential impediments to delivery of the strategy. Active engagement with the utility companies will be required to ensure that areas of significant change and redevelopment can accommodate and be supplied by sufficient supplies and resources to meet current and future demands.
5.18 A Delivery Plan was prepared to support the Black Country Study and the RSS Phase 1 revision. A delivery plan has also been prepared to underpin the RSS Phase 2 submission document. These documents set out a fundamental core of base evidence which can be drawn upon.

5.19 During production of the Core Strategy, the four Authorities have also commissioned technical work on a number of issues, for example, retail assumptions, employment land and housing. This work has helped to shape the document into its current form. Other technical work has progressed in parallel with the Core Strategy preparation process, acting as a check to ensure the strategy does not have unintended consequences e.g. the Strategic Flood Risk Assessment and the Habitats Regulations Assessment (or Appropriate Assessment). The implications of this work will feed into the Infrastructure Study.

Planning Obligations

5.20 The Black Country Local Authorities have for many years required developers to make contributions, including financial payments, to ensure that their proposals do not have a negative impact on the wider community and the environment. This system is referred to as planning obligations, and has been used to secure a wide range of localised community benefits, including highways and public transport improvements, affordable housing, open space and play facilities, education and community facilities and public art.

5.21 The Government has been seeking to establish a better way of increasing investment in the vital infrastructure that growing communities need and recently proposed the introduction of a Community Infrastructure Levy (CIL). The CIL would enable local authorities to seek payments from developers towards a wide range of infrastructure improvements, including sub-regional level infrastructure.

5.22 Planning obligations will have a significant role in the delivery of the Core Strategy, and it is considered that there are a number of broad approaches that could be taken to the issue:

1. A Black Country wide approach could be taken, which sets out consistent requirements for infrastructure across all local authority areas. This would have the advantage of simplicity but would not reflect the local circumstances affecting different parts of the Black Country. For example, there are currently different open space standards for each local authority, based on local needs and requirements.

2. Alternatively, an approach tailored to local conditions could be adopted e.g. a specific “roof tax” for housing built in each Regeneration Corridor. This would be a more complex system, but would ensure infrastructure was appropriately funded and phased to ensure effective delivery.

3. The Core Strategy may also be an opportunity for the pooling of resources across local authority boundaries, whereby the contributions from a number of developments could be used to secure certain necessary infrastructure e.g. metro line extensions; sub-regional sports facilities.
Monitoring Framework

5.23 Monitoring has an important role in the new planning system. The LDF must be continually reviewed and revised to ensure that it is kept up-to-date. The Annual Monitoring Report (AMR) is the main mechanism for reviewing the effectiveness of policies emerging in Local Development Documents, and identifying the need for change. Currently, each local authority produces an AMR in December of each year. Following adoption of the Core Strategy, an additional AMR will be produced jointly by the local authorities to cover Core Strategy indicators.

5.24 A draft Monitoring Framework for the Core Strategy is set out in Appendix 4. The Framework proposes a range of indicators and targets, linked to the policies and options being developed. Each year an updated Framework will be appended to the Core Strategy AMR, incorporating any additional indicators required to monitor new Development Plan Documents (DPD’s).

5.25 The Monitoring Framework will also provide the basis for monitoring the Sustainability impacts of the Core Strategy predicted in the Sustainability Appraisal Report (SA).

5.26 The Monitoring Framework should 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?

5.27 The Framework is divided into the Directions of Change and lists the Sustainability Objectives covered by each proposed Core Policy Area.

5.28 The table sets out, for each indicator, the policies that the indicator relates to, a baseline and a target, the source of the information and the type of indicator: national, local, contextual, sustainability appraisal indicators and those covered in regional returns.

Question - Do you think the indicators and targets listed in Appendix 4 are appropriate? Are any particular indicators missing?
6. Directions of Change

Direction of Change 1: Sustainable Communities

The 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
- Accessible community services and facilities

Core Policy Areas:

- Delivering sustainable housing growth
- The density of new residential development
- 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 accessible transport networks and establish sustainable accessibility standards
- To establish cycling and walking networks

Core Policy Areas

Core Policy Area 6 - 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 provision, through a phased and rolling programme, of land for new housing development within the Regeneration Corridors, appropriate Free-Standing Employment Sites, and within the Strategic Centres to meet our growth aspirations. We will also identify appropriate levels of residential intensification and redevelopment within housing renewal areas and in the non-strategic centres across the Black Country. 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.
6.1 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.

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

6.3 With this in mind the Core Strategy has identified sufficient land to exceed the Black Country minimum housing target of 61,200 by 1835 dwellings (see Tables 1 & 2). The Black Country Local Authorities have submitted a bid for Growth Point Status to the Department of Communities and Local Government based on achievement of this amount of housing growth, which represents a 55% increase over and above adopted RSS housing targets up to 2016.

6.4 In line with national guidance and to take account of considerable delivery issues which particularly affect larger areas, the total housing capacity available on former employment land has been discounted by 15%. This is a relatively low level of discount, given that these areas consist mostly of currently occupied employment land with multiple constraints e.g. major land contamination problems; fragmented land ownership; and the need for large-scale and comprehensive master planning and new residential infrastructure. It is likely that larger areas will take 20 years or more to reach full completion.
6.5 The Back Country land supply is as follows:

<table>
<thead>
<tr>
<th>Table 1: Black Country Net Housing Requirement 2007-26</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dudley</td>
</tr>
<tr>
<td>RSS Phase 2 Requirement 2006 – 2026 (net) Minima</td>
</tr>
<tr>
<td>Net Completions and Conversions 2006/2007 (net)</td>
</tr>
<tr>
<td>Sites under construction as of April 2007</td>
</tr>
<tr>
<td>Sites with Planning Permission as of April 2007</td>
</tr>
<tr>
<td>UDP / Adopted Development Plan Document Allocations as of April 2007</td>
</tr>
<tr>
<td>Reduction to allow for non-implementation of commitments*</td>
</tr>
<tr>
<td>Total completed / committed capacity</td>
</tr>
<tr>
<td>Remaining net housing requirement</td>
</tr>
</tbody>
</table>

* Varies by source and by authority

6.6 A small amount of additional windfall housing capacity is likely to come forward outside the Regeneration Corridors, Free-Standing Employment Sites, Strategic Centres and housing renewal areas. This capacity could be in the form of the redevelopment of obsolete community facilities, small non-conforming employment uses, sites in non-strategic centres and residential intensification, 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

<table>
<thead>
<tr>
<th>Source of Capacity</th>
<th>2007-16</th>
<th>2016-26</th>
<th>2007-26</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Regeneration Corridors</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RC 2</td>
<td>450</td>
<td>930</td>
<td>1380</td>
</tr>
<tr>
<td>RC 3</td>
<td>325</td>
<td>650</td>
<td>975</td>
</tr>
<tr>
<td>RC 4*</td>
<td>600</td>
<td>4000</td>
<td>4600</td>
</tr>
<tr>
<td>RC 6</td>
<td>400</td>
<td>2150</td>
<td>2550</td>
</tr>
<tr>
<td>RC 7</td>
<td>1120</td>
<td>680</td>
<td>1800</td>
</tr>
<tr>
<td>RC 8</td>
<td>2890</td>
<td>3180</td>
<td>6070</td>
</tr>
<tr>
<td>RC 9</td>
<td>2850</td>
<td>3300</td>
<td>6150</td>
</tr>
<tr>
<td>RC 10</td>
<td>150</td>
<td>585</td>
<td>735</td>
</tr>
<tr>
<td>RC 11</td>
<td>2045</td>
<td>3080</td>
<td>5125</td>
</tr>
<tr>
<td>RC 12 (inc. West Bromwich Centre)</td>
<td>1400</td>
<td>2270</td>
<td>3670</td>
</tr>
<tr>
<td>RC 13</td>
<td>2485</td>
<td>4315</td>
<td>6800</td>
</tr>
<tr>
<td>RC 14</td>
<td>100</td>
<td>400</td>
<td>500</td>
</tr>
<tr>
<td>RC 15</td>
<td>100</td>
<td>540</td>
<td>640</td>
</tr>
<tr>
<td>RC 16</td>
<td>830</td>
<td>1705</td>
<td>2535</td>
</tr>
<tr>
<td>Regeneration Corridor Total (constrained by 15%)</td>
<td>13385</td>
<td>23615</td>
<td>37000</td>
</tr>
<tr>
<td><strong>Free-Standing Employment Sites</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Free-Standing Employment Sites Total (constrained by 15%)*</td>
<td>1395</td>
<td>1395</td>
<td>2790</td>
</tr>
<tr>
<td><strong>Strategic Centres</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SC1: Wolverhampton City Centre</td>
<td>400</td>
<td>2000</td>
<td>2400</td>
</tr>
<tr>
<td>SC2: Walsall Town Centre</td>
<td>75</td>
<td>425</td>
<td>500</td>
</tr>
<tr>
<td>SC3: Brierley Hill Town Centre</td>
<td>1500</td>
<td>1500</td>
<td>3000</td>
</tr>
<tr>
<td>Strategic Centre Total</td>
<td>1975</td>
<td>3925</td>
<td>5900</td>
</tr>
<tr>
<td><strong>Housing Demolition Sites</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Estimated Housing Demolitions (2006-26)¹</td>
<td>-11425</td>
<td>-14375</td>
<td>-25800</td>
</tr>
<tr>
<td>Estimated Capacity of Demolition Sites (2006-26)¹</td>
<td>7725</td>
<td>11915</td>
<td>19640</td>
</tr>
<tr>
<td>Estimated net change on Housing Demolition Sites (2006-26)¹</td>
<td>-3700</td>
<td>-2460</td>
<td>-6160</td>
</tr>
<tr>
<td><strong>Total Net Capacity</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>13055</td>
<td>26475</td>
<td>39530</td>
</tr>
</tbody>
</table>

* 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 3: Preferred Spatial Strategy - Housing Capacity (2007-26) by Authority

<table>
<thead>
<tr>
<th>Source</th>
<th>Dudley</th>
<th>Sandwell</th>
<th>Walsall</th>
<th>Wolves</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>RC 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1380</td>
</tr>
<tr>
<td>RC 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>975</td>
</tr>
<tr>
<td>RC 4*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4600</td>
</tr>
<tr>
<td>RC 6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2550</td>
</tr>
<tr>
<td>RC 7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1800</td>
</tr>
<tr>
<td>RC 8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>920</td>
</tr>
<tr>
<td>RC 9</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6150</td>
</tr>
<tr>
<td>RC 10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>735</td>
</tr>
<tr>
<td>RC 11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5125</td>
</tr>
<tr>
<td>RC 12a</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3670</td>
</tr>
<tr>
<td>RC 13</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4770</td>
</tr>
<tr>
<td>RC 14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>500</td>
</tr>
<tr>
<td>RC 15</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>640</td>
</tr>
<tr>
<td>RC 16</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1645</td>
</tr>
</tbody>
</table>

| Regeneration Corridor Total (constrained by 15%) | 7880  | 17540  | 5030   | 5910   | 37000 |
| Free-Standing Employment Sites Total (constrained by 15%) | 230   | 765    | 1530   | 265    | 2790  |
| Strategic Centres | 3000  | 0a     | 500    | 2400   | 5900  |
| Estimated net change on Housing Demolition Sites (2006-26)¹ | 50    | -4635  | -1200  | -375   | -6160 |
| Total net capacity | 11160 | 14310  | 5860   | 8200   | 39530 |
| Completed / committed capacity | 4967  | 7179   | 5503   | 5856   | 23505 |
| Net Completions (2006-26) | 16127 | 21489  | 11363  | 14056  | 63035 |
| Estimated Gross Completions (2006-26) | 22000 | 34355  | 15365  | 17115  | 88835 |

* 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

6.7 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 Core
Strategy period. In addition, there may be opportunities to pursue small open space releases or land exchanges involving open space in line with local PPG17 Open Space Audit and Needs Assessments and the Environmental Infrastructure Guidance. Together, these sources 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**

6.8 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.

6.9 The inclusion of a specific allowance for windfall development as part of the housing land supply was considered but is not required at this stage to accommodate the house building targets. Nonetheless, windfalls traditionally make up a large proportion of housing land supply in the Black Country and may continue to emerge even though the Core Strategy 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 housing and land supply calculations should continue to include windfall allowances where justified in terms of national policy in PPS3.

**Sustainability Appraisal**

6.10 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 CPA18. 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’.

6.11 These issues are being addressed under other Core Policy Areas and also in the detailed work being undertaken for individual Regeneration Corridors.

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

6.13 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 7 – The Density of New Residential 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. We think we need a Core Policy looking for higher density developments of 60 - 75 dph net (average 45 dph gross), while in some areas, for example, in the High Quality Housing Low Density areas of the Black Country as shown on the key diagram around Stourbridge, Tettenhall, Aldridge and Great Barr, there may be a requirement for lower density developments of 40-60 dph net (average 35 dph gross). However, all developments must achieve a minimum 30 dph net unless there are specific areas of important local character, of less than 30 dph net, where higher densities would prejudice that character and require additional protection.

6.14 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

6.15 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

6.16 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

6.17 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.

6.18 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. CPA17 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 CPA17) 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 8 – 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 delivery of this Policy is based on the need to provide a sufficient stock of housing balanced against the sustainability of the existing stock.

6.19 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.

6.20 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.

Consultation Responses from Issues and Options Paper

6.21 The majority of the respondents agree with the extent and location of the Housing Market Intervention Areas shown in the Issues and Options Report. However, they would also like to see smaller, more localised areas considered.

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

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

Policy Options Considered but Rejected

6.24 No policy options have been rejected.

Sustainability Appraisal

6.25 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 19 will also address this issue. Any remaining issues will be addressed in the Submission Core Strategy.

Core Policy Area 9 – 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.

6.26 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.

6.27 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 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 19 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 Core Strategy.

Core Policy Area 10 – 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 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.
Table 4, using information taken from Local Housing Needs Surveys, shows how affordable housing requirements differ across the Black Country.

### Table 4: Existing and Recommended Affordable Housing Requirements

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

* 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.

6.35 It can be seen that the annual unmet need for new affordable housing is 2427 affordable units in the Black Country. This represents nearly half of the estimated gross completions each year up to 2016. 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

   **Disadvantages**
   - It will not reflect the level of need in each local authority
borough a more attractive place to develop than another

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.**

<table>
<thead>
<tr>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directly related to local need</td>
<td>Problems with viability, particularly in those areas associated with high development costs or uncertain market conditions.</td>
</tr>
</tbody>
</table>

**Question** – which of the following options to deliver affordable housing do you think is the most appropriate:

1. Individual Local Authority targets based on the recommendations in the latest Housing Needs Surveys
2. Work towards achieving the target set out in the West Midlands Regional Spatial Strategy Phase 2 Revision Preferred Options Document, currently 26%
3. A common % across the Black Country based on an average of the 4 LAs’ need
4. Locally specific approach to affordable housing targets which identifies different targets for particular locations

**Consultation Responses from Issues and Options Paper**

6.36 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.

6.37 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**

6.38 No policy options have been rejected.

**Sustainability Appraisal**

6.39 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 19 will also address this issue. In relation to social considerations, any affordable housing policy should 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 11 – Promote the Sustainable Location of Community and Sports 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. We think that we need a Core Policy to ensure, where possible, the clustering of complementary facilities in accessible locations such as centres 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 that 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 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.

6.40 ‘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 many cases existing centres will be the most appropriate locations to accommodate built development that would be most accessible by a choice of means of transport and complement other activities. Outside of centres, 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.

6.41 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.

6.42 The network of centres across the Black Country will be important in meeting needs for community facilities as well as for shopping, leisure and offices. The ‘Economic Prosperity’ section contains policy areas not only for the Strategic Centres (which will themselves serve local roles for people living in and around
them) but also for the smaller town centres and for district and local centres (which meet more day to day needs) and for local shops and services.

6.43 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

6.44 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.

6.45 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.

6.46 Cultural, leisure and tourism facilities that are likely to attract large numbers of visitors should in the first instance be clustered within the strategic and other 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.

6.47 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.

6.48 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

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

Sustainability Appraisal

6.50 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 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. We think we need a Core Policy to provide a framework by which public transport will serve our communities and will link them to key services, facilities and opportunities. 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 for a public transport network that adequately serves our local communities
- The requirements of transport services for all members of our communities, including the mobility impaired.
- Common standards for the safe accessing of new developments by public transport, cycling and walking, including for wheelchair users
- 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.

