

Ubiquis

**Black Country Core Strategy  
Preferred Options Consultation:  
Analysis of Responses**

May 2008

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## **Preface**

### **I. About the Consultation**

#### **1. Background**

The Black Country is made up of four local authority areas: Dudley, Sandwell, Walsall and Wolverhampton. The Black Country Joint Core Strategy is a spatial planning document that 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 consider land use along with a comprehensive range of environmental, economic and social issues. It will essentially be a housing growth strategy which aims to play a pivotal role in delivering and enhancing cohesive and sustainable communities within the Black Country in the coming years. The Core Strategy will also seek to give clear direction to the attainment and delivery of economic wealth and prosperity within the Black Country and set an agenda for the environmental transformation of the Black Country in terms of its environmental and heritage features as well as its transportation networks.

#### **2. Evolution of the Core Strategy Document**

Local authorities are required by UK planning law to produce a Core Strategy document. It is the key compulsory Local Development Document and will go through various stages of consultation before being submitted to the Secretary of State. The Secretary of State will then appoint a Planning Inspector to ensure the document is sound and will deliver the local authority's vision and spatial objectives.

In the first stage, Issues and Options, a number of Regeneration Corridors were identified within which the majority of land use transformation will take place. The Issues and Options document was open to stakeholder consultation during July and August 2007. The Preferred Options stage, open to consultation in March and April 2008, was the second stage in the process of preparation of the Black Country Core Strategy.

A final consultation period on the Submission Core Strategy and the accompanying Sustainability Appraisal will take place in October 2008. The Submission Core Strategy will be subjected to independent examination in April 2009 and, in the absence of any objections, publication and adoption of the Core Strategy will take place in October 2009.

#### **3. Consultation Process**

The consultation period for the Preferred Options document was from 17 March - 28 April 2008. Around 1200 individuals and organisations were specifically invited to respond to the Preferred Options document. A series of public meetings was held and advertisements placed in the local media encouraging people to respond to the Preferred Options document.

Respondents were invited to comment by completing an online representation form; by completing a paper representation form (available at the planning offices and main libraries of each local authority); or by attending a local consultation event.

*a. Consultation events*

Dudley Council held drop-in consultation events in each of the Dudley Borough regeneration corridors in Kingswinford, Dudley, Halesowen, Lye and Bilston. Walsall Council had a consultation bus in Walsall, Willenhall and Darlaston. Walsall Council had a staffed display at local neighbourhood partnership (LNP) meetings at Aldridge South & Streetly, Brownhills & Aldridge North, Darlaston, Blakenall, Palfrey & Pleck, Pelsall & Rushall, Willenhall, Pheasey & Paddock, and St Matthews. Walsall Council held a further drop-in session at the Age Concern Restaurant, Walsall town centre. Wolverhampton City Council held staffed exhibitions at Wolverhampton central library and the Mander Centre. Consultation events were attended by a broad cross-section of the general public.

## **II. About the Analysis**

### **1. Ubiquis' Role in the Consultation**

Ubiquis is an independent, private company with expertise in supporting public consultation. Ubiquis has no affiliation – either formal or informal – with the Black Country local authorities or any related department, body or representative, and it has no conflict of interest in connection with any of the respondents to the consultation.

### **2. Methodology**

Ubiquis' consultation team read each response provided by the Black Country local authorities and logged the information in a database designed by Ubiquis. Each **response** was submitted by a **respondent**, which could be an organisation, individual or group. Each response was broken down by analysis into one or more **representations**, where each representation consisted of comments on a particular policy area, or on the document as a whole.

The database provided a structure to capture all relevant information, including:

- the type of respondent;
- the mode of response (free-form or set form; web, email or paper);
- the Core Policy Area (CPA) addressed in the representation;
- the point of view of each representation (support, qualified support, qualified objection, objection, other);
- a short summary of the representation;
- a detailed summary of the representation;
- the cross-cutting themes of the representation (see further below)
- the tests of soundness, if these were addressed.

For the majority of representations, the respondent specified the CPA or paragraph number they were addressing. In some cases, when a respondent did not specify this, Ubiquis' team assigned the

comment to the most appropriate CPA. A relatively small number of representations were of a general nature and were not assigned to a CPA.

*a. Point of view*

Representations were assigned to ‘support’, ‘qualified support’, ‘objection’, ‘qualified objection’ or ‘other’ according to the judgement of Ubiquis’ team about the overall tenor of the representation. ‘Qualified support’ indicated a representation that was generally supportive of the policy, but was conditional on an alteration or further development; or a representation that was generally supportive, but expressed objection to one or more small elements of the policy. ‘Qualified objection’ indicated a representation that objected to the policy, but indicated they could be swayed if considerable changes were made; or a representation which was broadly negative but expressed support for one or more aspects of the policy.

‘Other’ was generally used for representations where the respondent did not wish to express support or objection, but rather to provide additional information or comment in a more neutral fashion. If the respondent objected, the grounds for the objection in terms of the tests of soundness were recorded, if indicated by the respondent.

*b. Themes and sub-themes*

Themes and sub-themes used were:

- **Location of growth**
  - Brierley Hill
  - Walsall
  - West Bromwich
  - Wolverhampton
  - Strategic centres
  - Regeneration corridors
  - Other
- **Population and housing**
  - Housing targets
  - Housing density
  - Delivery
  - Affordable housing
  - Quality of housing/character/design
  - Range and type of housing
  - Other
- **Infrastructure**
  - Cost and funding
  - Implementation
  - Health
  - Education
  - Water and sewerage
  - Waste disposal
  - Energy
  - Recreation
  - Cultural facilities
  - Community facilities
  - Heritage
  - Retail
  - Other
- **Transport**
  - Public transport
  - Pedestrian and cycle routes
  - Accessibility
  - New roads/road improvements
  - Parking
  - Congestion
  - Other
- **Environment**
  - General environmental sustainability
  - Green Belt/Greenfield land
  - Green infrastructure
  - Wildlife and biodiversity
  - Flood risk
  - Pollution
  - Climate change
  - Energy efficiency
  - Renewable energy
  - Mineral resources
  - Other
- **Employment and Economy**
  - Quantity of new jobs
  - Employment type mix
  - Retail development
  - Location of employment
  - Other
- **Consultation**
  - Documentation
  - Methodology
  - Other
- **Other**

*c. Consultation events*

For each of the consultation events, the event facilitators wrote notes on the issues raised by those who attended. For the purpose of this analysis, each event was treated as a single response. Each different point on the CPAs raised by attendees was treated as a separate representation.

### **3. Purpose of this Document**

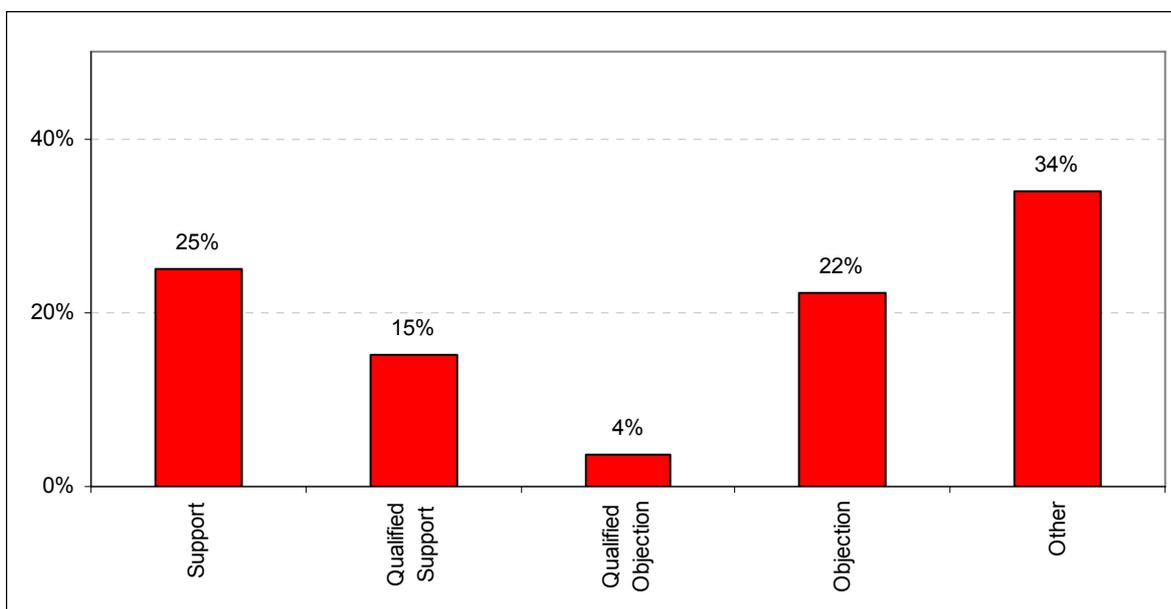
This document analyses the responses received from stakeholders and the public to the Preferred Options document in both quantitative and qualitative terms in order to assist the Joint Black Country Local Authorities in reporting on and revising their Core Strategy Preferred Options document. It provides detailed analysis of the representations made on each of the CPAs and provides an overview of the cross-cutting themes raised by respondents. Where relevant, it also analyses the data by respondent type.

## Outline of Responses

### I. Numbers of Representations

165 respondents submitted responses to the Preferred Options document. Of these, 51 (31%) replied using the structure of the questionnaire distributed by the Black Country Local Authorities (either by web questionnaire, email or paper) and 114 (69%) submitted a free-form response (paper or email).

The 165 responses were broken down by analysis into 1,176 individual representations. The representations break down as follows in terms of balance of opinion:



**Figure 1. Points of view across all representations**

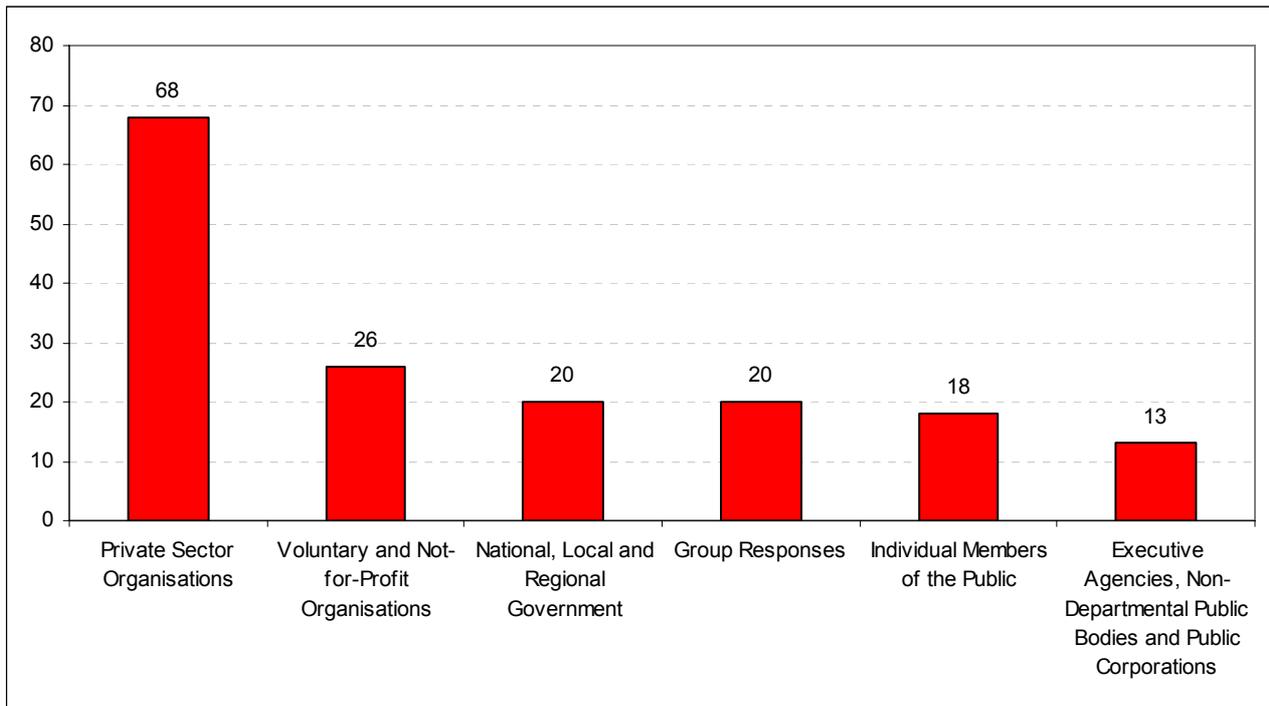
Across all representations, the majority (40%) expressed either support or qualified support, and 26% expressed either objection or qualified objection. The remainder, 34% of representations, were categorised as ‘other’, indicating that they provided additional information or suggested an addition to the policy, for example, rather than expressing a definite opinion.

The relatively low degree of objection is notable, and may be related to the fact that the majority of respondents to the consultation were organisations, many of whom had been invited to comment, rather than private individuals. Their responses were often extensive and detailed, and were generally very measured in tone.