6.51 We will work closely with Centro and transport operators to seek to ensure that the public transport network is appropriate for the nature and scale of development proposed for the Black Country. The criteria developed will have to consider the needs of all users, including people with impaired mobility.

6.52 Accessibility standards will be based on walking distances to and from bus, rail and metro stops. This will take account of the nature of the development and the level of public transport service giving access to the development.

6.53 Transport Assessments are important tools to show that all modes of transport are being encouraged. Criteria requiring the preparation of Transport Assessments for new development will be established taking note of Planning Policy Guidance Note 13 Transport (PPG13) and other guidance. This will be in the form of a framework within which more detailed requirements can be developed in consultation with stakeholders.

Consultation responses from Issues and Options Paper

6.54 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.

6.55 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 Area 13 – Cycling and Walking Networks

Increased cycling and walking is needed if the Black Country is going to establish more sustainable travel habits. To encourage this, we think we need a Core Policy to provide a framework that will 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 this will include:

- Defined walking and cycling networks, which will take account of individual authority’s emerging Right of Way Improvement Plans (RoWIPs)
- Criteria for common designs of cycling and walking networks across the Black Country
- Which areas and facilities will need strong cycling and walking links, including the links to other key transport hubs, nodes and corridors
- Criteria that supports the implementation of cycling and walking facilities as part of new developments.

The issue of design standards for cycling networks was raised at the Examination in Public for the Regional Spatial Strategy Phase 1 review. Black Country cycling networks have been constructed to differing standards. Consultation responses suggest that consistent criteria for the design of cycling facilities are required. Criteria will be investigated.

Networks showing longer distance cycling and walking routes are being developed for inclusion in the submission core strategy.
Consultation responses from Issues and Options Paper

6.61 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.

6.62 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

6.63 No policy options have been rejected

Sustainability Appraisal

6.64 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 Core Strategy will seek 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:

- Ensuring high quality design in all new development
- Protecting and enhancing Local Character and Distinctiveness
- Delivering Environmental Transformation
- Delivering Sustainable and Energy Efficient Construction
- Renewable Energy
- Safeguarding the Black Country’s Minerals Resources
- Maintaining a continued supply of Aggregate Minerals in the Black Country
- Supply of Clay to brickworks
- Energy minerals
- Natural building stone
- Prudent Use of Mineral Resources
Core Policy Areas

Core Policy Area 14 – 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.

We think we need a Core Policy to 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
6.65 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
6.66 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
6.67 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 15 – Protecting and Enhancing Local Character and Distinctiveness

The Core Strategy will protect and enhance local character and distinctiveness. The overarching aim is 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 e.g. in respect of major individual developments or Area Action Plans.

We think we need Core Policies to deliver this approach.

6.68 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.

6.69 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.

6.70 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

6.71 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

6.72 No policy options have been rejected.
**Sustainability Appraisal**

6.73 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 16 – Delivering Environmental Transformation**

We think we need Core 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 preparation and implementation of Environmental Infrastructure Guidance (formerly the Landscape Action Plan).

6.74 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. 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.

6.75 The value of the wider environment to the future growth and prosperity of the Black Country has long been recognised. The guidance in the EIG 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.

6.76 The screening outcome of the Habitats Regulations Assessment on the 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**

6.77 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.

6.78 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**

6.79 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 EIG 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**

6.80 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 EIG needs to be in place for the policy to say more in terms of spatial and quantified aspects.

6.80 The EIG 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 EIG.

6.81 This will be addressed by progressing the EIG to enable it to feed into the submission document of the Core Strategy.
Core Policy Area 17 – 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.

6.81 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.

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

Consultation responses from Issues and Options Paper

6.83 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

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

Sustainability Appraisal

6.85 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 Area 18 – Renewable Energy

The Core Strategy will require all new development above a certain threshold (commercial schemes of over 1000 sq.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.

6.86 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.

6.87 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.

6.88 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
6.88 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
6.89 No policy options have been rejected.

Sustainability Appraisal
6.90 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.

---

Core Policy Area 19 – Safeguarding the Black Country’s Minerals Resources

Mineral resources are vital to the regional and local economy. They provide the essential raw materials needed for building and engineering projects. However, mineral resources are finite and non-renewable and they can only be worked where they naturally occur.

We think we need a Core Policy to identify and safeguard mineral resources of potential economic and social importance to the Black Country and to the wider West Midlands region through the identification of Minerals Safeguarding Areas (MSAs).

The main purpose of MSAs is to alert landowners and developers to the existence of potentially valuable resources so they can be taken into account when new development is proposed. Non mineral development will be permitted in these areas provided that the minerals are extracted prior to development where it is economically viable, practicable and environmentally sustainable to do so. Where prior extraction is not considered feasible, developers will be expected to provide evidence demonstrating this.

6.91 In line with national policy guidance we need to include resources that may become important in the longer-term, as well as resources that are important now. 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 broad extent of MSAs are identified on page **. Due to the complexity of the coal and fireclay deposits it is not possible to show these on the same plan although it is proposed that they should be safeguarded. A plan showing the extent of the coal measures is found on page **.

6.92 The following issues will be taken into account when assessing proposals for non-mineral development within MSAs that do not include prior extraction of mineral resources:

- Evidence that mineral resources are either not present, are of no economic value or have already been extracted as a result of a previous site reclamation scheme or other development;
- Evidence that prior extraction of minerals would significantly affect the financial viability of the proposed development;
- Evidence that the need for the proposed development outweighs the need to avoid sterilisation of the mineral resources present;
- Evidence that prior extraction of minerals is not feasible due to the depth of deposits or because mineral extraction would lead to or exacerbate ground stability;
- Evidence that extraction of minerals would have unacceptable impacts on local communities, businesses or environmental assets."

6.93 Until such time as detailed MSAs are defined, developers will be expected to refer to the technical evidence supporting the Core Strategy (e.g. Black Country Minerals Study 2008) and to check with the relevant mineral planning authority before making an application.

**Question** – Does the suggested approach towards mineral safeguarding strike the right balance between safeguarding mineral resources against needless sterilisation and allowing essential non-mineral development to take place within the Black Country? In particular, what is the appropriate threshold, for example in terms of development site area, numbers of new dwellings or floorspace, for this Policy to be applied?
Consultation Responses from Issues and Options Paper

6.95 There was general support for identifying and having a Black Country wide MSA policy. However there were differing views over the extent to which it would impact on proposed development. Some respondents wanted a policy that required prior extraction for all forms of development with the onus for information gathering on the developer to limit further sterilisation of the mineral resources. Others wanted a more balanced approach that equally considered the requirement for future development in the Black Country.

Policy Options Considered but Rejected

6.96 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.

Sustainability Appraisal

6.97 The policy was generally considered sound as it supports local supply of minerals through trying to avoid sterilisation, safeguards jobs and helps protect and enhance townscape and cultural heritage assets through the supply of locally distinctive building materials. There could be some implications for environmental quality and the SA advised that there should be a presumption against mineral workings in environmentally sensitive areas.

Core Policy Area 20 – Maintaining a Continued Supply of Aggregate Minerals in the Black Country

Almost all building and engineering projects require aggregate minerals. Although the Black Country contributes towards regional requirements for aggregates, reserves are running low.

We therefore think we need a policy setting out how we 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.

6.98 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.

6.99 Of these, only sands and gravels and secondary/recycled aggregates are produced in the Black Country. This policy will therefore address future requirements for primary land-won sands and gravels¹ (secondary/recycled aggregates are addressed in Core Policy 24).

¹ Primary land-won aggregates are virgin materials extracted from quarries.
6.100 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.

6.101 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 this.

6.102 At present, Solihull MBC and Walsall MBC are the only mineral planning authorities that contribute as they are the only authorities with permitted sand and gravel reserves. Historically, Solihull has contributed approximately 90% of the West Midlands Metropolitan area’s sand and gravel supplies.\(^2\)

6.103 However, there is no guarantee that Solihull will continue to provide at their 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.

6.104 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 reserves remaining.\(^3\) 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.

6.105 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. This approach is consistent with the advice in MPS 1 that mineral planning authorities should consider the benefits of extensions to existing mineral workings rather than new sites. 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.

6.106 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

---

\(^2\) Solihull Unitary Development Plan 2006 (paragraph 11.2.5) indicates that in 2001, Solihull provided 91% of the sand and gravel for the West Midlands Metropolitan area, and makes provision for a 7-year sand and gravel landbank within Solihull in line with this, up to and beyond 2011.

\(^3\) A Survey of Current Mineral Reserves in the Black Country: Published Report (March 2007), Scott Wilson
separate development plan documents such as Site Allocation DPDs. The policy will also identify key opportunities and constraints within the Aldridge/Stonnall areas which future proposals for mineral extraction – including extensions to existing quarries - will be expected to address. These 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
- 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 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 Infrastructure Guidance – restoration schemes should contribute positively towards proposals for Biodiversity Enhancement Corridor/Core Strategic Network

6.107 It is also proposed to address the potential future need for ‘borrow pits’. 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 on these projects.

Consultation Responses from Issues and Options Paper

6.108 There were a number of varied comments made that generally related to all mineral workings. One of the main issues was of the impact of extraction on the environment and local communities. Respondents generally favoured supporting the principal of minimising the affects and maximising the benefits, particularly for appropriate after uses. In relation to this, particular importance was given to the consideration of biodiversity, geodiversity and the need to protect groundwater protection zones and surface watercourses in these matters. Other comments stated how the Core Strategy should identify locations within the Black Country where extraction will take place. More specifically, mineral industry representatives considered that there are adequate mineral resources to continue contributing to the regional apportionment, including sand and gravel.

Policy Options Considered but Rejected

6.109 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.
6.110 This policy was generally considered sound on the same basis as Core Policy 19.

Core Policy Area 21 – Supply of Clay to Brickworks

There has been a long tradition within the Black Country of brick making. The remaining brickworks in the area still use locally sourced clays to make bricks. They make an important contribution to the local economy as well as creating natural products that contribute towards local character and distinctiveness (see Core Policy 15).

The demand for bricks is likely to continue and may even increase between now and 2026, given the scale of house building proposed.

We therefore think we need a policy aimed at maintaining a continued 25 year supply of clay to local brickworks where feasible, including the provision of safeguarded areas for storing extracted clay.

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

- Clays from the Etruria Formation (Etruria Marl)
- Fireclay (associated with coal seams)
- Mudstones (associated with other clay deposits)

6.112 Etruria Marl and fireclay are nationally scarce clays. National policy guidance requires mineral planning authorities to safeguard and maintain supplies of such materials and to make provision for stockpiling where necessary. 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. 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.

6.113 There are currently 7 brick works in/adjacent to the Black Country, all but one of which is associated with a clay pit producing Etruria Marl. 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.

6.114 Some works also use clays derived from Mercia Mudstone, which does not occur locally and is therefore imported. Buff clays (fireclays) are also used, and

---

4 This includes one just outside Dudley MBC’s administrative boundary that is associated with a clay pit within the Borough. The exception is a works producing limited quantities of bespoke bricks using small quantities of imported clays supplied by its parent company.
although these occur locally, they are also imported because 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.

6.115 Most of the Black Country’s fireclay resources (which are associated with areas of shallow coal) are sterilised by development. However, extraction of these deposits may be feasible prior to development (see Core Policy 19). The only area likely to have potential for large-scale working of coal and fireclay is in Brownhills, Walsall. Part of this area is covered by a dormant mineral permission for opencast coal extraction at Brownhills Common (Core Policy 22 addresses this).

6.116 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 in future DPDs. It will also identify key opportunities and constraints within the Kingswinford/Pensnett and Stubbers Green/Shelfield areas which future mineral extraction proposals will be expected to address. These are:

- Green Belt location – need to maintain high environmental standards during operations, after-uses restricted to “appropriate” uses only
- 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, Shelfield 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 – In particular, proposals for future clay extraction/brick making in the Kingswinford / Pensnett areas of Dudley should address the potential to transport materials by rail rather than road\(^5\)
- Regeneration Corridor 10: Pensnett / Kingswinford – proposals for clay extraction/restoration should contribute positively towards the strategy for this regeneration corridor (see Appendix 2)
- Urban Park / Environmental Infrastructure Guidance – restoration schemes should contribute positively towards proposals for Biodiversity Enhancement Corridors / Core Strategic Network

6.117 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.

---

\(^5\) There is no scope for transportation of clay or bricks by rail in Walsall as there are no railway lines in the vicinity of the existing brick works or Etruria Marl resources
Consultation Responses from Issues and Options Paper

6.118 There were a number of varied comments made that generally related to all mineral workings. These are summarised in Core Policy 20 under this heading.

More specifically to brick clay, the need to provide permitted reserves for 25 years production on a site by site basis was highlighted as important. Discussions with brick manufacturers have helped clarify the supply situation at each brick works. In addition, a demand and concern was raised about the availability of fireclay for pottery-making as well as brick making.

Policy Options Considered but Rejected

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

Sustainability Appraisal

6.120 This policy was generally considered sound on the same basis as Core Policy 20.

Core Policy Area 22 – Energy Minerals

Although there are extensive coal seams present within the Black Country, there are no opencast coal workings 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.

Most of the Black Country’s coal resources have been sterilised by non-mineral development. The only areas likely to have potential to be worked in the future are areas of open countryside where there is less likelihood that working will impact on residential areas. However, some of these 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 and communities.

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 (see Core Policy 21). However, mineral planning authorities are expected to encourage coal producers to make the best possible use of any fireclay resources present within coal seams, including, where practicable, finding a market for the material (MPS 1). As there is evidence of a local demand for fireclay for brick and pottery making, the Core Strategy will need to address this requirement.

6.121 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 (Core Policy 19). 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. 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 (LNR), 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.

6.122 There is long-standing 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.

6.123 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 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.

6.124 Nevertheless, there are major concerns about the impact of opencast coal extraction on the local environment, communities and about how it might affect the image of the area and the proposals for Regeneration Corridor 15: 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. 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 in accordance with the requirements of the Habitats Directive.

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

- Support the regeneration of the Black Country, including the proposals for Regeneration Corridor 15: Brownhills
- Support the positive transformation of the Black Country environment and implementation of the Urban Park
- Not have an adverse effect on local communities or on the integrity of important environmental assets, including European sites
- Have a clear start and end date for working, and a programme for restoration
- Extract as much fireclay and other clays as possible and arrange for these to be either supplied directly to local users for brick or pottery making, or stockpiled in an appropriate location for future use
- Have fully explored the potential to transport materials by rail or canal

Consultation Responses from Issues and Options Paper

6.126 There were a number of varied comments made that generally related to all mineral workings. These are summarised in Core Policy 20 under this heading.

6.127 Several comments were received specifically on this issue. The need to avoid sterilisation was also seen as important, even for small-scale extraction of coal
and other minerals prior to redevelopment. The York’s Bridge site was put forward as a site for potential future opencast coal working.

**Policy Options Considered but Rejected**
6.128 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**
6.129 The assessment was less clear on this policy due to the ongoing work on the Black Country Minerals Study 2008 in identifying the locations of the coal deposits. The SA favoured a presumption against open case coal mining as this will help protect the environment.

**Core Policy Area 23 – 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 15. 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.

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

- **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 in Willenhall
- **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 in Rushall and Dudley Castle in Dudley Town Centre
- **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.

6.131 In addition to the above, the Black Country Minerals Study 2008 has identified potential resources of natural building stone in the Halesowen and Pedmore areas of Dudley.
6.132 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 Conservation Area Character Appraisal
- Operations are strictly time-limited, with a clear start 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/geodiversity by exploiting opportunities to create wildlife habitats linked to existing wildlife corridors and opportunities to create new geological exposures

Question – Would the extraction of natural building stone from the areas specified above be helpful in providing a source of local building materials for conservation?

Consultation Responses from Issues and Options Paper
6.133 There were a number of varied comments made that generally related to all mineral workings. These are summarised in Core Policy 20 under this heading.

6.134 Respondents also highlighted how the Core Strategy should promote the aspiration for improvement in the overall quality of the sub-region’s natural, built and historic environment. It was put forward that restoration schemes should also take account of using alternatives to primary materials.