### II. Respondent Type

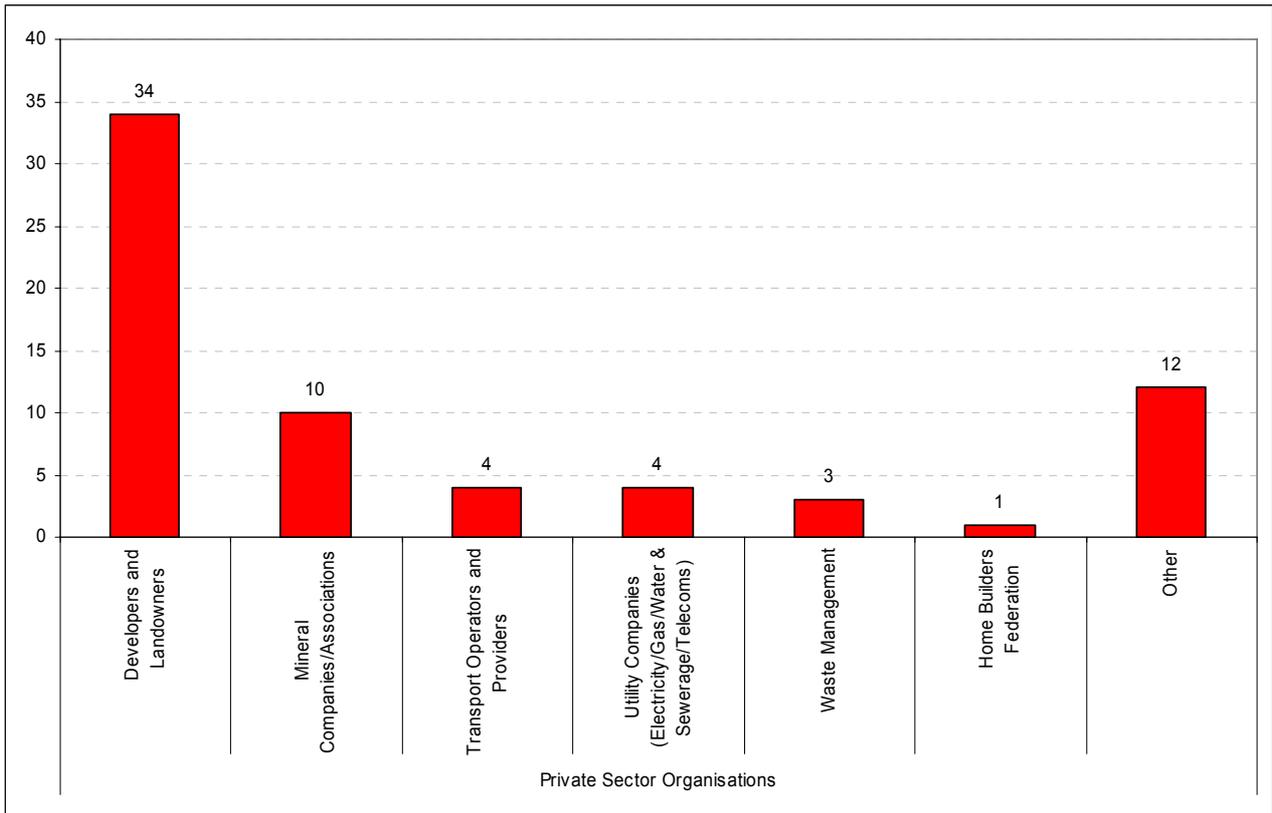
Of the 165 respondents, 18 were individuals, 20 were group responses (mostly from consultation events, detailed above) and 127 were organisations. Organisations were categorised by type and sub-type. The main types were:

- Private sector organisations
- Voluntary and not-for-profit organisations
- National, local and regional government
- Executive agencies, non-departmental public bodies and public corporations



**Figure 2. Number of responses from different types of respondents**

Private sector organisations were the most numerous, representing 41% of the total number of respondents. Within this category, developers and landowners were the largest group (34), followed by mineral companies and associations (10).



**Figure 3. Number of responses from private sector organisations**

### III. Core Policy Areas Commented On

The following table shows the number of representations received on each CPA. Policies attracting the most comment were:

- CPA2 – The Role of the Regeneration Corridors and Free-standing Employment Corridors (101)
- CPA5 – Provision of Infrastructure (74)
- CPA16 – Delivering Environmental Transformation (59)
- CPA1 – The Role of the Strategic Centres (58)
- CPA6 – Delivering Sustainable Housing Growth (50)
- CPA4 – Phasing and Delivery of Housing on Employment Land (45)

Policy Number	Number of Representations	Policy Number	Number of Representations	Policy Number	Number of Representations
CPA1	58	CPA16	59	CPA31	29
CPA2	101	CPA17	31	CPA32	8
CPA3	27	CPA18	35	CPA33	17
CPA4	45	CPA19	18	CPA34	17
CPA5	74	CPA20	11	CPA35	23
CPA6	50	CPA21	11	CPA36	28
CPA7	33	CPA22	10	CPA37	20
CPA8	7	CPA23	8	CPA38	9
CPA9	35	CPA24	13	CPA39	7
CPA10	30	CPA25	30	CPA40	10
CPA11	21	CPA26	21	CPA41	18
CPA12	43	CPA27	19	CPA42	13
CPA13	21	CPA28	10	CPA43	11
CPA14	28	CPA29	14	No specific policy	69
CPA15	18	CPA30	16		

## Cross-cutting Themes

### I. Overview

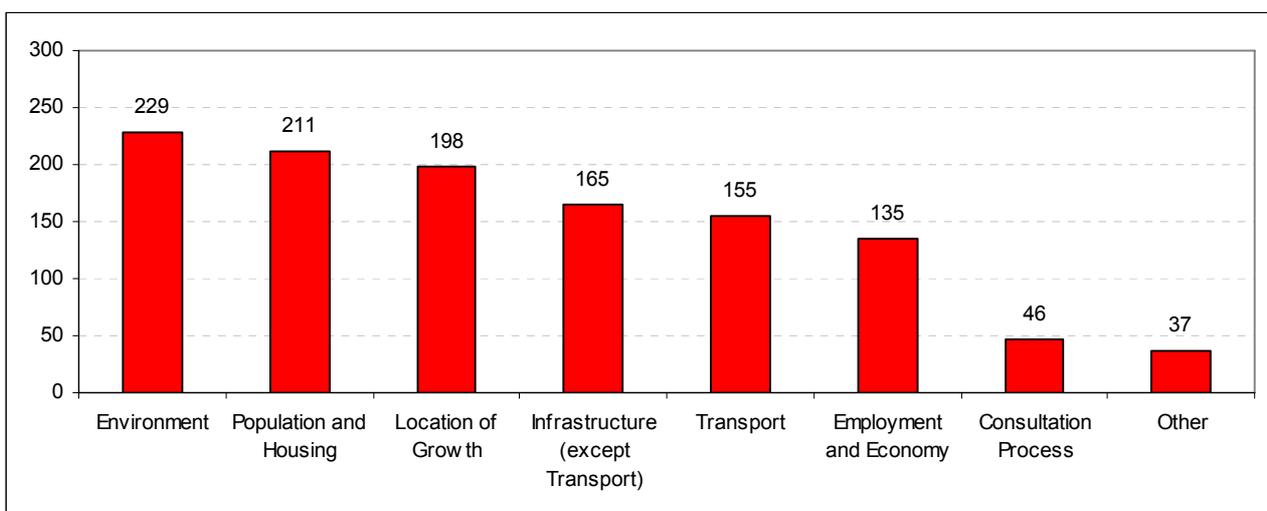
A number of cross-cutting themes emerged from the responses to the Preferred Options document, and in response to multiple CPAs of the consultation document. The six most prominent cross-cutting themes were:

- Environment (19%)
- Population and housing (18%)
- Location of growth (17%)
- Infrastructure (except Transport) (14%)
- Transport (13%)
- Employment and Economy (11%)

These themes emerge repeatedly in representations on all CPAs. In some cases, representations on important themes were submitted in reference to CPAs that were not directly related to that particular theme. These themes represent the issues that mattered most to respondents to the consultation, and those that they most wanted to bring to the attention of the Black Country local authorities.

An additional 4% of representations addressed the consultation process itself and are analysed at the end of this section.

The following graph shows the number of representations allocated on each theme.

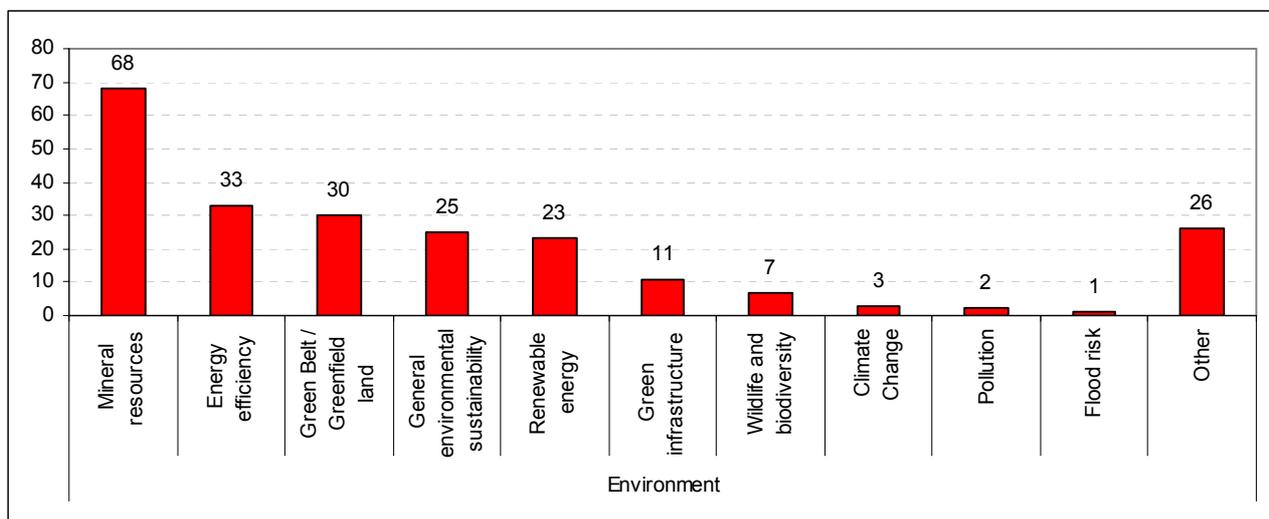


The environment was the most popular theme for representations, accounting for 19% of the total. Population and housing, and location of growth came next, accounting for 18% and 17% respectively.

## II. Environment

### 1. Overview

The environment was the theme of the largest number of representations, 229. Of sub-themes treated by respondents, mineral resource received the most representations (68). This was related to the number of separate policies dealing with mineral resources, and the fact that a considerable number of minerals companies responded to the consultation. Other prominent sub-themes included energy efficiency (33), Green Belt/greenfield land (30), general environmental sustainability (25) and renewable energy (23).



**Figure 4. Representations on environmental sub-themes**

Negative opinion in representations on the environment was more marked than on most themes. Although the total number of representations expressing support/qualified support was exactly equal to those expressing objection/qualified objection (32% each), the largest single point of view was unqualified objection. However, like most themes, the 'other' category (those who gave comments or suggestions rather than expressing a decided point of view) was very important, with 35% of representations.

### 2. Mineral Resources

Representations on the theme of mineral resources were split between broad support for protection and promotion of mineral extraction industries by private sector organisations (especially minerals companies), and fears for the environmental consequences by environmental groups. Local government respondents with an interest in this area were generally concerned with management and regulation of resources.

### 3. Energy Efficiency and Renewable Energy

Many developers and landowners argued that policies on energy efficiency and renewable energy were too demanding, going beyond national requirements and compromising the financial viability of development schemes. However, utility companies, environmental groups and individuals were generally supportive of ambitious targets.

### 4. Green Belt, Greenfield Land and Green Infrastructure

A number of developers and landowners objected to the lack of a review of Green Belt land and argued that greenfield development would be necessary to meet the ambitious housing targets in the Core Strategy. On the contrary, environmental groups supported the ‘brownfield first’ principle, and called for more definite targets for the provision of green infrastructure. Several respondents called for an early identification of green infrastructure, and for its implementation alongside housing and employment development.

### 5. Wildlife, Biodiversity and Climate Change

Several environmental groups called for greater protection and enhancement of biodiversity and geodiversity through the Core Strategy. A number of respondents objected to the absence of a CPA on climate change.

## III. Population and Housing

### 1. Overview

211 representations dealt with the theme of population and housing. Three areas received over 30 representations: range and type of housing (39); quality of housing, character and design (38) and housing density (35).

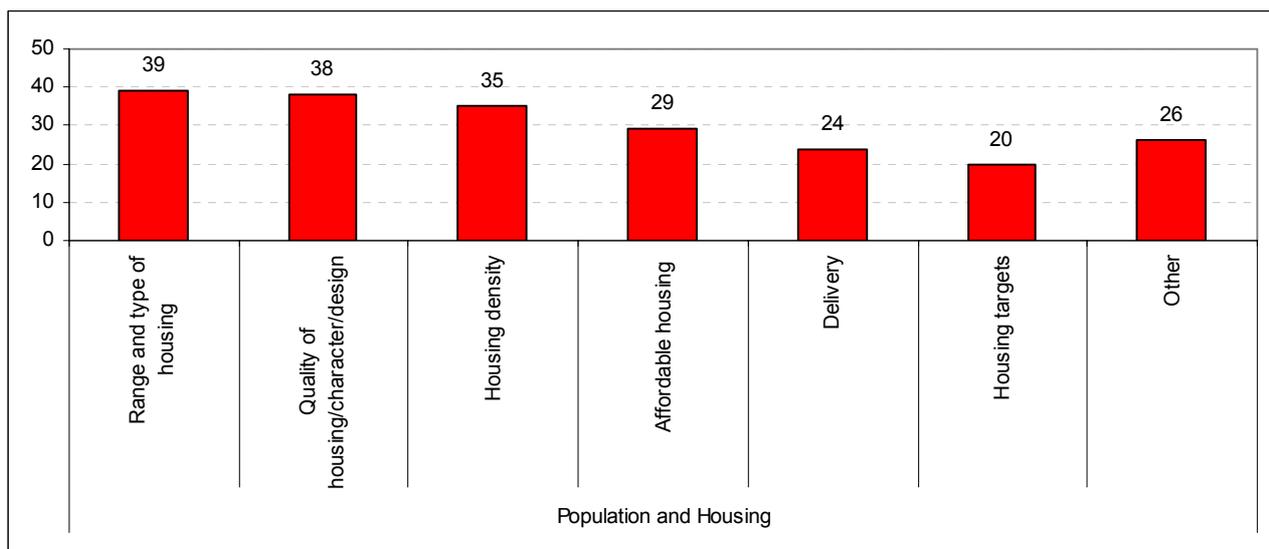


Figure 5. Representations on population and housing sub-themes

## **2. Range and Type of Housing**

There was general support for the intention of the Core Strategy to provide a range of housing. A number of individuals and those who attended group consultation events were concerned that much recent development had been apartments, and that more family houses were needed. This stance was repeated by a number of developers and landowners, who advocated lower density, high quality housing, preferably on greenfield sites. Some special interest groups requested that their needs were taken into account in terms of types of housing, including disabled people and the elderly.