Policy Options Considered but Rejected
6.135 A policy covering natural building stone was not originally considered, however following on from further discussions and research it was felt an enabling policy was required.

Sustainability Appraisal
6.136 This element was not assessed as a policy was not previously considered, however the SA comments on other policies that protect and enhance local character and distinctiveness envisages positive effects. The SA considerations on other mineral policies also apply in respect of this.
Core Policy Area 24 – Prudent Use of Mineral Resources

Minerals are a finite resource and need to be carefully used. Therefore, a key objective of the Core Strategy will be to maximise use of alternatives to primary minerals.

We think we need a Core Policy to safeguard existing production sites and identify other locations that may be suitable for the development of new facilities.

It is anticipated that the provision of more permanent production facilities in the Black Country will encourage sustainable construction and promote the recovery and re-use of construction, demolition and excavation waste and other waste materials, thereby minimising the amount of waste sent to landfill.

In identifying locations suitable for new facilities for producing secondary / recycled aggregates from CD&EW and other materials, we think the following criteria are important:

1. The importance of sustainably transporting materials, particularly locations with existing or potential rail use and road haulage routes that avoid residential areas
2. The possibility to carry out operations within a building or enclosure where it can be screened from residential areas or sensitive uses.
3. the scope to identify sites within the Black Country suitable for the full range of processes required, such as crushing and screening operations carried out in the open, and processing / treatment of contaminated soils.

6.137 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)6. The current aggregates apportionments are to be reviewed as part of the RSS Phase 3 Revision, and may therefore change.

6.138 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. The management of CD&EW will be addressed in this policy rather than in Core Policy 41.

6.139 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. Major development

---

schemes should demonstrate that appropriate use is being made of secondary or recycled sources (see Core Policy Area 24).

6.140 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. However, there are no facilities that handle contaminated soils, and there are no such proposals in the pipeline.

6.141 A national survey\(^7\) of alternatives to primary aggregates carried out in 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.

6.142 A detailed study carried out by the Waste and Resources Action Programme (WRAP)\(^8\) found that the recycling of CD&EW is 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 the Core Strategy will identify locations suitable for the development of such facilities. However, it has been suggested that the Black Country may not be able to accommodate facilities for the bioremediation of soils, since these operations generally take place in the open and are therefore subject to the same restrictions as open windrow composting sites (see Core Policy 42). No suitable sites have been identified anywhere in the Black Country for these types of operation.

6.143 The nature of the recycling process is likely to limit the scope for the development of new 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. Further work needs to be done to identify locations suitable for new facilities for producing secondary/recycled aggregates from CD&EW and other materials.

**Question** – Do you agree with the suggested approach of safeguarding and protecting locations already used for producing aggregates and other minerals from secondary and recycled materials, such as the major facilities referred to above?

**Question** - Are there any other sites or locations in the Black Country that would be suitable for operations carried out in the open, including the processing and treatment of contaminated soils?

### Consultation Responses from Issues and Options Paper

6.144 There was support for reflecting the importance and role that secondary/recycled aggregates have in the Black Country, both now and in the future. It was felt

---


\(^8\) The Sustainable Use of Resources for the Production of Aggregates in England (2006), WRAP
there is a need to manage the locations of existing facilities both in terms of the threat of redevelopment and in terms of restrictions/negative connotations other developments could have. Encouragement was given to transporting materials by rail.

6.145 However there was specific concern expressed about the lack of facilities and suitable locations for sites to process contaminated soils in the Black Country. This was seen as a potential limitation on the regeneration of the area.

**Policy Options Considered but Rejected**

6.146 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.

6.147 Encouraging re-use and recycling of buildings/demolition have also been considered as possible options - see Core Policy 17.

**Sustainability Appraisal**

6.148 This policy will provide positive effects by promoting the use of locally sourced secondary/recycled materials.
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
- A network of vibrant and attractive town, district and local centres across the Black Country; each offering an appropriate choice of facilities
- A sustainable network of community services, particularly lifelong learning, healthcare and sports facilities

Core Policy Areas:

- The importance of the Black Country’s hierarchy of centres for the Regeneration Strategy
- Directing RSS Retail and Office Development Requirements to the Strategic Centres
- The Smaller Town and Large District Centres
- Smaller District Centres and Local Centres
- Meeting Local Needs for Shopping and Services
- Controlling Edge of Centre and Out of Centre Developments
- 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
- Clustering of High Technology Businesses
- Improving Access to the Labour Market
- Addressing the Black Country’s Waste and Resource Management Requirements
- Location of New Waste and Resource Management Facilities
- Waste Disposal
Core Policy Areas

Core Policy Area 25 – 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. The four strategic centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton will be the focus for major investments serving extensive catchment areas, as well as meeting their own more local needs. However, all of the Black Country centres should be the preferred locations for appropriate levels of investment in shopping, leisure and entertainment, culture and office employment to serve their own areas. 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.

To achieve the maximum amount of investment and ensure a sustainable share of this investment across all areas, it will be necessary to identify a hierarchy of centres across the Black Country. It is envisaged that, in terms of the policies of the Core Strategy, the hierarchy of centres in the area can be divided into three basic levels as set out in Table 5, below. These are:

- the strategic centres;
- smaller town (including large district) centres, which would be appropriate for some investment in comparison shopping, offices, leisure and culture;
- centres meeting local needs, the smaller district and local centres.

However, decisions about development proposals should consider not only the centre’s level in the hierarchy but also the role and character of the particular centre.

6.149 We think the hierarchy of centres in the Black Country should be based on the different policy approaches that should be applied to different sizes/types of centre, so a simple hierarchy with three basic levels would be appropriate. We do recognise that within this there is a need for the different characteristics of individual centres to be recognised, so that for example some of the smaller town centres might have some more comparison shopping than others even though the same basic principles would apply to both.

Question – Do you agree with the approach to defining the hierarchy of centres as set out in Table 5. If not, do you have any evidence to suggest a different approach in respect of any particular centre use or uses?
Table 5 – The Hierarchy of Centres in the Black Country

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Dudley</th>
<th>Sandwell</th>
<th>Walsall</th>
<th>Wolverhampton</th>
</tr>
</thead>
<tbody>
<tr>
<td>RSS ‘Strategic’ Centres</td>
<td>- Brierley Hill</td>
<td>- West Bromwich</td>
<td>- Walsall</td>
<td>- Wolverhampton</td>
</tr>
<tr>
<td>Other Town / Large District Centres</td>
<td>- Dudley - Stourbridge - Halesowen - Kingswinford - Lye - Sedgley</td>
<td>- Blackheath - Cradley Heath - Great Bridge - Oldbury - Wednesbury - Cape Hill - Bearwood</td>
<td>- Bloxwich - Brownhills - Aldridge - Willenhall - Darlaston</td>
<td>- Bilston - Wednesfield</td>
</tr>
<tr>
<td>Small District / Local Centres</td>
<td>- Amblecote - Cradley / Windmill Hill - Gornal Wood - Netherton - Pensnett - Quarry Bank - Roseville - Shell Corner - The Stag - Upper Gornal - Wall Heath - Wollaston - Wordsley</td>
<td>- 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</td>
<td>- Caldmore - Stafford Street - Pleck - Pelsall - Leamore - Palfrey - Walsall Wood High St - Rushall - Blakenall - Lane Head - Streetly - Queslelt - Lazy Hill - New Invention - Bentley - Park Hall - Moxley - Fullbrook - 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 - Tumberry Road, Bloxwich</td>
<td>- Stafford Road (Three Tuns) - Cannock Road (Scotlands) - Tettenhall Village - Whitmore Reans/ Avion Centre - Broadway - Bushbury Lane - Showell Circus - Wood End - Stubby Lane - Heathtown Parkfield - Spring Hill - Penn Manor - Upper Penn - Pennfields - Bradmore - Merry Hill - Castlecroft - Finchfield - Tettenhall Wood - Newbridge - Aldersley - Pendeford Park - Fallings Park - Ashmore Park - Compton Village - Warstones Road - Dudley Road / Blakenhall</td>
</tr>
</tbody>
</table>

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

6.151 Within each borough a hierarchy has been developed through work on each authority’s Unitary Development Plan (UDP), which have all been adopted comparatively recently. As far as the smaller town / district centres are concerned, as a result of the RSS Phase 1 Revision, Dudley has been given the status of a non-strategic town centre, although with a special role in respect of tourism, culture and major residential development, whilst Brierley Hill High Street has been included within the designated Brierley Hill Strategic Centre. Otherwise, there have not been significant changes in the character and functions of these centres; none of the centres has grown to take on a strategic role, none has declined to meet purely local needs and none of the smaller 'local' centres has grown to take on a ‘town centre’ role. However, there are differences in the ‘current’ hierarchy of centres between the local authority areas.

- Walsall has a fairly clear-cut hierarchy with one strategic centre, 5 smaller town centres (described as ‘district’ centres in Walsall’s UDP) and then local centres;
- Wolverhampton also has a fairly clear hierarchy, although one of the smaller town centres (Bilston) is rather larger than the other (Wednesfield) whilst distinctions have been drawn between district and local centres at a local level;
- Sandwell contains a variety of centres, although these have not been defined down to the most local level; and
- Besides Brierley Hill, Dudley contains three other town centres that are rather larger than the non-strategic centres in the other boroughs; Dudley town centre and the centres of Stourbridge and Halesowen.

6.152 On the other hand, in the terms of planning policy, whilst it will be important to consider the role and character of individual centres the second tier non-strategic town centres can be distinguished from other smaller centres as it would be right to support them in more than purely local roles through investment in comparison shopping, office and leisure development.

6.153 Generally existing centres require regeneration and they are well-placed to serve future needs. However, the roles of some of the smallest centres are likely to be affected by particular developments and in some areas (especially the Regeneration Corridors) the scale of population growth to be planned for might require new or additional facilities. Thus 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.

6.154 To strengthen the area’s centres, 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.

6.155 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. 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

6.156 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.

6.157 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.

6.158 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.

Policy Options Considered but Rejected

6.159 The strategic centres have been defined through the RSS Phase 1 Revision whilst the Black Country is characterised by its large number of smaller centres, some functioning as town centres whilst others play a local role. National and regional planning policy and the consultation responses are all clear centres should be the focus for investment in town centre uses and this should reflect the scale and the role of the centre concerned.

6.160 The sustainability appraisal work for the Preferred Options identified possible options relating to whether more or less investment was focussed on the strategic centres compared with the non-strategic centres. Concentrating large-scale investment in the strategic centres is important for the strategy to transform the Black Country and the amounts of investment involved have been set through the RSS Phase 1 Revision and reviewed through the RSS Phase 2 Revision. Further concentration of investment would not leave sufficient for investment in the non-strategic centres, contrary to the wishes of local communities. Less investment in the strategic centres and more in the non-strategic centres is not likely to be practically accommodated or be commercially viable in many cases and would tend to dissipate the regeneration strategy. It is considered the approach taken has achieved the best possible balance in the circumstances.

Sustainability Appraisal

6.161 The sustainability appraisal considered positive affects will arise from this policy and it is soundly-based in sustainability terms. As well as supporting the vitality and vibrancy of centres and the surrounding areas (often where the most deprived areas are located), main centres are the most accessible location in the sub-region, in terms of distance travelled, access to public transport links and
walking and cycling routes, although the appraisal needs also to recognise the importance of a hierarchy in meeting needs at the most appropriate scale, so that, for example, local needs can be met locally. Making the fullest possible use of existing buildings will help conserve and rejuvenate buildings, features and areas of historic value, and this will be supported by the Policy Area's premise to protect distinctive assets in each of the centres.

---

**Core Policy Area 26 – Directing the RSS Comparison 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 (Brierley Hill, Walsall, West Bromwich and Wolverhampton) 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. To provide the best balance between managing development and enabling flexibility in individual cases, we think a criteria-based approach will be most appropriate.

- 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 Revision¹ 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. gross for Walsall and 35,000 sq.m. gross for West Bromwich); and
  - B1(a) office floorspace (186,000 sq.m. for each strategic centre).

  - 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 in RSS Phase 1¹ for each strategic centre, would be allowed if all of the following requirements are satisfied:
    - A need for the development to serve that centre’s catchment could be demonstrated;
    - It could be shown that the development proposed would be appropriate to the scale and role of centre and to meet the identified need;
    - It could be demonstrated there would not be an unacceptable impact on the trade and/or investment in any other strategic centre necessary to support the regeneration strategy; and
    - It could be shown the proposal would lead to an overall increase in access to jobs and opportunities for Black Country residents.

Proposals should also comply with the requirements of the RSS Phase 2 Revision.
For the period 2016-2021 any proposal that would exceed the floorspace set out in the RSS Phase 2\textsuperscript{1} revision up to 2021, and was to be implemented before 2021, would need to satisfy the above criteria.

For 2021-2026 any proposal that would be implemented before 2026 and exceed the floorspace identified up to 2026 in RSS Phase 2\textsuperscript{1} would also be required to satisfy the same criteria as those set above.

6.162 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.

1. The floorspace figures may be subject to change, as work continues on the RSS Phase 2 Revision.

The criteria proposed for managing development (need, scale, impact and access) are reactive, concerned with responding to proposals. They do not attempt to actively direct investment between the different centres. We are considering whether or not there should be any policy to try to direct any ‘extra’ investment from a strategic centre that had achieved its ‘share’ of investment to any strategic centre that had not. This might be seen as a positive approach, but on the other hand, it might risk investment being lost from the Black Country.

**Question:** What do you think of such an approach? Do you have any other ideas?

Views on these issues will be fed into work that is currently being undertaken by consultants to provide advice on a way forward.

6.163 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 should be split equally between the four strategic centres. However, the Panel for the RSS Phase 1 Examination said the figures should be reviewed through RSS Phase 2, which has recently made proposals for the amounts of comparison retail and office floorspace up to 2026. The amounts of floorspace proposed for the strategic centres through the RSS Phase 1 and Phase 2 Revisions are set out below in Table 6.
### Table 6 Amounts of Comparison Retail and Office Floorspace Proposed for the Strategic Centres by the RSS Phase 1 and RSS Phase 2 Revisions

<table>
<thead>
<tr>
<th></th>
<th>Comparison Retail Floorspace</th>
<th>Office Floorspace</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>RSS Phase 1 – to 2021</td>
<td>Market Share,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>between the four</td>
</tr>
<tr>
<td></td>
<td></td>
<td>centres</td>
</tr>
<tr>
<td></td>
<td>RSS Phase 2 – to 2021</td>
<td>Market Share,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>between the four</td>
</tr>
<tr>
<td></td>
<td></td>
<td>centres</td>
</tr>
<tr>
<td></td>
<td>RSS Phase 1 – to 2021</td>
<td>Market Share,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>between the four</td>
</tr>
<tr>
<td></td>
<td></td>
<td>centres</td>
</tr>
<tr>
<td></td>
<td>RSS Phase 2 – 2021 to 2026</td>
<td>Market Share,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>between the four</td>
</tr>
<tr>
<td></td>
<td></td>
<td>centres</td>
</tr>
</tbody>
</table>

|                  | WV 54,000 29% 70,000 30,000 28% 186,000 220,000 | WV 54,000 29% 70,000 30,000 28% 186,000 220,000 |
|                  | BRI 51,000 28% 65,000 30,000 28% 186,000 220,000 | BRI 51,000 28% 65,000 30,000 28% 186,000 220,000 |
|                  | WAL 45,000 24% 60,000 25,000 24% 186,000 220,000 | WAL 45,000 24% 60,000 25,000 24% 186,000 220,000 |
|                  | WBS 35,000 19% 45,000 20,000 20% 186,000 220,000 | WBS 35,000 19% 45,000 20,000 20% 186,000 220,000 |
|                  | Non-Strategic Centres 51,000 - - - Nil Nil | Non-Strategic Centres 51,000 - - - Nil Nil |

Source: Regional Spatial Strategy for the West Midlands (January 2008)(including the RSS Phase 1 Revision), & 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 could take up to 51,000 of the 54,000 sq.m. the RSS Phase 1 Revision considered would be needed up to 2021.
- Office figures refer to offices in Use Class B1(a)

6.164 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.

6.165 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 needed for the four centres strategy to be realised.