## **3. Quality of Housing and Housing Density**

A range of features that would constitute high quality housing were suggested by respondents to the document, including density, character, safety needs and green space. Several developers and landowners tied in this sub-theme with that of range and type of housing, and housing density, and advocated more low-density development.

However, there was also support from developers and landowners and also from other respondent types including individuals for high-density development, since this was seen as most efficient and sustainable in terms of land use, and as having the greatest potential for redevelopment on brownfield sites. There was widespread concern that density targets should be flexible, and set locally rather than across the Black Country.

## **4. Affordable Housing**

The principle of providing affordable housing was welcomed, but many developers and landowners felt that the stated targets were too high, and that a single target for the Black Country was inappropriate. Instead, targets should be set locally and take into account local circumstances including the financial viability of schemes.

## **5. Delivery**

A range of issues were raised with regard to the delivery of housing. These included the difficulties of building on brownfield land, and concerns that the Core Strategy underestimated this; that the phasing policy should not prevent available sites from coming forward; and that the strategy must be sufficiently flexible to allow for an expected increase in regional housing targets in the Phase Two Revision to the Regional Spatial Strategy.

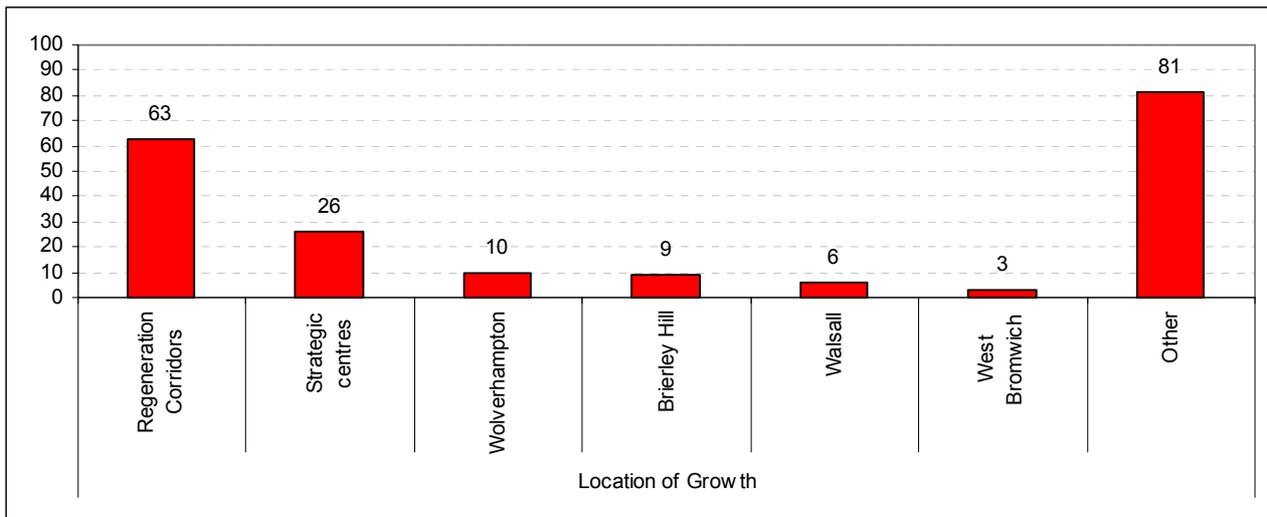
## **6. Housing Targets**

No respondents objected that the housing targets were too high, though one questioned whether immigration was causing a population increase in the Black Country. Rather, a number of developers and landowners felt that any target should be a minimum, and highlighted the probability that targets would be increased as a result of the Phase Two Revision to the Regional Spatial Strategy. They argued that the Core Strategy needed to be sufficiently flexible to accommodate this.

## IV. Location of Growth

### 1. Overview

A total of 198 representations were made on the theme of location of growth. The following graph shows how these representations were divided among a number of sub-themes, including the regeneration corridors, strategic centres (and comments on specific strategic centres), and other (including development outside the strategic centres and regeneration corridors). On this theme, almost three times as many representations expressed support as objection.



**Figure 6. Representations on location of growth sub-themes**

### 2. Regeneration Corridors

The principle of focusing development in regeneration corridors was broadly supported by respondents to the consultation. Whilst some developers and landowners supported the redevelopment of redundant employment sites for housing, others had concerns about sufficient employment land being provided. Individual respondents were particularly supportive of proposals to focus development on brownfield land within the regeneration corridors. However, developers and landowners expressed concerns that a target of 95% brownfield development was unrealistic.

### 3. Strategic Centres

In general, the proposed development hierarchy, with four strategic centres, was welcomed by respondents to the Preferred Options document, together with the principle that these centres should be the focus for development in the Black Country. There was some variety of opinion about how development should be split among the four centres, with respondents with interests in one particular centre generally favouring development in that location.

### 4. Other

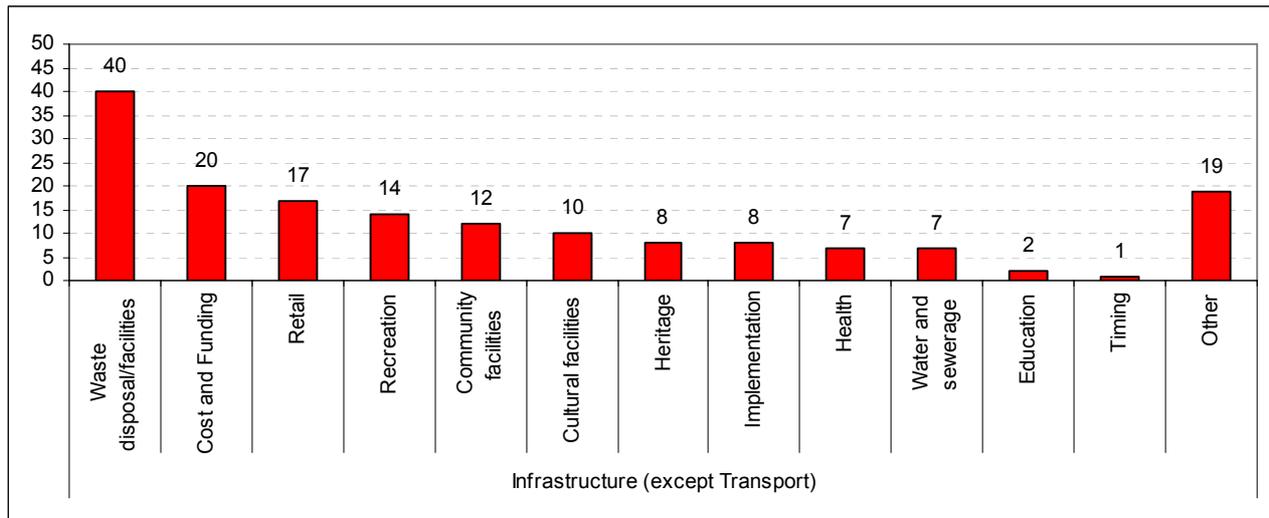
There was some support for development in non-strategic centres, for out-of-centre development, and for greater flexibility in the allocation of development outside the strategic centres and

regeneration corridors. Several respondents stressed the special role of Dudley, or advocated its assignment as a strategic centre.

## V. Infrastructure

### 1. Overview

Infrastructure was the theme of 165 representations. A considerable number of different areas of infrastructure were treated by respondents:



**Figure 7. Representations on infrastructure sub-themes**

Waste disposal and facilities attracted by far the highest number of representations (40), double the next highest number, on cost and funding (20). The major reason for this was that a considerable number of waste management providers responded to the consultation, and that waste management issues were also commented on by certain sectors of local government.

### 2. Cost, Funding and Implementation

Though a few individual respondents raised concerns as to how infrastructure would be funded, most representations on this sub-theme came from developers and landowners and local government. The former argued that developer contributions should be in line with national guidance, and directly relevant to the development. Some respondents supported a community infrastructure levy (CIL).

### 3. Waste Disposal and Facilities

Comments on waste disposal and facilities stressed the need to ensure that sufficient land was available for current and future demand, and dealt with the range of facilities that should be supplied. Environmental groups supported waste reduction, recycling and energy-from-waste schemes, whereas waste management companies emphasised the continuing importance of landfill.

#### **4. Retail**

Several individual respondents were opposed to large stores and called for small, independent stores to be supported. Local provision of retail facilities was welcomed.

#### **5. Recreation and Community Facilities**

The provision of community and recreational facilities was supported. The accessibility of such facilities by walking and cycling was promoted, as was their accessibility by disabled and disadvantaged groups within society.

#### **6. Cultural Facilities and Heritage**

A small number of respondents commented on cultural facilities, requesting that existing facilities be protected and enhanced, as well as new ones provided. Specific support for tourism facilities was demanded. With respect to heritage, interested respondents such as English Heritage felt that treatment of the historic environment in the Core Strategy was poor.

#### **7. Health**

The need for new health facilities alongside housing development was highlighted. The need for good access to healthcare was also stressed.

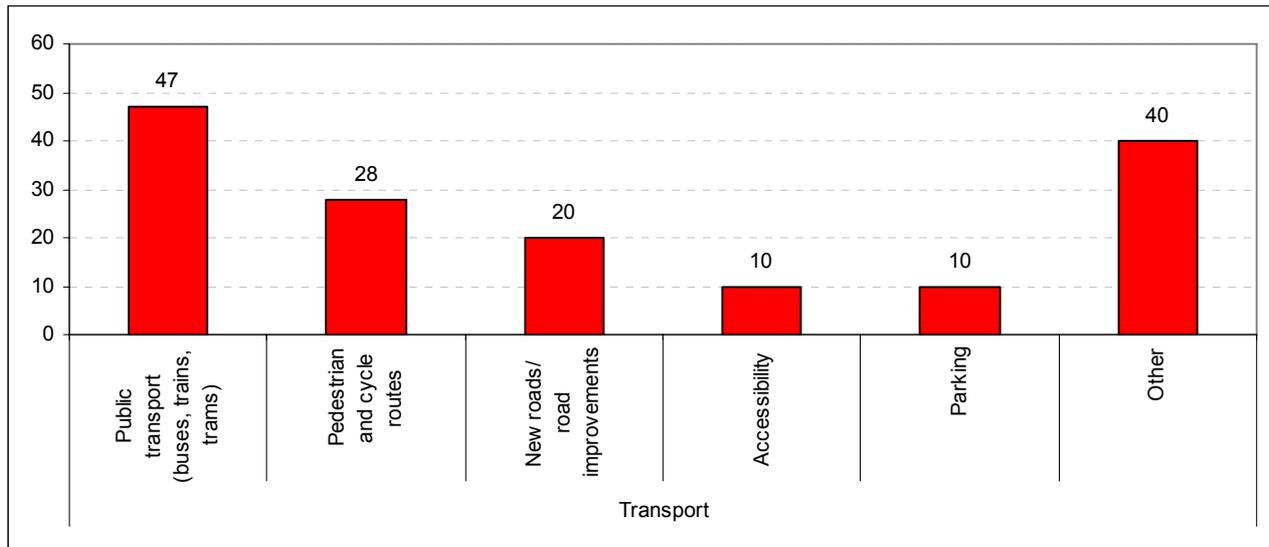
#### **8. Water and Sewerage**

Issues raised under this sub-theme included the suggestion of sustainable urban drainage schemes; the need for early consultation with water companies; and the need for a readily available reservoir. Waterway interest groups advocated that full use be made of inland waterways for transport, leisure and other uses.

### **VI. Transport**

#### **1. Overview**

155 representations covered the theme of transport, including both public and private modes.



**Figure 8. Representations on transport sub-themes**

Public transport was the most popular sub-theme for comment (47 representations), followed by pedestrian and cycle routes (28) and then new roads/road improvements (20).

## 2. Public Transport, Pedestrian and Cycling Routes

Sustainable transport was widely supported, though it was noted that use as well as provision needed to be addressed, and some environmental groups did not feel that policies in this area were sufficiently ambitious. It was noted that transport improvements should serve existing as well as new residents in the Black Country. Focusing development in locations easily accessible by public transport was welcomed by some respondents.

New pedestrian and cycling routes were welcomed, though some groups felt that the highway network should be made safer and more inviting to such users. There was particular support for accessibility on foot or by cycle of local retail and leisure facilities, and green spaces.

## 3. New Roads, Road Improvements and Parking

Much greater detail on specific proposals and implementation was called for in the area of new roads and road improvements. Road safety was raised as an issue, and a 20mph zone suggested by a number of respondents.

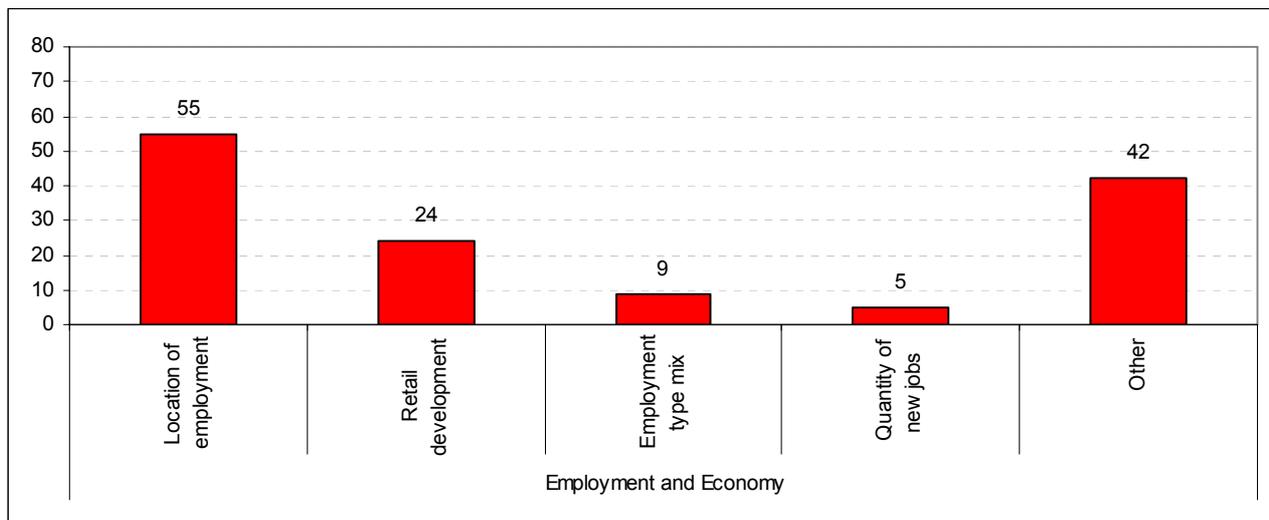
Further detail was requested on criteria for parking standards. The suggestion of such a scheme met with mixed support and objection, with supporters believing it would manage demand, and those objecting fearing that it would discourage development in certain areas.