6.166 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. These factors have led us towards an approach, set out in Core Policy Area 28, above, which requires that any proposals that would exceed the need identified for the particular strategic centre at 2016. 2021 and 2026 should have to satisfy several criteria.
6.167 The RSS Revisions have not set out figures for particular kinds of leisure, entertainment and cultural development. However, planning policy is clear the strategic centres should be the principal locations for leisure, entertainment and cultural facilities, especially for major developments, and the technical work for the RSS Phase 2 Revision points to particular needs for cinema provision in Walsall and West Bromwich. It is considered a policy is required that will reflect these points and will support each centre in offering the widest possible range of leisure and similar facilities and seek to fill any gaps such as in Walsall and West Bromwich. There should 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. We have asked the consultants giving advice on how we might manage comparison retail and office development between the centres to advise on whether we might manage leisure development to fulfil this strategy.

6.168 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

6.169 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.

6.170 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.

Policy Options Considered but Rejected

6.171 The detailed work on the Black Country Study\(^9\) concluded that a strategy based on four strategic centres would be most sustainable and should be the best way to pursue regeneration across the whole of the Black Country. Subsequently the Black Country authorities agreed to increase the comparison retail market shares of the centres of Walsall and West Bromwich to promote their regeneration. The sustainability appraisal points out that if it were not ensured all centres could get their share of investment some might lose and regeneration opportunities would not be accessible to all parts of the Black Country.

6.172 On the other hand, the strategy still reflects that Wolverhampton and Brierley Hill will remain larger centres in terms of comparison retailing. To try to balance new retail investment equally between the four centres would not reflect the catchment areas of the different centres and would ignore market realities, including the scale of the existing commitment for major shopping and leisure

\(^9\) Study of Black Country Centres, GVA Grimley and Roger Tym & Partners (August 2005)
development in the centre of Wolverhampton. On the other hand, for office development (which is not so dependent upon localised catchments) it has been agreed to share new investment equally between the four strategic centres.

Sustainability Appraisal

6.173 This Policy Area is considered to be sound with positive effects. The policy area acknowledges the disparity between investment and potential investment in the relatively weaker centres of West Bromwich and Walsall, and Brierley Hill and Wolverhampton. This will help ensure that West Bromwich and Walsall will receive the investment and development required for their regeneration agendas.

Core Policy Area 27 – 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, with 20 centres across the area, should help to meet needs in the most accessible and sustainable way. Development for retail, office, entertainment and leisure proposals will be permitted where they are of an appropriate scale that reflects the scale and role of the town centres.

On the basis there would be a requirement for about 100,000 sq.m. gross floorspace up to 2026 it is envisaged the policy for comparison shopping development in the smaller town centres should identify an appropriate amount of additional floorspace for each centre. Developments that individually or cumulatively exceeded the centre’s ‘share’ would be allowed provided:

- A need for the development to serve that centre’s catchment could be demonstrated; and
- It could be shown that the development proposed would be appropriate to the scale and role of centre and to meet the identified need; and
- It could be demonstrated there would not be an unacceptable impact on the trade and/or investment in any other strategic centre or other town or large district centre; and
- It could be shown the proposal would lead to an increase in access to jobs and opportunities to benefit a particular area of deprivation.

The smaller town and large district centres should also provide for convenience shopping, including to serve the housing growth planned for their catchment areas.

It is considered up to 5,000 sq.m. of office (B1a) development should be allowed in each of the smaller town and district centres up to 2026.

It will also be appropriate for the smaller town and district centres generally to provide entertainment, leisure and cultural facilities of an appropriate scale and kind to serve their roles and catchments. In doing this it will be important to recognise the special role the RSS Phase 1 Revision gives to Dudley town centre, as well as the distinctive assets offered by individual centres.
The large number of smaller town centres across the Black Country are important to its character and community identity. However, the comparison shopping roles of these centres 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 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. On this basis it proposed 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. gross. This would have to be distributed between the 20 small town / large district centres on the basis of the role / character and catchment of each of these centres and the amounts of housing development to be proposed locally as a result of work on this Core Strategy. The scale and management of such development is presently being examined by consultants commissioned to look at comparison shopping requirements.

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.

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. In this context, it is considered 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.

As far as leisure, entertainment and culture are concerned, it is considered 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 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 would 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.

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 the 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.
Consultation Responses from Issues and Options Paper

6.178 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.

6.179 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 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 already 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.

6.180 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.

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

Policy Options Considered but Rejected

6.182 Options relating to whether there should be more or less investment in these centres compared with the strategic centres are discussed under Core Policy Area 25 on the hierarchy of centres.

Sustainability Appraisal

6.183 The appraisal considers this policy area, by recognising the importance of the network of 20 centres across the Black Country for local needs, should support community cohesion and social inclusion, as well as accessibility to key services. It is also considered the development proposals should be supported by provision for high quality design, public realm and environmental improvements and safety and security. Of course, the policies of the plan make all of the centres across the Black Country the focal points for positive improvements and high standards.
Core Policy Area 28 – Smaller District Centres and Local Centres

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 far as convenience shopping is concerned it is considered in the small district centres it would be appropriate to allow developments of up to 1,000 sq.m. gross, whilst in the local centres developments should generally be up to 400 sq.m. gross. Developments for comparison shopping, offices or leisure uses of less than 200 sq.m. gross, might be considered appropriate in these smaller centres.

Developments above these thresholds or which would be on the edge of, rather than within, one of these centres could be allowed if a number of criteria are met:

- A particular need for the development to serve that centre’s catchment, and which could not be accommodated within the boundary of the centre could be demonstrated; and

- It could be shown the development proposed would be appropriate to the scale and role of centre and to meet the identified need and could not be served by investment in a larger centre; and

- It could be demonstrated there would not be an unacceptable impact on the trade and/or investment in any other centre and

- It could be shown the development would be accessible by a choice of means of transport from the catchment area it is intended to serve.

These criteria could also be used to consider the designation of new district or local centres where this is required as a result of housing growth.

6.184 As shown in the Hierarchy of Centres Table 5 on page 79, a large number of locations across the Black Country are designated at present as small ‘district’ 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 for ethnic minorities (for example at Smethwick High Street in Sandwell, Caldmore in Walsall and Dudley Road in Wolverhampton).

6.185 Generally, new developments should be of a scale and kind to serve the centres and catchments concerned. Thus, for smaller centres developments should be smaller than in the non-strategic town centres and the emphasis should be on local needs. It should be ensured convenience shopping developments would be in scale with the centres, whilst only modest amounts of comparison shopping, office and leisure might be considered appropriate11.

---

11 200 sq.m. gross 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.
Presently it is considered convenience shopping developments of up to 1,000 sq.m. gross should be supported in the smaller district centres and of up to 400 sq.m. gross in the local centres. However, we would like your views.

**Question:** Is there justification for distinguishing between the district and local centres in this way?

6.186 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 to be allowed if a number of criteria are met.

6.187 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**

6.188 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.

6.189 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**

6.190 The large number of small centres is a distinctive feature of the Black Country. These centres are valued by the community and offer opportunities to meet local needs locally, although in many cases the potential for investment is limited. Planning policy is clear that investment should be appropriate to the scale and role of each centre. To depart from this and seek either large scale investment or no investment would not meet local needs and would not be sustainable in transport or social inclusion terms.

**Sustainability Appraisal**

6.191 The sustainability appraisal considers local centres should be, by their nature sustainable. They should provide services and facilities for the local community and enable people to live and work in a neighbourhood which provides this variety of high quality services, living in a high quality environment without the constant need to travel to larger centres or out of town supermarkets. However, the appraisal is concerned that developments should be appropriate to the scale and function of small centres and that improvements are put in place to ensure these centres would be attractive to local residents. In doing this they need to be
accessible by a choice of means of transport, rather than drawing car-borne trade.

Core Policy Area 29 – Meeting Local Needs for Shopping and Services

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. Where new facilities are to be considered this should be subject to criteria including that:

- There should be a clearly defined local need;
- 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 by means other than the car would be improved.

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, post offices and local convenience shops) 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, 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

6.196 The sustainability appraisal considers this approach has been supported through the Issues and Options stage and alternatives need not be considered. Not to recognise there might be local needs would lead to them not being met, with adverse impacts on those with limited mobility. On the other hand, allowing out-of-centre developments that would meet more than local needs would be contrary to planning policy and to the regeneration strategy for the Black Country, which is based on investment in centres.

Sustainability Appraisal

6.197 Positive effects will arise from this policy and it will have an important role in creating and maintaining high quality attractive neighbourhoods.

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

We believe there should be a core policy to explain the approach to proposals for edge-of-centre and out–of-centre development to support the regeneration strategy for the Black Country. This is based on positive planning for investment in centres and if there are proposals for edge-of -centre and out-of-centre developments, which are subject to the tests in national policy in PPS6 (‘Planning for Town Centres’) it will be important to reflect that:

- In general terms, whilst the need for centres to be expanded will be considered through this strategy and through Development Plan and other documents where necessary, it is not considered there is a need for out-of-centre development, (except to meet particular local needs, in terms of Core Policy Area 29);

- The location of developments will be considered in relation to the catchment areas they serve rather than within local authority boundaries, and locations should be sought within centres at an appropriate scale to serve the catchment area;

- Potential impacts on centres will need to be assessed on the context of the strategy to regenerate vulnerable centres;

- It will be important to ensure developments are accessible by a choice of means of transport and support both social inclusion and the need to sustain strategic transport links and investment in industry and distribution.

It will be important to acknowledge the issues raised by particular proposals. However, the strategy is to accommodate investment (for more than local needs) in centres and to expand centres where necessary. In this context, it will be important to recognise strong justification would be required for out-of-centre schemes that could otherwise be contrary to the strategy for the regeneration of the Black Country.
6.198 The Core Strategy does not need to repeat the tests on edge-of-centre development set out in Government policy. However, it is important to recognise the context in which the need, scale, impact and accessibility of proposals for retailing, offices, leisure and other town centre uses will be assessed. The regeneration strategy is based upon major investment in the strategic centres whilst there is large number of other centres, from town centres down to local centres. All of these centres can be considered as needing regeneration and are vulnerable to the diversion of trade and or investment. These centres serve a population that is relatively deprived and needs access to an increased range of opportunities. If the regeneration strategy is to be successful it will need major housing growth and in providing for investment in industry and distribution, which will put pressure on land outside of centres.

6.199 Apart from developments to meet local ‘day-to-day’ needs, development outside of centres will need to show there is a clear need that cannot be accommodated within or failing that, on the edge of any appropriate centre, and that there would not be an adverse impact on the strategy to expand and strengthen the Black Country’s centres. National policy and the other policies of this plan should ensure such developments would be accessible to all sections of the community.

6.200 In the circumstances of the Black Country it is considered strong justification will be required for development outside of existing centres and that, whilst centres are to be expanded where necessary, out-of-centre developments will be rare. 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

6.201 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.

6.202 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.

6.203 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.
6.204 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.

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

6.206 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.

**Policy Options Considered but Rejected**

6.207 More out-of-centre development would be contrary to the regeneration strategy for the Black Country. The approach taken to restricting development outside of existing centres goes as far as is considered feasible in terms of Government policy and the likelihood there will be some developments, such as for sports facilities, dual use of school and particular retail and other formats that it may not be possible or desirable to accommodate within centres.

**Sustainability Appraisal**

6.208 The sustainability appraisal has considered out-of-centre developments would be likely to have adverse impacts on vulnerable centres, and the strategy to concentrate economic investment, and increase the need to travel, especially by car, and also. This would be likely to worsen social exclusion and have adverse implications in terms of congestion, the viability of public transport, environmental quality, air quality, noise, people’s health, community safety and greenhouse gas emissions. It has been concerned to see controls on developments outside of centres with explanation of how PPS6 would be applied. Where developments are allowed outside of centres sites should be chosen on the basis of sustainable transport links and links to existing centres.

---

**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. Public transport will be at the heart of these proposals, with the key transport improvements being:

- 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 serving the Black Country, 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.

6.209 The Regional Spatial Strategy Phase 1 Revision identifies Sub-regional transport priorities for investment including:-

• Improved transport networks to facilitate access to the centres of Walsall, West Bromwich, Wolverhampton and Brierley Hill;

• Improved transport networks to facilitate access to the four Employment Land Investment Corridors Black Country North, Central, East and West

6.210 While several transport proposals to achieve these improvements are documented in the West Midlands Local Transport Plan and others appear on the key diagram and corridor diagrams, some transport interventions may need further development.

Consultation responses from Issues and Options Paper
6.211 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.

6.212 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.

6.213 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
6.214 No policy options have been rejected

Sustainability Appraisal
6.215 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.

6.216 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 sub regional criteria for local 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.

6.217 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.

Consultation responses from Issues and Options Paper

6.218 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.

6.219 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

6.220 No policy options have been rejected

Sustainability Appraisal

6.221 The policy area will support efforts to reduce congestion as it recognises the impact that car-parking provision for new development has on traffic growth.
Core Policy Area 33 – Improving the Highway Network

The operation of the highway network needs to be improved to support the growth and long-term viability of the Black Country’s economy whilst limiting the environmental impacts of excessive congestion. The nature and scope of the improvements required will include:

- The location of new or increased highway capacity that improves access to our key employment and commercial areas, and tackles key bottlenecks.
- A framework for improving the management of the network to maximise the efficiency of what we already have for all road users including pedestrians and cyclists.
- Support for 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).

6.221 The West Midlands Local Transport Plan sets out a strategy to make the best of what we have by maximising the capacity of existing highways through a programme of Red Routes, improvements to traffic signal control and low cost measures to tackle particular problems.

6.222 The Highways Agency plan to improve the operation of the M5, M6 and M42 motorway box by implementing Active Traffic Management, a system that uses overhead gantry signing to control traffic and allows the use of the hard shoulder as a traffic lane during peak periods.

Consultation responses from Issues and Options Paper

6.223 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.

6.224 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 but Rejected

6.225 No policy options have been rejected

Sustainability Appraisal

6.226 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. Highw ay 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

To support the Black Country economy, the Core Strategy will facilitate the effective movement of freight on our transport networks to feed our Centres and Employment Areas. In addition to the improvements proposed in Policy CPA33, we think we need a Core Policy that will:

- Identify specific highway improvements needed to improve freight access to our Centres and Key Employment Areas.
- Determine the opportunities to move more freight on the rail and canal networks, including preferred routes and safeguarding land needed for interchange between modes.

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 but 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.

6.231 We have commissioned consultants GVA Grimley and GHK to update the Employment Land Capacity Study undertaken as part of the Black Country Study in 2005. This review 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. It also includes automotive sector and waste storage and processing activities (but not household waste recycling) which tends to take place on industrial land. The extent of the need for manufacturing and logistics activity is set out in the table below:

Table 7 – Employment Land Requirement 2011-26

<table>
<thead>
<tr>
<th>Use Class</th>
<th>2011 (ha)</th>
<th>2016 (ha)</th>
<th>2021 (ha)</th>
<th>2026 (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>manufacturing (B1(b/c) / B2)</td>
<td>750-880</td>
<td>622-729</td>
<td>522-612</td>
<td>442-518</td>
</tr>
<tr>
<td>Logistics (B8)</td>
<td>552-646</td>
<td>564-661</td>
<td>572-671</td>
<td>583-682</td>
</tr>
<tr>
<td>Total</td>
<td>1305-1529</td>
<td>1186-1390</td>
<td>1094-1282</td>
<td>1024-1200</td>
</tr>
</tbody>
</table>

6.232 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 rolling five year reservoir of available new and redeveloped employment land. This will ensure that there is enough land to deal with additional requirements. The reservoir envisaged is 185ha of land for the Black Country and a target of 555ha to 2021.

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

6.233 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**

6.234 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**

6.235 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 are 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 less 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 manufacturing (B1(b), B1(c), B2), logistics (B8) uses in the long term. Use Classes B2 and B8 also include some waste management facilities as set out in Core Policy Area 42. 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’ as proposed in the emerging Phase 2 RSS Review 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.

6.236 We have used the key characteristics listed above to inform the Employment Land Review that updates previous work for the Black Country Study. 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.