# VII. Employment and Economy

## 1. Overview

Of the six cross-cutting themes, employment and economy attracted the smallest number of representations, 135 in total. The location of employment (i.e. the provision of employment land,

including location and delivery) received the highest number of representations (55), followed by retail development (24).



**Figure 9. Representations on employment and economy sub-themes**

There were high levels of support in representations on the theme of employment and economy. 63 representations expressed support or qualified support against 39 expressing objection or qualified objection.

## 2. Location of Employment

The policy of locating employment land within strategic centres and regeneration corridors was supported. Some respondents felt that insufficient employment land was provided for within the document, given the projected housing figures. With regard to land allocated for employment purposes, some developers and landowners argued that should it prove unsuitable for such uses, the policy should be flexible enough to allow for alternative forms of development. The provision and protection of high quality employment areas were particularly welcomed, though there was some confusion over whether ‘high quality’ applied to the land, the employment itself, or both.

## 3. Retail Development

Though the principle of concentrating development in centres was supported, several arguments were made with regard to retail development that out-of-centre sites should be permitted if suitable town centre sites were not available. Some developers had concerns about constraints on retail development in certain levels of the spatial hierarchy. The provision of local retail facilities was welcomed.

# VIII. Consultation

## 1. Overview

Throughout the consultation responses, a small number of respondents took the opportunity to comment on the consultation process and the opportunity for public participation. A total of 46 representations (4% of the total number of representations) were received that dealt with the

consultation process or documentation (including its structure and presentation) rather than the meaningful content of the document under consultation itself. Of these, five were judged to offer support or qualified support, 18 to express objection or qualified objection, and 23 were categorised as ‘other’.

## **2. Documentation**

The majority of representations on the theme of the consultation dealt with documentation (31). In a few places, respondents suggested that certain CPAs could be combined; these are also highlighted in the by-policy analysis. The Theatres Trust requested that the term ‘community facilities’ be defined. English Heritage objected to inconsistent use of vocabulary in describing the environment; they recommended that the terms ‘natural’, ‘built’ and ‘historic environment/assets’ be applied throughout the document.

The Home Builders Federation objected to the renumbering of the tests of soundness, since the organisation felt that this could cause confusion. It was suggested that cross-referencing the CPAs more thoroughly would improve the document substantially.

In terms of the key diagram and maps, there were several complaints that they were unclear. More specifically, it was suggested that providing the underlying Ordnance Survey data would enhance clarity. Several respondents complained that the key diagram was too complex and that simplification would render it clearer.

## **3. Methodology**

The comment was made that it might not be worth individuals and organisations putting serious effort into considering the Preferred Options document, given that the final wording of the submission to the Secretary of State would not be subject to further public consultation. Some complaints were made about the structure of the response form, and that respondents did not find it a user-friendly method to offer their comments on the Preferred Options document. In particular, respondents objected to being asked to submit a separate form for each CPA they wished to comment on, and some cited this as their reason for submitting a free-form response.

## **Analysis by Policy**

### **I. Introduction**

#### **1. Overview**

This section starts with analysis of representations on the document as a whole, and of those made on the opening section of the Preferred Options document. The main body of the chapter consists of analysis of each Core Policy Area, taking into account representations by all respondents who commented on it.

#### **2. Structure of Questionnaire**

The structure of the questionnaire issued by the Black Country authorities invited two different types of representation on Core Policy Areas. For most CPAs, respondents were simply asked whether they agreed or disagreed with the preferred approach (the questions in the Preferred Options document contained in blue boxes). Respondents were also asked to explain their support or objection for these questions. Respondents were also given the option of commenting on the Preferred Options document or Sustainability Appraisal in their entirety.

For some CPAs, the Black Country authorities were seeking a more detailed response to guide selection of a preferred approach (the questions in the Preferred Options document contained in yellow boxes). Respondents were also asked to include comments.

However, only 31% of respondents used this set-form questionnaire, whether on paper, by email or on the web. Furthermore, few of these respondents separated their representations on different types of CPAs within the questionnaire exactly as intended by the Black Country authorities.

#### **3. Analysis of Core Policy Areas**

The representations on each CPA are summarised and analysed, including the number of representations made on each CPA, and the main themes and issues raised by respondents. For those CPAs that received the most comment, additional detail is presented, including analysis of the balance of opinion of representations on that policy. CPAs treated in this manner are:

- CPA1 – The Role of the Strategic Centres (58 representations)
- CPA2 – The Role of the Regeneration Corridors and Free-standing Employment Corridors (101)
- CPA4 – Phasing and Delivery of Housing on Employment Land (45)
- CPA5 – Provision of Infrastructure (74)
- CPA6 – Delivering Sustainable Housing Growth (50)
- CPA16 – Delivering Environmental Transformation (59)

## **II. Whole Document**

### **1. Overview**

69 representations were made that did not relate directly to one of the CPAs, that addressed the document as a whole, or that addressed the opening section of the Preferred Options document ('The Black Country in 2026: Vision, Spatial Objectives and Spatial Strategy').

### **2. Support**

Several representations expressed their general support for the Preferred Options document and its publication. A typical representation of the type was this, from Lichfield District Council: 'The Council fully supports the regeneration of the Black Country through this growth orientated strategy, and acknowledges that this would be in conformity with the Regional Spatial Strategy and the Regional Economic Strategy, which seek achieve urban renaissance; promoting the economic, social and physical regeneration of the major urban areas of the West Midlands.'

### **3. Objection**

No comments were made expressing general objection to the document, though several respondents raised concerns that insufficient detail was provided on the implementation of the strategy. The Quarry Products Association objected that at this stage, the Black Country authorities should have decided on the form of their preferred policies, and not be consulting on them; they felt it difficult to make meaningful comments without these policies in place.

### **4. Cross-border Relationships**

A small number of respondents felt that the document should do more to highlight the relationship with adjoining local authority areas, particularly in areas where joint working would be essential to the success of the Core Strategy. On the other hand, Wolverhampton Development Company wondered whether common policies across the Black Country were too restrictive, and felt that local policies might be more appropriate in some areas.