6.237 The Employment Land Review identifies some 1,400ha of land within or on the edge of the Black Country that is capable of meeting High Quality Employment Land requirements to 2026. This includes an allowance for sites outside the administrative boundary of the Black Country but which will provide a major source of employment for residents, such as i54 in South Staffordshire. However, of this 1400ha, only around 400ha 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. The Employment Land Capacity Study anticipates that this provision will be sufficient in the short to medium term to accommodate the level of need for manufacturing and logistics floorspace set out in Table 7, and including those waste processing activities that will be appropriate in High Quality Employment Land locations. However, the Employment Land Review suggests that this level of provision may result in a potential minor shortfall in the supply of land for logistics employment activity over the longer term. At this stage, we do not anticipate there to be a pressing need for additional allocations on the edge of the Black Country, though there may be a longer-term need possibly to meet the needs of particular uses such as very large-scale distribution. This position will be subject to on-going monitoring.

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 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

6.238 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**

6.239 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. We will consider this issue in the light of responses to the Preferred Options Report consultation.

**Policy Options Considered but rejected**

6.240 There are no alternative options to this approach

---

**Core Policy Area 37 – Providing and Safeguarding Local Employment Land**

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, and that specific 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 as set out in Core Policy Area 42

We also need to 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

6.241 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. The Employment Land Review shows that the Preferred Options provides some 1200 – 1250 ha of ‘local’ employment land to meet this need. The Employment Land Review suggests that this level of provision may result in a potential minor shortfall in the supply of land for some non-manufacturing and logistics employment activity over the Core Strategy period. However, it is anticipated that the needs of these sectors may be met through the intensification of retained
employment areas, and through additional supply from other, smaller local quality areas. The needs of these sectors will be subject to ongoing monitoring and review.

6.242 We have used these criteria to identify a series of ‘local’ employment areas on the Key Diagram and Regeneration Corridor Maps. Core Policy 4 explains that these areas will be protected from redevelopment to other uses over the Core Strategy period.

**Question** – Do you agree with the approach proposed for ‘local’ employment areas?

**Consultation responses from Issues and Options Paper**

6.243 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.

**Sustainability Appraisal**

6.244 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**

6.245 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 26 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. it is to accommodate uses listed in Core Policy 37

**Consultation Responses from Issues and Options Paper**

6.246 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
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**

6.247 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**

6.248 There are no alternative options to this approach

---

**Core Policy Area 39 – 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 e.g. 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**

6.249 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
6.250 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
6.251 There are no alternative options to this approach

Core Policy Area 40 – 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.

6.252 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.

6.253 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
6.254 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
6.255 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

6.256 We have considered whether or not there should be separate provision of employment land for manufacturing and logistics activity

6.257 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 41 – Addressing the Black Country’s Waste and Resource Management Requirements

The Core Strategy will support the waste and resource management employment sector, which is expected to make an important contribution towards the development of a sustainable Black Country economy. By 2026, we think that the Black Country should have enough capacity to manage an amount of waste equivalent to that arising within the area, and in ways that are consistent with the “waste hierarchy” concept.12

We therefore think we need a Core Policy which recognises the need for modern and efficient facilities which can recover, reprocess and treat material resources, so that as little as possible ends up as “waste” requiring disposal to landfill. Modern resource management and treatment facilities also have the potential to provide a range of technical and traditional employment opportunities.

The Policy will:

- Summarise current waste management capacity in the Black Country and the scope for this to be improved/expanded
- Identify existing key waste management infrastructure that should be retained and protected, insofar as this is possible
- Quantify how much new Municipal waste management capacity will be needed in the Black Country between now and 2026, taking into account the RSS requirements
- Identify the key Municipal waste management infrastructure that each authority needs to develop up to 2026
- Quantify how much new commercial waste and resource management infrastructure will be needed between now and 2026 to enable local businesses to manage their waste in line with the requirements of the emerging RSS
- Identify specific types of commercial waste and resource management infrastructure that need to be developed in the Black Country up to 2026 to address gaps in current provision.

12 The “waste hierarchy” prioritises waste management methods according to their relative impact on the environment. The most effective solution at the top of the hierarchy is considered to be waste prevention, followed by re-use, recycling/composting, energy recovery, and finally, waste disposal at the bottom. For details, see Waste Strategy for England 2007, Defra Figure 1.3 (March 2007).
6.258 The Core Strategy is expected to plan for the management of all types of waste, including Municipal Solid Waste (MSW), commercial and industrial waste (C&IW), construction, demolition and excavation waste (CD&EW) and hazardous wastes. An explanation of the different types of waste is set out in the Waste Background Paper.

6.259 Core Policy 41 focuses mainly on addressing requirements for managing MSW and C&IW. The need for facilities for processing CD&EW and other materials to produce secondary/recycled aggregates is addressed in Core Policy 24.

6.260 The Core Strategy has to manage waste in accordance with targets or “apportionments” set out in the RSS. The waste policies in the current RSS are under review as part of the Phase 2 Revision. New draft policies were published for public consultation in January 2008, and these include the following requirements:

- **Municipal waste:** By 2026, the Black Country should have sufficient Municipal waste capacity to divert at least 630,000 tonnes of waste away from landfill (Policy W2).
- **Commercial and industrial waste:** By 2026, the Black Country should have sufficient commercial waste capacity to divert at least 1,832,000 tonnes of commercial and industrial wastes away from landfill (Policy W2).
- **Treatment gaps:** Recent research undertaken by consultants SLR on behalf of WMRA and AWM has identified “treatment gaps” in various parts of the region where there is a shortfall in the number/type of facilities needed. The RSS Phase 2 Revision identifies a number of settlements within the region where facilities could be developed to address these needs, including Dudley, Sandwell, Walsall and Wolverhampton (Policy W3).
- **Protection of existing facilities:** Authorities should seek to safeguard and/or expand suitable sites with an existing waste management use (including hazardous waste facilities) and should not allow them to be compromised by new development on adjoining land (Policies W5 and W8).
- **Construction and demolition waste:** Authorities should encourage more recycling of construction and demolition waste through maximising on-site recycling and promoting “urban quarries” where materials can be recycled to a high standard, where there is evidence of a need for such facilities. This requirement is addressed in Core Policy 24.
- **Contaminated soils:** The Black Country Core Strategy is specifically required to identify new sites for facilities to store, treat and remediate contaminated soils (Policy W10). This requirement is addressed in Core Policy 24.

6.261 As a starting point, we need to consider the capacity we already have and the extent to which this can be expanded to meet future requirements. We also need to consider whether locations containing existing major facilities should be reserved for waste and resource management uses and protected against changes of use and encroachment from other incompatible uses, insofar as this is possible. At the moment, the authorities’ preferred option would involve retaining and protecting all major waste and resource management facilities,

---

13 It is not possible to control changes of use within the same Use Class unless the original grant of planning permission is subject to a condition restricting the activities that can be carried out on the site. Thus, a facility with an unrestricted B1 or B2 use may lawfully change to any other use falling within that Use Class without needing permission.
including those shown on the Key Diagram and Corridor maps. However, it is acknowledged that the suitability of these locations will need to be assessed against the location criteria in PPS10 and the emerging RSS Phase 2 Revision.

6.262 Some of the proposals for the Regeneration Corridors impact on existing waste facilities. Where changes of use are considered essential to the delivery of the spatial strategy, and it is not feasible to retain an important facility where it is, the Core Strategy will need to explain how and where the capacity to be lost will be replaced. The Core Strategy will also need to address issue of encroachment of “sensitive” uses into locations identified for waste and resource recovery operations, e.g. by defining a minimum “buffer” or distance separation required between potentially “bad neighbour” activities and other uses.

6.263 The number and type of Municipal waste facilities needed still needs to be determined through further discussions with the four Waste Disposal Authorities, who are responsible for managing this waste stream. However, given the cost of developing new infrastructure, the authorities are likely to be seeking to develop a limited number of large facilities in appropriate locations rather than a large number of smaller facilities as some stakeholders have suggested. It is also possible that some authorities will choose to manage Municipal waste outside the Black Country through partnership arrangements with adjoining authorities.

6.264 Although the Black Country has significant commercial waste management capacity, much of this is engaged in metal recycling and car breaking. The facilities currently available are unlikely to be sufficient to meet the needs of Black Country businesses between now and 2026. A recent study commissioned by AWM has identified particular “capacity gaps” in the Black Country, which the Core Strategy will need to address.14 The implications are explained in more detail in the Waste Background Paper. Further technical work - and engagement with AWM and other stakeholders - is needed to determine the extent and nature of the Black Country’s future commercial waste and resource management requirements, and how they may best be addressed through the Core Strategy.

6.265 However, not all of the Black Country resource management needs can necessarily be met within the sub-region and it is unlikely that we can accommodate:

- **Open windrow composting** - this type of facility requires an open location at least 250m away from housing to comply with Environment Agency regulations. They also need to be located close to where the compost will be used, such as on a farm holding. In the Black Country, such facilities could only be developed outside the built-up areas, in the Green Belt. So far, the authorities have been unable to identify any suitable locations.

- **Hazardous waste final disposal sites** - these are landfill facilities that have the right geological conditions to be capable of accommodating hazardous wastes without risk of contaminating soils or groundwater. There are at present no such facilities anywhere in the West Midlands region. However, the emerging RSS Phase 2 Revision proposes the identification of such facilities outside the Major Urban Areas, suggesting that the Black Country does not need to make provision for such facilities (Policy W12).

---

14 Waste – A Future Resource for Business: Developing the evidence base for a targeted market intervention strategy in the West Midlands (forthcoming), SLR for Advantage West Midlands
Question – Is it appropriate to reserve and protect locations already occupied by major waste and resource management facilities for these uses in the long-term? If so, have we identified all of the locations that should be retained and protected on the Key Diagram and Corridor maps?

Consultation responses from Stakeholder Events and Issues and Options Paper
6.266 There was general consensus that the Black Country should seek to manage an amount of waste equivalent to that arising within its own area, in line with regional and national targets. Most people also agreed that waste should be managed more sustainably and moved up the “waste hierarchy.” It was felt that this could be achieved through better co-ordination and unified approaches towards MSW management across the Black Country authorities and other partners.

6.267 There were various comments made in relation to the need to provide specific waste transfer/treatment facilities. For example, there was significant support for the use of waste to generate energy/combined heat and power, and for these facilities to be incorporated into regeneration projects. However, mass burn incineration was not supported. Some stakeholders considered that the Black Country needs a large increase in the number of composting, recycling and transfer facilities and this was supported by local residents who also wanted to see an expansion of existing waste collection services that would deal with a wider range of materials.

6.268 The lack of facilities for small businesses and for managing construction and demolition wastes (including contaminated soils) was seen as an issue as the regeneration of the Black Country will depend on their availability. It was felt that the provision of such facilities 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.

6.269 In general terms it was also felt that the management of waste should minimise impacts on the environment and should avoid areas that are important for biodiversity/geodiversity.

6.270 The negative perception of waste management was acknowledged as a significant barrier to bringing forward new proposals. However, there was also a view that local communities should accept responsibility for managing their waste and recognise the importance of sustainable waste management.

Sustainability Appraisal
6.271 The policy area is broadly sustainable through emphasising that waste is a resource and sets out intentions for managing it. However there is little detail as to how these will be achieved. Further technical work will be carried out to address this issue. The SA assessment has made suggestions that the policy should contain specific provision towards a presumption of protecting environmental quality (including air, water and noise quality), landscape, townscape and biodiversity assets from waste management. It is anticipated that these issues will be addressed within the Submission Document of the Core Strategy.

Policy Options Considered but Rejected
6.272 We feel that there is only one policy option. Stakeholders have considered whether the Core Strategy should plan to manage more waste than arises in the
Black Country. However this was rejected as it was not considered acceptable to local communities to encourage large-scale importation of waste from elsewhere. It was also felt that such a course of action would be unsustainable.

Core Policy 42 – Location of New Waste and Resource Management Facilities

The Core Strategy will direct waste and resource management facilities towards locations where they are compatible with existing/proposed uses and where there is the potential to develop a synergy with other commercial and community developments, for example, where waste can be used to generate energy to serve adjoining developments.

We consider that the overall pattern and distribution of facilities should reflect the overall spatial strategy for the Black Country. We therefore propose to identify employment locations, primarily within the Regeneration Corridors, which can accommodate the market-led waste and resource management facilities likely to be needed in the Black Country between now and 2026.

We also think we need to identify locations or options for specific facilities where a particular need has been identified, for example, where a Waste Disposal Authority has identified a need for a new Municipal waste facility, or where a waste operator has identified a need/demand for a specialised facility.

The preferred location for these facilities is on employment land as defined in the Core Strategy. The identification of specific locations should also not preclude development in other locations if the scale and design are appropriate and a synergy can be demonstrated.

6.273 This Policy Area will set out the broad pattern and distribution of waste and resource management facilities in the Black Country, and will identify locations suitable for the development of different types of facility. It will cover the following types of facility:

- **Recycling** – facilities that recover raw materials for re-use, e.g. “clean” or “dirty” material recovery facilities (MRFs) and re-processors
- **Organic Treatment** – facilities that treat waste using biological processes to convert it into new, potentially useable materials and/or reduce its bulk e.g. open windrow composting and anaerobic digestion
- **Other Treatment** – facilities that treat waste using mechanical or chemical processes to convert it into new, potentially useable materials and/or reduce its bulk, e.g. autoclaving, gasification and pyrolysis and energy from waste
- **Transfer** – facilities that receive and temporarily store waste pending transportation elsewhere for management or treatment, also often include an element of sorting, screening and recovery of waste, e.g. skip hire facilities

6.274 Many of the above processes take place inside buildings and are similar to industrial processes. It is therefore considered appropriate for waste and resource management uses falling within Classes B1 and B2 to be accommodated on either High Quality Employment Land (Core Policy 36) or
Local Employment Land (Core Policy 37). However, processes that take place in the open and/or may cause noise, dust and other potential nuisances are not well suited to a high quality employment location and instead may be accommodated on Local Employment Land. For example, waste transfer operations and any operations involving crushing of hard materials may fall within this category.

6.275 The above locations will need to be capable of accommodating the Black Country’s general Municipal and commercial and industrial waste requirements (as specified in Core Policy 41), as well as unidentified commercially-driven schemes that may come forward between now and 2026. The work undertaken as part of the Employment Land Capacity Study Update (informed by the recent regional study commissioned by AWM) assessed the requirements of waste and resource management facilities. It concluded that the requirements can be met on existing employment land although further work is needed on this to ensure that the amount of employment land is sufficient to meet the Black Country’s future needs and to examine specific requirements.

6.276 The Core Strategy also needs to identify strategic locations for specific proposals aimed at meeting particular requirements e.g. Municipal waste infrastructure or energy from waste plants proposed as part of regeneration projects. Within Regeneration Corridor 8: Hill Top we have already identified a location for a strategic resource recovery park which can accommodate a range of waste and resource management needs, including managing most of Sandwell’s Municipal waste. Stakeholders have also suggested the following locations as being suitable for the development of strategic waste and resource management facilities:

- Lister Road, Dudley
- Tipton / Coseley area, Dudley
- Stourbridge/ Halesowen, Dudley
- Rowley Regis, Sandwell
- Aldridge, Walsall

6.277 These strategic locations do not necessarily have to be within the Regeneration Corridors, but they will be expected to have good transport access, and the proposed operations will be expected to be compatible with the existing or proposed adjoining uses. For such proposals, the Core Policy will need to specify:

- The proposed location
- The waste management requirement to be met
- Details of how the proposal will be implemented and by whom
- Key constraints and opportunities that the development should address, e.g. site constraints, access/highway issues or environmental/amenity issues

6.278 Further work needs to be done to identify the types of facilities needed and the most appropriate locations for them. In identifying such locations, the Black Country authorities will need to undertake further engagement with key stakeholders.

---

15 Waste – A Future Resource for Business: Developing the evidence base for a targeted market intervention strategy in the West Midlands (forthcoming), SLR for Advantage West Midlands

16 A specific site at Bean Road, Tipton (Foxyards Site) has been put forward by Biffa.

17 A specific site adjacent to Edwin Richards Quarry has been put forward by Waste Recycling Group.
stakeholders, including waste operators, on the suitability of the locations under
consideration and the types of facilities that could be developed.

6.279 The authorities are proposing to assess the suitability of locations under
consideration against the following criteria:

- Location Criteria in Annex E of PPS10: Planning for Sustainable Waste
  Management
- RSS Phase 2 Revision Policy W5: Location of New Waste Management
  Facilities

**Question** – Is the suggested approach of identifying general locations for new
market-led waste and resource facilities, and specific locations for new facilities
for which there is a particular local or regional need, sufficiently flexible? Is it
likely to deliver the range of waste and resource management facilities needed in
the Black Country between now and 2026?

**Question** – Are the locations that have been put forward by the authorities and
stakeholders, suitable for the development of strategic waste and resource
management facilities? What types of facilities do you think should be developed
there? If not, why do you think they are unsuitable and can you suggest any
additional/alternative locations?

**Consultation responses from Stakeholder Events and Issues and Options
Paper**

6.280 Stakeholders have indicated a need for a number and “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. There was support for
incorporating sustainable waste management facilities into regeneration projects
(e.g. combined heat and power plants).

6.281 The appropriate location of facilities was seen as important. There is agreement
that waste should be managed as close as possible to its source in accessible
locations to minimise the distance waste has to be transported. Facilities likely to
generate a significant amount of traffic should be located away from residential
areas and high quality employment locations as this is one of the main sources of
conflict. 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.

6.282 Local residents felt there is a need for more household recycling centres (HRCs)
across the Black Country and suggested several sites. They also felt they should
to be able to use facilities in an adjacent Borough if it is nearer. The lack of
accessible facilities for residents was a concern due to the potential
consequences e.g. litter, fly-tipping.

6.283 There is support for the Black Country becoming a “centre of excellence” for
reprocessing and resource management with an “economic cluster” approach in
line with RES priorities suggested as the preferred way forward. This was
particularly the case for MSW and C&I facilities. It was also felt that this would
help with the establishment of certain technologies through co-location of facilities
and economies of scale improvements. There is strong support for the
development of a resource recovery park at Hill Top in Sandwell and other sites
put forward.
Several commercial operators have said they do not want the Core Strategy to specify locations for waste management but would prefer identification of broad areas/types of location considered suitable. However recent Government advice suggests that where a particular need has been identified, Core Strategies will be expected to identify specific/potential locations.

There was general consensus that employment sites were suitable for many types of waste management activity and provide opportunities to link facilities to source of waste. It was recognised as an important issue to ensure enough employment land is retained for these uses and that the facilities should not detract from the attractiveness and viability of these areas. It was also noted that not all facilities can be located in such areas as they have different location requirements. Some concern was expressed at the lack of suitable locations for facilities for the bio-remediation of contaminated soils (see Core Policy 24).

Whilst certain stakeholders did not want waste management facilities located in areas of open space/green belt, other responses acknowledged that composting of green waste might have to take place on open land in the Green Belt or outside the Black Country, particularly due to the Environment Agency’s policy of not permitting open windrow composting within 250m of a residential area. Where facilities created adverse impacts on the environment and local communities, stakeholders wanted these minimised e.g. through screening, and the need for the better control/regulation of these activities was recognised (although the scope of this is outside the scope of the Core Strategy).

Due to the further technical work required to support this policy the SA assessment did not come to firm conclusions. It has made suggestions that the policy should contain specific provision towards a presumption of protecting environmental quality (including air, water and noise quality), landscape, townscape and biodiversity assets from waste management. It is anticipated that these issues will be addressed within the Submission Document of the Core Strategy.

We do not think that we have any realistic option other than to identify a range of locations throughout the Black Country suitable for different types of waste and resource management operation, capable of meeting regional and local requirements.
Core Policy Area 43 – Waste Disposal

Although disposal of waste to landfill is a last resort, it will continue to have a role in the Black Country as the authorities are unlikely to have enough capacity to manage all of their waste up to and beyond 2026 using other methods.

Landfilling can be the most appropriate method of restoring many of the voids left from previous quarrying activities. Landfilling operations can also have long-term benefits in ensuring that voids are restored safely and can be brought back into use for agriculture, recreation, nature conservation or other appropriate uses.

We therefore think we need a policy that acknowledges the role of landfill as a method of disposal for residual waste which cannot be managed in any other way, and as a method of restoring former mineral workings to safe and acceptable standards. It is also proposed that the policy will address the issue of landfill gas generation, ensuring that it is captured for energy wherever possible and must not be vented into the atmosphere where it can add to global warming.

6.289 The emerging RSS Phase 2 Revision adopts a restrictive approach towards landfill. It proposes that plans should only allow landfill where it is necessary to restore degraded land (including former mineral workings), to meet specific local circumstances, where it is supported by evidence of a need for new capacity, and where geological conditions are suitable (Policy W11).

6.290 The Black Country still relies heavily on landfill as a means of disposing of waste, and although this reliance will reduce over time e.g. due to steep increases in Landfill Tax, in the short-term it is likely to continue. In the longer-term, there will always be a need for waste disposal facilities for waste residues that cannot be managed in any other way. Furthermore, existing and projected future landfill capacity in the West Midlands region as a whole may not be sufficient to meet everyone’s needs up to 2026 and not all voids are suitable for landfilling with waste. We therefore consider that the Core Strategy is justified in making provision for new landfill capacity in the Black Country where suitable voids exist and where landfilling is considered an appropriate method of restoration.

6.291 There are at present four operational landfill sites in the Black Country, although one is due to close in March 2008, and two pre-operational sites (permitted sites that have not yet begun operating). The evidence available suggests that the total capacity of the operational and pre-operational sites is around 7.2 million cubic metres.

6.292 In practical terms landfilling offers an appropriate method of restoring many of the voids left from previous quarrying activities, particularly in the case of deep voids created from the extraction of clay. At present, we know that one of the clay quarries in the Black Country is likely to come forward as a new landfill site some time within the next 15 years and that another one may come forward towards

---

18 A Study into Future Landfill Capacity in the West Midlands (May 2007), Scott Wilson for West Midlands Regional Assembly

19 This is based on information obtained from a 2004 Environment Agency survey and information provided with planning applications for restoration schemes.
the end of the plan period. However, it is not possible at present to estimate how much capacity these are likely to provide. We therefore need to do further work to identify the landfill capacity likely to come forward in the longer-term through quarry closures and restoration schemes. The Core Policy will therefore support the use of landfill to restore former mineral workings where appropriate, and where operations comply with the requirements of the minerals Core Policies 22 – 24.

6.293 Former and active landfill sites also have potential to generate energy from landfill gas. As well as providing a source of local energy, this will also help minimise harmful emissions arising from landfill gases which have been identified as one of the contributors towards global warming and climate change. It is therefore proposed that the Core Policy should explain the circumstances where systems will be required to be installed.

6.294 There is also a need to consider whether the Core Strategy should identify locations suitable for ancillary waste disposal facilities, such as long-term storage facilities for waste or waste transfer operations that are mostly handling wastes whose fate is disposal or treatment prior to disposal rather than re-use or recovery.

**Question** - Should the Core Strategy provide for ancillary waste disposal facilities such as those referred to above, and if so, can you suggest any suitable locations for such facilities?

**Consultation responses from Stakeholder Events and Issues and Options Paper**

6.295 Most responses have accepted that there will always be a need for some landfill sites but only to be regarded as a “last resort”. This was despite the recognition of the greater impacts on the environmental, local communities and businesses than other waste management facilities. It was identified that the landfill void figures needed to be checked for consistency.

6.296 The location and impact of landfill was noted as important. It was recognised that landfilling can be the only viable means of restoring deep mineral workings to a safe/beneficial use and that the opportunities for this should maximise bio/geodiversity and be built into schemes at the earliest stage. The significance of groundwater protection areas and associated IPPC permit issues were highlighted and there was support for capturing landfill gas for energy.

6.297 The need for hazardous waste disposal sites was highlighted along with concerns about the safety and need for strict environmental controls although these are matters to do with licensing and management of sites which are outside the scope of the Core Strategy.

**Sustainability Appraisal**

6.298 This Policy Area seeks to specify and plan for the role landfill has in the Black Country. The generation of energy from landfill gas will support the development of this alternative energy source in the sub-region. The policy on landfill should not be written or apply in ways that may inhibit the growth of sustainable waste management in a sub-region, particularly as the Black Country currently suffers from a low recycling rate.
6.299 Land-fill use at former mineral workings will also potentially have negative impacts on landscape, townscape and environmental quality. It can also limit the possibilities from appropriate restoration for biodiversity, geodiversity and green networks. The appropriate restoration of former mineral workings will also need to be addressed in Core Policies 22-24.

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

Policy Options Considered but Rejected

6.301 No options have been considered in relation to waste disposal by landfill. Although it is the “last resort,” PPS10 acknowledges that it must be catered for. There are few, if any, realistic alternative options with regard to where landfill facilities can be located, as this is constrained by the availability of suitable voids, which in most cases will be voids left over from previous mining and quarrying activities.
## Appendix 1: Alignment of Sustainable Community Strategy/Community Plan Objectives/Aims with the Core Strategy

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Developing Brierley Hill as an economic and retail centre for the Black Country, with the three complementary town centres of Dudley, Halesowen and Stourbridge undertaking area action plans to offer a model of urban living and working whilst promoting the built heritage</td>
<td>A network of regenerated, sustainable communities across the Borough, creating an attractive urban living environment, through: • A high quality environment • Improved housing quality and more choice • Sustainable transport infrastructure • Revitalised town centres A rejuvenated West Bromwich as the premier centre for shopping, business and cultural activities</td>
<td>Promote Office corridor in Walsall Town Centre Create vibrant town centre for Walsall; creating environment where people want to live, work, rest and play</td>
<td>W3 Improved infrastructure</td>
</tr>
<tr>
<td>2</td>
<td>Creating an environment to enable existing and new businesses to thrive whilst championing the</td>
<td>A diverse, modern and sustainable Sandwell economy A Borough where local people benefit from local wealth creation, employment and training</td>
<td>Build the foundations for a knowledge economy Taking full advantage of new technology to support businesses, schools and</td>
<td>W1 Raised income levels by ensuring better skills and range of employment</td>
</tr>
</tbody>
</table>

118
<table>
<thead>
<tr>
<th></th>
<th>interests and assets of the borough so as to encourage more business investment</th>
<th>opportunities</th>
<th>communities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>To improve basic skills amongst local people and achieve greater participation in adult and community-based learning</td>
<td>To address the higher-level skills gap across the Borough and attract/retain highly skilled individuals</td>
<td>Support business take up of new technological innovations to retain new innovative businesses</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Create the environment to support creation of new businesses and diversification of existing businesses</td>
</tr>
<tr>
<td>3</td>
<td>A network of regenerated, sustainable communities across the Borough, creating an attractive urban living environment, through: • High quality environment • Improved housing quality and more choice • Sustainable transport infrastructure • Revitalised town centres</td>
<td>CN1 Improved quality of life with services better meeting the needs of people in their communities and neighbourhood</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>To promote community cohesion. Safer, cleaner, stronger communities</td>
<td>Increase range, diversity and accessibility of housing and affordability</td>
<td>CN1 Improved quality of life with services better meeting the needs of people in their communities and neighbourhood</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Developing Brierley Hill as an economic and retail centre for the Black Country, with the three complementary town centres of Dudley, Halesowen and Stourbridge undertaking area action plans to offer a model of urban living and working whilst promoting the built heritage</td>
<td>A network of regenerated, sustainable communities across the Borough, creating an attractive urban living environment, through: • A high quality environment • Improved housing quality and more choice • Sustainable transport infrastructure • Revitalised town centres</td>
<td>Improve centres across the borough to strengthen the economy and health of every community (Housing led regeneration)</td>
</tr>
<tr>
<td>6</td>
<td>Ensuring that Dudley develops as a sub-regional focus for leisure and tourism activity building on existing leisure attractions within the centre Improving the parks and open spaces of the borough through</td>
<td>To achieve cleaner, safer and greener streets and public spaces; Safer, cleaner, stronger communities A network of regenerated, sustainable communities across the Borough, creating an attractive urban living environment, through: • A high quality environment • Improved housing quality and more</td>
<td>Cleaner, greener and safe open spaces</td>
</tr>
<tr>
<td>7</td>
<td>A network of regenerated, sustainable communities across the Borough, creating an attractive urban living environment, through: • A high quality environment • Improved housing quality and more choice</td>
<td>Deliver high levels of accessibility and improve the management of road and public transport networks</td>
<td>W3 Improved infrastructure</td>
</tr>
</tbody>
</table>
| 8 | Creating opportunities for local people to gain well-paid employment in the Borough by equipping residents with the necessary skills and encouraging employers to invest in employee development. | Improve educational attainment  
To reduce the gap between good health and poor health in different areas by targeting disadvantaged groups and neighbourhoods.  
*Have greater access to services and choice about the services they receive* | Improving quality of life of the people of Walsall; in particularly through tackling crime and safety and improving health through providing excellent facilities throughout the borough.  
Ensure cultural and leisure provision meet the standards that communities deserve  
Use sport and leisure to challenge the activity levels of our residents and enhance their quality of life and health. | H1 Improved health & well-being, and reduced health and social care inequalities with particular emphasis on targeting Priority Neighbourhood.  
L3 More people engaged in learning for personal fulfilment, development and enjoyment across the City. |
| 9 | A sustainable environment which is protected and enhanced through:  
• Efficient use of energy and natural resources |  | **G3** Improved sustainability in consumption, production and management of waste |

for children and young people and encouraging their participation in healthy, purposeful cultural activities
Appendix 3 - Technical Evidence

This is a list of the technical evidence that has been used as part of the development of the Core Strategy. Much of this evidence can be found on the Black Country Core Strategy web-site, or by contacting one of the four local authorities. The contact details can be found in Chapter 2 of the document.

Regional Policy Guidance

- West Midlands Regional Spatial Strategy (2004)
- Regional Sustainable Development Framework
- Regional Economic Strategy (Advantage West Midlands 2004)
- West Midlands Regional Energy Strategy (WMRA 2004)
- Regional Housing Strategy
- Regional Homelessness Strategy WMPA 2005
- West Midlands Cultural Strategy
- Report of the Panel into Draft Phase One Revision (March 2007)
- West Midlands Regional Spatial Strategy, Phase 1 Revision, The Black Country

Black Country Plans, Studies and Guidance

- Black Country Study
- Black Country Study Population and Household Scenario Forecasts 2001-2031 (Mott McDonald September 2004)

Housing

- Black Country Urban Housing Capacity Study (Halcrow Group in association Bruton Knowles September 2005)
- Black Country Telford Housing Market Renewal Area Phase 1 (ECOTEC September 2005)
- Black Country and Telford Housing Market Renewal Area - Phase 2 (ECOTEC April 2006)
- Black Country Housing Market Thinkpiece - (CSR Partnership June 2004)
- Black Country Study Population and Household Scenario Forecasts 2001-2031: (Mott McDonald December 04)
- Black Country and Telford New Build Survey 2005/06 - (CSR Partnership March 2006)
- Form, Function and Trajectory of neighbourhoods in the Black Country and Telford, Draft Report (CSR Partnership April 2006)
- Regional Housing Land Potential Study 2007
- Black Country Gypsy and Travellers Accommodation Assessment, Fordham Research, 2007
West Midlands C3 Area Housing Market Assessment – currently underway.
Black Country Local Authorities’ Housing Needs Surveys
Black Country Local Authorities’ 5 Year Supply and Strategic Housing Land Availability Assessments

Economy and Skills
- Comparison of Forecasts for the West Midlands Region - (WM Enterprise Consultants February 2005)
- Floorspace Requirements & Land Density Assumptions West Midlands Region - (WM Enterprise Consultants March 2005)
- Diversification and Modernisation Strategy for the Black Country - (SQW Ltd Dec 2003)
- The Black Country Incubation Strategy - (SQW April 2005)
- Accommodating Technology & Service Related Companies in the Black Country - (Bucknall Austin, Clarke Monck & Associates Sep 2005)
- Black Country Employment Land Capacity Study (GVA Grimley Sept 2005 Final)
- Black Country Employment Land Capacity Study (GVA Grimley Sept 05 Exec Summary)
- Black Country Employment Land Capacity Study (GVA Grimley Sept 2005 Appendices)
- Long Term Economic and Employment Strategy for the Black Country (GHK)
- Black Country Employment Land Capacity Study (GVA Grimley), including review undertaken for JCS
- Accommodating Technology and service Related Companies in the Black Country (Bucknall Austin)
- Logistics Technical Report (J Lillywhite)
- Black Country Technical Park Study (Thomas Lister)

Transport
- Black Country Transport Strategy (PRISM -May 2006)
- Transport Investment Project Prioritisation: Connecting the Black Country - (Carlbro May 2006)
- Black Country Study (Prism - Joint Application Team November 2005)
- Black Country Study (PRISM June 2006)
- Transport Investment Project Prioritisation - Connecting the Black Country - (Carlbro June 2006)
- The Transport Delivery Plan 2007 (WMRA-Spring 2007)
- The Regional Freight Strategy (WMRA-Spring 2007)

Centres
- Study of the Black Country Centres - (GVA Grimley August 2005)
Investment Analysis & Future Investment Potential of the BC Retail Centres-
(Chase & Partners Mar 2006)
Chase & Partners Report Appendix 1 - Wolverhampton
Chase & Partners Report Appendix 2 - Walsall
Chase & Partners Report Appendix 3 - West Bromwich
Chase & Partners Report Appendix 4 - Dudley
Chase & Partners Report Appendix 5 - Study of the Black Country Centres
Chase & Partners Report Appendix 6 - Retail Contrast by Centre
Chase & Partners Report Appendix 7 - Black Country Population Trend
Figures.
Chase & Partners Report Appendix 8 - Catchment Areas from SBCC Report
Chase & Partners Report Appendix 10 - Zone A Retail Rental Levels by Centre
Chase & Partners Report Appendix 11 - Waterfront and Merry Hill Offices
Chase & Partners Report Appendix 12 - Central Birmingham Office Sector Summary Assessment
Chase & Partners Report Appendix 13 - Recent Retail Transactions
Economic Impact of the Expansion of Brierley Hill/Merry Hill (Regeneris April 2006)
Assessment of Future Market Shares - White, Young Green May 2006
Comparison of Out of Centre Retail Outlets - (White Young Green May 2006)
Complementary Centres Strategy - (Dudley MBC May 2006).
Complementary Centres Strategy - Appendix
Complementary Centres Strategy Dudley MBC - Technical Report
Complementary Centres Startegy Dudley MBC-Supporting Photographs
Health Checks of Sandwell MBC Centres, Alliance Planning (2007)

Environment

HLF Presentation for 14th June
Strategic Flood Risk Assessment (Jacobs)
Habitats Regulations Assessment (White Young Green)
Birmingham & Black Country Biodiversity Action Plan
Black Country Geodiversity Plan
RSS Biodiversity Enhancement Areas
Environmental Transformation Plan for the Black Country Project Plan (Davis Langdon)

Waste
Waste Background Paper (available to download below)

Minerals
Minerals Background Paper (available to download below)
A Survey of Current Mineral Reserves in the Black Country (Scott Wilson March 2007) (available to download below)
Related Documents

● **A Survey of Current Mineral Reserves in the Black Country**
  Scott Wilson, March 2007

● **Minerals Background Paper**
  Information and Evidence about Minerals in the Black Country

● **Waste Background Paper**
  Evidence and Information about Waste in the Black Country

Sustainability Appraisal

  SA Report Annex B- 1st Sustainability Report
  Summary Leaflet: An Independent Sustainability Appraisal (May 2006)

● Sustainability Appraisal/Strategic Environmental Assessment of the Joint Core Strategy for the Black Country, Tesserare Environmental

Diversity

● **Diversity and the Black Country Study -The Need for a Diversity Strategy - (Gurbux Singh March 2006)**
Appendix 4 – Monitoring Framework

The monitoring framework for the Joint Core Strategy is set out below, it lists the proposed indicators with which to monitor the various proposed policies.

The framework itself is divided into the Directions of Change of the Core Strategy and the Sustainability Objectives (from the Sustainability Appraisal) covered by the Core Policies.

The structure of the framework is made up of individual indicators that relate to one or more proposed policies, there are also targets related to the indicators with which to measure if the policies are working. Where there are not specific targets that apply, baseline data will be needed with which to monitor trends over time. The table also shows the source of the information and the type of indicator.

The types of indicators are as follows:

- National Indicators (NI) – Taken from the National Outcome and Indicator Set
- Regional Spatial Strategy (RSS) – Taken from the Phase 2 submission document
- West Midlands Local Transport Plan (LTP) – Taken from the WMLTP 2006
- Core Outcome Indicators (COI) - Set centrally for Annual Monitoring Reports to monitor (these are currently out to consultation)
- SA Framework (SA) – These indicators are listed in the Sustainability Appraisal, as this document is a work in progress, these indicators may change
- Regional Returns (RR) – These are returns submitted to the regional body that monitor the development of land for the following: housing, employment, office, retail, leisure, derelict land and waste.

The table is incomplete as work is still ongoing to identify the relevant indicators, targets, baseline information, sources of information and the type of indicator. The indicators may also change following the consultation period if the proposed policies are amended.
Direction of Change 1 – Sustainable Communities

- Cohesive and prosperous communities
- Affordable and aspirational housing, services and facilities
- Education, training and health and well-being

Sustainability Objectives:

- Safeguard and improve community health, safety and well being
- Provide environmentally sound, good quality affordable housing for all
- Encourage opportunities for investment in order to grow the local and sub-regional economy
- Protect, enhance and manage sites, features, areas and landscapes of archaeological, historical and cultural heritage importance
- Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place
- Use and manage land, energy, soil, mineral and water resources prudently and efficiently and increase energy generated from renewables
<table>
<thead>
<tr>
<th>Ind ref</th>
<th>Indicator</th>
<th>Policy No.</th>
<th>Target</th>
<th>Source</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Supply of ready to develop housing sites (5 year period and 15 year period) Number of residential units granted planning permission Planning Trajectory</td>
<td>CP6;</td>
<td>Residential Dwellings with planning permission by LA Dwellings identified in Development Plan allocations 2006-2026</td>
<td>Planning policy section of each LA</td>
<td>RSS COI RR</td>
</tr>
<tr>
<td>3</td>
<td>Number of completions and capacity by:</td>
<td>CP6</td>
<td>Source Dudley Sandwell Walsall Wolv 1380 1380</td>
<td>Planning policy section of each LA</td>
<td>RSS COI</td>
</tr>
<tr>
<td>Ind ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>---------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>--------</td>
<td>--------</td>
<td>------</td>
</tr>
<tr>
<td></td>
<td>Corridors; Free-standing employment areas (FC); Housing Renewal Areas; Strategic Centres (SC); Intensification (I); other sources; conversions</td>
<td>RC3</td>
<td>975</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>RC4</td>
<td>4600</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>RC6</td>
<td>2550</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>RC7</td>
<td>800</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>RC8</td>
<td>5150</td>
<td>920</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>RC9</td>
<td>6150</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RC10</td>
<td>735</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RC11</td>
<td>5125</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RC12</td>
<td>3670</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RC13</td>
<td>2020</td>
<td>4770</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RC14</td>
<td>500</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RC15</td>
<td>640</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RC16</td>
<td>890</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>FS</td>
<td>230</td>
<td>765</td>
<td>1530</td>
<td>265</td>
</tr>
<tr>
<td></td>
<td>SC</td>
<td>3000</td>
<td>0*</td>
<td>500</td>
<td>2400</td>
</tr>
</tbody>
</table>

*West Bromwich SC is included in RC12

<p>| 4       | Number of demolitions          | CP6        | Black Country - 2007-2016 - 11425 demolitions 2016-2026 - 14375 demolitions | Planning policy section of each LA | RSS COI RR |
| 5       | Number of allocated housing sites lost to other uses                       | CP6        | 0                                               | Planning policy section of each LA |      |
| 6       | Percentage of eligible housing sites providing community open space         | CP6        | 100%                                            | Planning policy section of each LA |      |
| 7       | Number of new residential developments on PDL                                | CP6        | Black Country - 95%                            | Planning policy section of each LA | RSS COI |</p>
<table>
<thead>
<tr>
<th>Ind ref</th>
<th>Indicator</th>
<th>Policy No.</th>
<th>Target</th>
<th>Source</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Number of dwellings refurbished in the Housing Market Intervention Area</td>
<td>CP7</td>
<td>?? Dwellings to be refurbished per annum in the Housing Market Intervention Area</td>
<td></td>
<td>SA</td>
</tr>
<tr>
<td>9</td>
<td>Number of A/B units in specified areas?</td>
<td>CP8</td>
<td>?? A/B units completed per annum (need a definition of A/B units??) – HMA may provide target figure</td>
<td></td>
<td>RSS</td>
</tr>
<tr>
<td>10</td>
<td>Percentage of housing types completed</td>
<td>CP8</td>
<td>Will HMA set out different house types needed, monitor against these? 1 person accommodation = 18%</td>
<td>Planning policy section of each LA</td>
<td>RSS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2 person accommodation = 45%</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3 person accommodation = 42%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Number of pitches for Gypsies and Travellers?</td>
<td>CP8</td>
<td>Black Country - 40 pitches for Gypsies and Travellers between 2006-2011 (annual growth of 2-3% 2011-2026)</td>
<td>Planning policy section of each LA</td>
<td>RSS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Target may change when GTAA available</strong></td>
<td></td>
<td>COI</td>
</tr>
<tr>
<td>12</td>
<td>Number of plots for travelling showpeople?</td>
<td>CP8</td>
<td>Black Country - 44-59 plots for travelling showpeople **Target may change when GTAA available</td>
<td></td>
<td>RSS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Target may change when GTAA available</strong></td>
<td></td>
<td>COI</td>
</tr>
<tr>
<td>13</td>
<td>Number of rented / intermediate units completed</td>
<td>CP9</td>
<td>Wolverhampton - 70% - rent, 30% - intermediate Sandwell and Dudley - 50% - rent, 50% - intermediate</td>
<td>Planning policy section of each LA</td>
<td>RSS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Walsall - 90% - rent, 10% intermediate Dudley - 50%</td>
<td></td>
<td>COI</td>
</tr>
<tr>
<td>14</td>
<td>% of completed affordable housing on qualifying S106 sites</td>
<td>CP9</td>
<td>Wolverhampton and Sandwell - 40%</td>
<td>Planning policy section of each LA</td>
<td>RSS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Walsall - 25%</td>
<td></td>
<td>COI</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Dudley - 35%</td>
<td></td>
<td>SA</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RR</td>
</tr>
<tr>
<td>15</td>
<td>% of eligible housing sites granted planning permission providing affordable housing</td>
<td>CP9</td>
<td>100%</td>
<td>Planning policy section of each LA</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Amount of Community Open Space</td>
<td>CP18</td>
<td>Black Country ???</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ind ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>--------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td>------</td>
</tr>
<tr>
<td></td>
<td>per 1000 population</td>
<td></td>
<td>Sandwell UDP - 2ha Wolverhampton - Walsall - Dudley -</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Proportion of eligible housing sites providing community open space</td>
<td>CP18</td>
<td>100%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>The number of sports pitches available to the public per 1000 population</td>
<td>CP10</td>
<td>Sandwell - 0.48ha per 1000 population Wolverhampton - 0.8ha per 1000 population by 2011 Walsall - Dudley -</td>
<td>SA</td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Amount of inappropriate developments on sport pitches / facilities</td>
<td>CP10</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Number of community and sporting facilities located in unsustainable locations</td>
<td>CP10</td>
<td>0% (need definition of unsustainable location to be able to monitor)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Number of Sports Beacons in locations not specified or contrary to specified criteria</td>
<td>CP10</td>
<td>0%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>Travel time by public transport to nearest health centre</td>
<td>CP10</td>
<td>LTP2 - Increase the total population within 30 minutes inter-peak travel time of a main NHS hospital by 'accessible' public transport from the 2005 baseline by 50% by 2011</td>
<td>SA</td>
<td></td>
</tr>
<tr>
<td>23</td>
<td>Number of BC sports facilities complying with Building Schools for the Future programme</td>
<td>CP10</td>
<td>100%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ind ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>--------</td>
<td>----------------------------------------------------------------------------</td>
<td>------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td>------------</td>
</tr>
<tr>
<td>24</td>
<td>Number of existing community facilities lost to other uses</td>
<td>CP10</td>
<td>0 (need a definitive list of community facilities, Wolverhampton have an assessment underway, other LA will have to follow)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td>Number of ‘particular facilities’ lost to other uses</td>
<td>CP10</td>
<td>0 (need a definitive list of particular facilities)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>% new community and sports facilities that are of an appropriate scale and nature</td>
<td>CP10</td>
<td>0 (need definitive list of appropriate scale and nature to be able to monitor)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>Amount of new comparison and convenience developments not in accordance with the Hierarchy of Centres</td>
<td>CP11</td>
<td>0%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>Percentage of new key services and facilities that are not accessible by local communities</td>
<td>CP13</td>
<td>0% (need definition of accessible)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>Percentage of new developments that meet the standards for access</td>
<td>CP13</td>
<td>100% (need definition of standards)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>30</td>
<td>% of new developments above size threshold providing travel plans and transport assessments</td>
<td>CP13</td>
<td>100%??</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>Number of schools with Travel Plans</td>
<td>CP13</td>
<td>LTP2 - 100% of schools to have travel plans by 2011</td>
<td>LTP Target Progress Report</td>
<td>LTP</td>
</tr>
<tr>
<td>32</td>
<td>Number of employees in organisations with Travel Plans</td>
<td>CP13</td>
<td>LTP2 - 30% of all employees to work in organisations committed to work place Travel Plans by 2011.</td>
<td>LTP</td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>% of developments receiving penalties for not delivering Travel</td>
<td>CP13</td>
<td>100% (how do we monitor this)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ind ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>--------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>--------</td>
<td>--------</td>
<td>------</td>
</tr>
<tr>
<td>34</td>
<td>Proportion of new development (except small scale developments ie, extensions to residential development) providing cycle parking</td>
<td>CP14</td>
<td>100%?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>Number of cycle routes that have been implemented</td>
<td>CP14; CP31</td>
<td>Length of cycle routes to be implemented Sandwell ?? Dudley ?? Walsall ?? Wolverhampton ??</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Direction of Change 2: Environmental Transformation**

- 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

**Sustainability Objectives:**

- Safeguard and improve community health, safety and well being
- Reduce waste and maximise opportunities for innovative environmental technologies in waste management
- Plan for the anticipated different levels of climate change
- Minimise the Black Country’s contribution to climate change
- Provide environmentally sound, good quality affordable housing for all
- Use and manage land, energy, soil, mineral and water resources prudently and efficiently, and increase energy generated from renewables
- Value, maintain, restore and re-create biodiversity and geodiversity

<table>
<thead>
<tr>
<th>Ind Ref</th>
<th>Indicator</th>
<th>Policy No.</th>
<th>Target</th>
<th>Source</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>36</td>
<td>Reuse and refurbishment of buildings of heritage value</td>
<td>CP14; ??</td>
<td>?? % of buildings of heritage value reused or refurbished</td>
<td></td>
<td>SA</td>
</tr>
<tr>
<td>37</td>
<td>Percentage of housing developments meeting the CABE building for life 'good' standard and 'very good' standard</td>
<td>CP13</td>
<td>All new housing developments meeting the Building for Life 'good' standard. All medium and large scale developments meeting the 'very good' standard</td>
<td>CABE Housing Audit?</td>
<td>RSS</td>
</tr>
<tr>
<td>38</td>
<td>Number of new developments in accordance with Historic Landscape Characterisation (set of criteria)</td>
<td>CP14</td>
<td>100% (need list of HLC criteria), how to monitor?</td>
<td>SA</td>
<td></td>
</tr>
<tr>
<td>39</td>
<td>Density of developments</td>
<td>CP15</td>
<td>Areas adjacent to good public transport links</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Density of - 60-75 dph net (45 dph gross)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>In the suburbs of the BC lower density developments of 40-60 dph net (35 dph gross)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Under 30 dph</td>
<td></td>
<td></td>
</tr>
<tr>
<td>40</td>
<td>Intensification - % increase in density</td>
<td>CP15</td>
<td>Retention of overall character of specific areas. Who will monitor this?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>41</td>
<td>Accessible natural greenspace</td>
<td>CP16</td>
<td>100% of population with Accessible Natural Greenspace of at least 2ha within 300m (or 5 minutes of their home) (Natural England)</td>
<td>SA</td>
<td></td>
</tr>
<tr>
<td>42</td>
<td>Number of eligible open spaces</td>
<td>CP16</td>
<td>Sandwell - 5 Green Flags by 2010 as part of the Local</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>-----</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td>------</td>
</tr>
<tr>
<td>managed to Green Flag Award Standard</td>
<td>Area Agreements (LAA), and the cultural strategy aims to achieve 6 Green Flags (one in each town). Wolverhampton – Walsall – Dudley – 1 by 2010 as part of LAA</td>
<td>CP16</td>
<td>0%</td>
<td>COI RR</td>
<td></td>
</tr>
<tr>
<td>43</td>
<td>Number of developments which compromise the open nature of Green Belt</td>
<td>CP16</td>
<td>By 2010, to ensure that 95% of SSSI’s are favourable or in a recovering condition. (National PSA Target)</td>
<td>RSS</td>
<td>SA</td>
</tr>
<tr>
<td>44</td>
<td>Condition of geological SSSI’s</td>
<td>CP16</td>
<td>Note from each AMR are there targets in the AMR</td>
<td>RSS</td>
<td>COI</td>
</tr>
<tr>
<td>45</td>
<td>Change in areas and populations of biodiversity importance, including: (i)</td>
<td>CP16</td>
<td>Change in priority habitats and species (by type) (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional sub-reg or local significance.</td>
<td>RSS</td>
<td>SA</td>
</tr>
<tr>
<td>46</td>
<td>Area of Nature Conservation designated per 1000 population (ha)</td>
<td>CP16</td>
<td>At least 1ha of Local nature Reserve per 1000 population (Natural England)</td>
<td>SA</td>
<td></td>
</tr>
<tr>
<td>47</td>
<td>Area of SACs lost to development (ha)</td>
<td>CP16; 0ha</td>
<td></td>
<td>SA</td>
<td></td>
</tr>
<tr>
<td>48</td>
<td>Amount of derelict land reclaimed (ha)</td>
<td>CP16</td>
<td>Annual Derelict Land Survey</td>
<td>RSS</td>
<td>RR</td>
</tr>
<tr>
<td>49</td>
<td>Length of water course deculverted</td>
<td>CP17</td>
<td>?? (suggested by Environment Group)</td>
<td>SA</td>
<td></td>
</tr>
<tr>
<td>50</td>
<td>Number of new homes achieving a 3, 4, 5 and 6 standard in the Code for</td>
<td>CP19</td>
<td>All new residential dwellings to meet level 4 from adoption date of the Core Strategy and carbon neutral</td>
<td>RSS</td>
<td>SA</td>
</tr>
<tr>
<td>Ind Ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>---------</td>
<td>-----------</td>
<td>-----------</td>
<td>--------</td>
<td>--------</td>
<td>------</td>
</tr>
<tr>
<td></td>
<td>Sustainable Homes?</td>
<td></td>
<td>by 2016</td>
<td>Non – domestic – RSS 10% below target emission rate of the current Building Regulations by 2016 but CS policy will be higher</td>
<td>inc. NHBC</td>
</tr>
<tr>
<td>51</td>
<td>Number of new buildings with BREEAM rating and / or the national Home Energy Rating (NHER) as % all new build?</td>
<td>CP17;</td>
<td>?? Number of units with BREEAM / NHER rating of?? Is this the same as Indicator 54?</td>
<td></td>
<td>SA</td>
</tr>
<tr>
<td>52</td>
<td>Number of planning applications approved where Environment Agency have sustained an objection on flood risk grounds</td>
<td>CP17;</td>
<td>0</td>
<td></td>
<td>RSS SA</td>
</tr>
<tr>
<td>53</td>
<td>% of developments meeting the minimum standards for the “Surface Water Run – off” and “surface Water Management” categories in the Code for Sustainable Homes</td>
<td>CP17;</td>
<td>100%</td>
<td></td>
<td>SA</td>
</tr>
<tr>
<td>54</td>
<td>Number of planning permission incorporating SUDS</td>
<td>CP17;</td>
<td>??</td>
<td></td>
<td>SA</td>
</tr>
<tr>
<td>55</td>
<td>% of new development incorporating renewable production equipment of at least 10%</td>
<td>CP18</td>
<td>All new development (commercial schemes of 1000m2 and over and housing schemes of 10 dwellings or more) to incorporate renewable energy production equipment to provide at least 10% of predicted energy requirements for the development upto 2010. Increase by 1% annually up to 20% by 2020.</td>
<td></td>
<td>LI</td>
</tr>
<tr>
<td>56</td>
<td>Number of non mineral developments</td>
<td>CP19</td>
<td>??%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

138
<table>
<thead>
<tr>
<th>Ind Ref</th>
<th>Indicator</th>
<th>Policy No.</th>
<th>Target</th>
<th>Source</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>57</td>
<td>Maintain level of sand and gravel reserves in line with RSS landbank</td>
<td>CP20</td>
<td></td>
<td>RSS COI</td>
<td></td>
</tr>
<tr>
<td>58</td>
<td>Level of provision of sand and gravel per annum</td>
<td>CP20</td>
<td>10% of the 0.50mt of sand and gravel per annum</td>
<td>RSS COI</td>
<td></td>
</tr>
<tr>
<td>59</td>
<td>Amount of Brick Clay reserves (tonnes)</td>
<td>CP21</td>
<td>Where mineral resources occur- have a stock of permitted reserves for 25 years</td>
<td>RSS COI</td>
<td></td>
</tr>
<tr>
<td>60</td>
<td>Number of open cast coal sites not in conformity with specified criteria</td>
<td>CP22</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>61</td>
<td>Number of sites producing secondary / recycled aggregates</td>
<td>CP20</td>
<td>??</td>
<td>RSS COI</td>
<td></td>
</tr>
<tr>
<td>62</td>
<td>Number of new development schemes that demonstrate that at least 25% of the minerals used derive from secondary or recycled sources</td>
<td>CP20;</td>
<td>100% of all major development schemes</td>
<td></td>
<td>SA</td>
</tr>
</tbody>
</table>

**Direction of Change 3: Economic Prosperity**

- 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
SA Objectives:
- Reduce traffic congestion and promote sustainable modes of transport into and throughout the Black Country
- Reduce waste and maximise opportunities for innovate environmental technologies in waste management
- Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place
- Use and manage land, energy, soil, mineral and water resources prudently and efficiently, and increase energy generated from renewables

<table>
<thead>
<tr>
<th>Ind Ref</th>
<th>Indicator</th>
<th>Policy No.</th>
<th>Target</th>
<th>Source</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>63</td>
<td>Amount of completed retail, office and leisure development in centres broken down by hierarchy</td>
<td>CP25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 64      | Amount and location of comparison retail completed (m2)                    | CP26       | RSS Phase 2 to 2016
Gross comparison retail floorspace - Wolverhampton – 54000 sq m
Brierley hill – 51000 sq m
Walsall - 45000 sq m
West Bromwich – 35000 sqm |        | RR |
| 65      | Amount and location of office development completed within strategic centres | CP26;     | RSS Phase 2 to 2021
B1a office floorspace 186000 sqm for each strategic centre |        | RR |
| 66      | Amount of new comparison, convenience shopping and office developments in smaller town and large district centres | CP27 CP 28| Black country – 51000 sq m up to 2016; 100000 sq m up to 2026 total development between all the smaller town and large district centres
At least one large foodstore in each small town centre |        | RSS RR |
<table>
<thead>
<tr>
<th>Ind Ref</th>
<th>Indicator</th>
<th>Policy No.</th>
<th>Target</th>
<th>Source</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>67</td>
<td>Size of convenience and comparison shopping developments, offices and leisure uses in local and small district centres</td>
<td>CP28</td>
<td>Convenience and comparison developments Small district centres - developments no larger than 1000m2 gross Local centres - developments no larger than 400m2 gross Local centres - developments no larger than 200m2 gross</td>
<td>25</td>
<td>Size of convenience and comparison shopping developments, offices and leisure uses in local and small district centres</td>
</tr>
<tr>
<td>68</td>
<td>Amount of retail and office developments granted permission and completed out of centre and edge of centre</td>
<td>CP30</td>
<td>0% out of centre that do not comply with specified criteria</td>
<td></td>
<td></td>
</tr>
<tr>
<td>69</td>
<td>LTP Light Rail use in the West Midlands</td>
<td>CP31;</td>
<td>LTP – increase light rail use from 5.1 million trips per year in 2003/4 to 5.8 million in 2010/11 in West Midlands</td>
<td>RSS LTP</td>
<td></td>
</tr>
<tr>
<td>70</td>
<td>Traffic mileage in the West Midlands</td>
<td>CP31;</td>
<td>LTP2 - No more than a 7% increase in road traffic mileage between 2004 and 2010</td>
<td>LTP SA</td>
<td></td>
</tr>
<tr>
<td>71</td>
<td>Applications granted for strategic and local park and ride sites</td>
<td>CP31;</td>
<td>??</td>
<td></td>
<td></td>
</tr>
<tr>
<td>72</td>
<td>Bus use in the West Midlands</td>
<td>CP31;</td>
<td>LTP2 – Increase bus use from the 2003/4 base of 325 million trips per year to 355 million by 2010/11</td>
<td>RSS LTP</td>
<td></td>
</tr>
<tr>
<td>Ind Ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>---------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>------------------------------------------------------------------------</td>
<td>--------</td>
<td>--------</td>
</tr>
<tr>
<td>73</td>
<td>Loss of rail networks and / formations</td>
<td>CP31;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>74</td>
<td>Amount of car parking spaces per use</td>
<td>CP32</td>
<td>Car parking standards?????</td>
<td>RSS</td>
<td></td>
</tr>
<tr>
<td>75</td>
<td>Amount of cycle parking per use</td>
<td>CP32</td>
<td>Cycle parking standards??</td>
<td></td>
<td></td>
</tr>
<tr>
<td>76</td>
<td>Improved access to our key employment areas</td>
<td>CP33; CP34; CP2</td>
<td>LTP2 - Increase the proportion of the West Midlands industrial areas that are accessible to 44 tonne lorries within five minutes of the nearest motorway junction (daytime inter-peak0 by 2% between 2004-2010</td>
<td>RSS LTP</td>
<td></td>
</tr>
<tr>
<td>77</td>
<td>Cycle usage</td>
<td>CP31</td>
<td>1% increase in the cycling index between 2003/4 and 2010/11</td>
<td>RSS</td>
<td></td>
</tr>
<tr>
<td>78</td>
<td>Routes used for movement of freight</td>
<td>CP34</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>79</td>
<td>Amount of land safeguarded for interchange between modes lost to development</td>
<td>CP31</td>
<td>0Ha</td>
<td></td>
<td></td>
</tr>
<tr>
<td>80</td>
<td>Total amount of completed employment floorspace</td>
<td>CP36</td>
<td>To be completed</td>
<td>RSS RR</td>
<td></td>
</tr>
</tbody>
</table>

**Source**

RSS Phase 2 – minimum rolling five year reservoir of 185ha of land for the Black Country And 555ha to 2021
<table>
<thead>
<tr>
<th>Ind Ref</th>
<th>Indicator</th>
<th>Policy No.</th>
<th>Target</th>
<th>Source</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>81</td>
<td>Percentage of employment development on previously developed land</td>
<td>CP36</td>
<td>90%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>82</td>
<td>Total Employment land available</td>
<td>CP36; CP37</td>
<td>Total land capable of meeting High Quality Employment Land requirements to 2026 – 1415ha</td>
<td>RSS</td>
<td>RR</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total land currently considered to be High Quality – 415 ha</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Local Employment Land requirement in 2026–1100 ] ha</td>
<td></td>
<td></td>
</tr>
<tr>
<td>83</td>
<td>Loss of employment sites to other uses</td>
<td>CP37</td>
<td></td>
<td>RSS</td>
<td>RR</td>
</tr>
<tr>
<td>84</td>
<td>Location of new industrial and logistical development</td>
<td>CP36</td>
<td>Preferred locations are those designated as existing / potential high quality employment land</td>
<td>RRR</td>
<td></td>
</tr>
<tr>
<td>85</td>
<td>Number of planning permission for uses other than B1(b/c), B2 and B8 in high Quality employment Areas</td>
<td>CP36</td>
<td></td>
<td>RSS</td>
<td>RR</td>
</tr>
<tr>
<td>86</td>
<td>Number of uses not identified as ‘local employment uses’ built on local employment land</td>
<td>CP37</td>
<td></td>
<td>RSS</td>
<td>RR</td>
</tr>
<tr>
<td>87</td>
<td>Loss of high quality and local employment land</td>
<td>CP36; CP37</td>
<td></td>
<td>RSS</td>
<td>RR</td>
</tr>
<tr>
<td>Ind Ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>---------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>----------------------</td>
<td>------</td>
</tr>
<tr>
<td>88</td>
<td>Amount of new high Technology businesses located close to university facilities and hospitals or in particular areas</td>
<td>CP39</td>
<td>???</td>
<td></td>
<td></td>
</tr>
<tr>
<td>89</td>
<td>Number of new employment developments that will provide training opportunities either in-house, day release courses or local recruitment policies or make a contribution towards training and skills improvement</td>
<td>CP40</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>90</td>
<td>Municipal waste land filled</td>
<td>CP41</td>
<td>By 2010 to reduce biodegradable municipal waste landfilled to 75% of that produced in 1995; by 2013 50% and 2020 35% (UK waste strategy 2000)</td>
<td>RSS COI SA RR</td>
<td></td>
</tr>
<tr>
<td>91</td>
<td>Municipal waste capacity</td>
<td>CP41</td>
<td>RSS phase 2 - By 2026 Black Country should divert at least 630000 tonnes of waste away from landfill</td>
<td>RSS COI SA RR</td>
<td></td>
</tr>
<tr>
<td>92</td>
<td>Commercial waste</td>
<td>CP41</td>
<td>RSS phase 2 - By 2026 the Black Country should divert at least 1832000 tonnes of commercial and industrial wastes away from landfill</td>
<td>RSS COI SA RR</td>
<td></td>
</tr>
<tr>
<td>93</td>
<td>Waste Treatment Gaps</td>
<td>CP41</td>
<td>?? of waste facilities completed to fill the 'Treatment Gap'</td>
<td></td>
<td></td>
</tr>
<tr>
<td>94</td>
<td>Loss of existing waste management facilities</td>
<td>CP41</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>95</td>
<td>Number of new sites for facilities to store, treat and remediate</td>
<td>CP41; CP26</td>
<td>??</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ind Ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>--------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------</td>
<td>---------------------------------------------------------------------------------------------</td>
<td>--------------</td>
<td>--------------</td>
</tr>
<tr>
<td>96</td>
<td>Amount of municipal waste arising, and managed by management type, and the percentage each management type represents of the waste managed</td>
<td>CP41</td>
<td></td>
<td>RSS COI SA RR</td>
<td></td>
</tr>
<tr>
<td>97</td>
<td>Applications for landfill sites</td>
<td>CP41</td>
<td>??</td>
<td></td>
<td></td>
</tr>
<tr>
<td>98</td>
<td>Applications for waste management / recycling facilities by location</td>
<td>CP42</td>
<td>Use classes B1 or B2 or processes that take place inside buildings – High Quality or local employment land Processes that take place in the open and/or may cause noise, dust ant other potential nuisances – local employment land</td>
<td></td>
<td></td>
</tr>
<tr>
<td>99</td>
<td>Number of major waste strategic facilities needed and granted planning permission</td>
<td>CP41</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100</td>
<td>Amount of waste / resource management needed outside the Black Country</td>
<td>CP42</td>
<td>Not sure if this can be monitored</td>
<td></td>
<td></td>
</tr>
<tr>
<td>101</td>
<td>Amount of waste / resource management needs provided outside the Black Country</td>
<td>CP42</td>
<td>Not sure if this can be monitored</td>
<td></td>
<td></td>
</tr>
<tr>
<td>102</td>
<td>Number of proposed landfill sites</td>
<td>CP43</td>
<td>??</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ind Ref</td>
<td>Indicator</td>
<td>Policy No.</td>
<td>Target</td>
<td>Source</td>
<td>Type</td>
</tr>
<tr>
<td>---------</td>
<td>-----------------------------------------------------------------------------------------------------</td>
<td>------------</td>
<td>--------</td>
<td>--------</td>
<td>------</td>
</tr>
<tr>
<td></td>
<td>and existing mineral working sites that have been restored by landfill by 2026</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>103</td>
<td>Number of landfill sites and former landfill sites generating energy from landfill gas</td>
<td>CP43</td>
<td>??</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
A Joint Core Strategy for the Black Country