### **5. Additional CPAs**

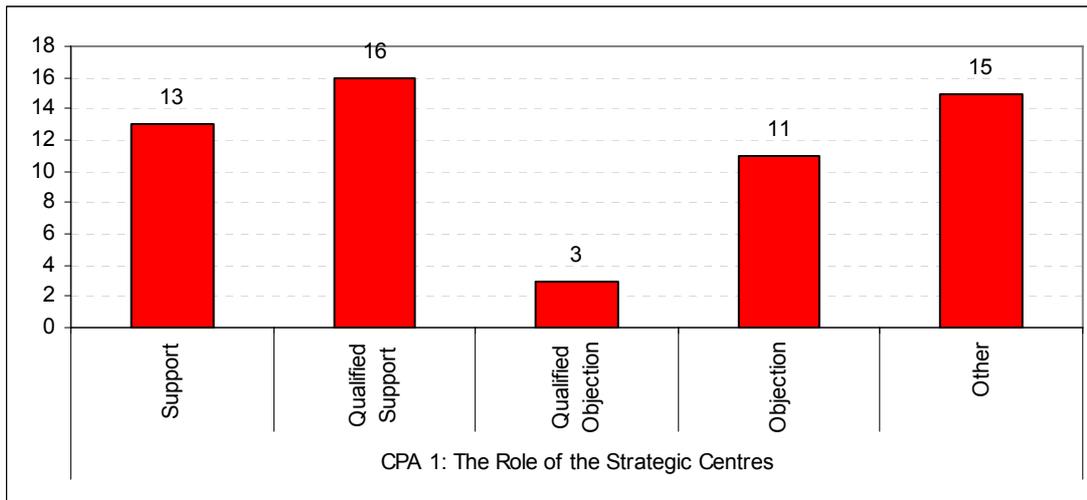
A few additional CPAs were advocated, including climate change, water supply and food supply.

## **III. Overall Approaches (CPA 1-5)**

### **CPA1 The Role of the Strategic Centres [58]**

#### *a. Overview*

Of the 58 representations on CPA1 (the policy that received the fourth largest number of representations), the role of the strategic centres, the majority welcomed the focus of development – including housing, retail, business, leisure and cultural uses – on the four strategic centres. The following graph shows the balance of opinion on this CPA.



**Figure 10. Points of view on CPA1**

Twice as many representations expressed support or qualified support (29) as expressed objection or qualified objection (14) to the policy.

*b. Strategic centres*

Several respondents called for further detail on proposals for each individual centre, including their unique strengths and opportunities. The following from Brierley Hills Estates Ltd was typical: ‘We support the proposal for the strategic centres, including Brierley Hill, to be the focus for development as set out in the policy. We also support the suggestion that policies should set out the common roles of the strategic centres, particularly that they act as a focus for retail, office and housing growth, and also that they provide convenience shopping and local services. However, it is difficult to comment further without seeing more detailed proposals for the wording of such policies.’

Respondents from strategic centres often offered particular comment on that centre. For example, the representation from the Darlaston LNP consultation event supported the regeneration of Darlaston town centre, especially environmental improvements to attract shoppers. Some representations, especially those from developers and landowners, offered considerable detail on specific development schemes for the strategic centres. For example, Midland & Regional Ltd provided an extensive representation on the Wolverhampton City Business District, supporting its location within the city centre.

There were calls for the policy to look beyond the Black Country at links with adjoining local authorities.

*c. Development outside strategic centres*

A few respondents stressed the role of large non-strategic centres, in particular Dudley, whilst others suggested clearer links between CPA1 and CPA27. There were some concerns that appropriate development outside the strategic centres and regeneration corridors should not be stifled.

Dudley Muslim Association recognised the need for regeneration in the four strategic centres, but was concerned that development be targeted at the most deprived communities in the region, wherever they were located.

*d. Green space and housing density*

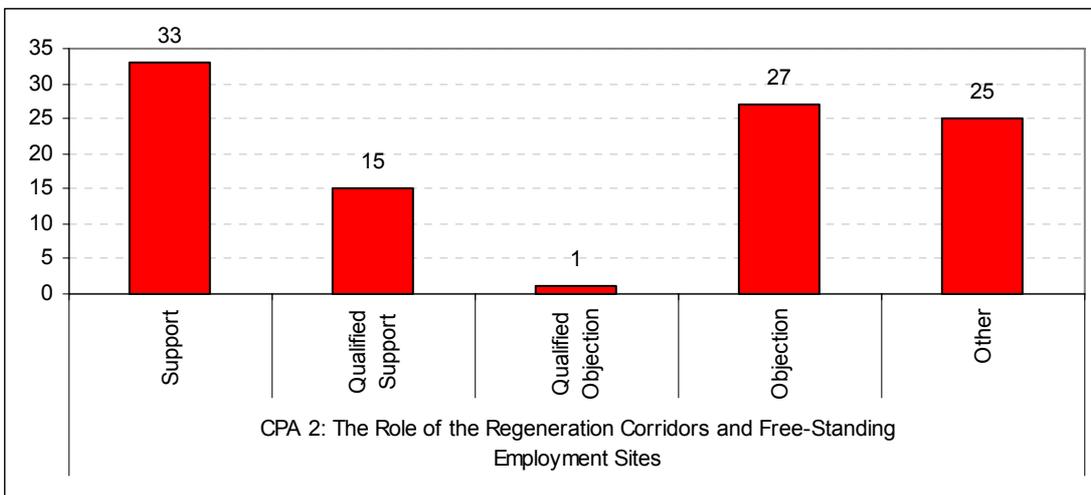
Some respondents – including private individuals and environmental groups – gave general support but stated that the provision of green space should be a primary concern within the development areas. On the density of housing, respondents were divided, with some welcoming the focus on high-density development, and others calling for a wider range of densities, including larger family homes.

Natural England submitted that they ‘would expect this core spatial policy to make clear reference to the provision of accessible natural greenspace as part of the sub-region’s green infrastructure network, particularly in terms of extent and general location and, moreover, this should be reflected in the relevant Strategic Centre diagrams.’

**CPA2 The Role of the Regeneration Corridors and Free-standing Employment Sites [101]**

*a. Overview*

CPA2 attracted 101 representations from the whole range of respondent types who participated in the consultation, making it the most popular CPA for comment. Many respondents expressed broad support for the principle of focussing development in regeneration corridors on brownfield land, and minimising development on greenfield sites, though some concerns were raised about the availability of sufficient land. Overall opinion was as follows:



**Figure 11. Points of view on CPA2**

Representations expressing support or qualified support outweighed those expressing objection or qualified objection, and ‘support’ was the most common opinion of this policy, with 33 representations, or approximately one-third of the total.

A considerable range of issues were raised in connection with this policy.

*b. Preferred options for regeneration corridors 1-16*

Many stakeholders commented in detail on the regeneration corridors.

- RC1: JG Land and Estates commented that if free-standing strategic employment sites were not provided outside the regeneration corridors, RC1 needed to recognise the opportunity for high quality employment land created by the M54/M6/M6 Toll link, and the ability to provide high quality RIS and logistics opportunities at the M6 Junction 11 location.
- RC4: Bilston Businesses Event submitted that businesses were currently in the RC4 area through choice, and that employment land should not be redeveloped for housing. They argued that a congestion charge might encourage businesses to leave. On the contrary, Bovale Ltd, Pemberstone and Persimmon Homes supported housing-led regeneration. British Waterways expressed an interest with regard to canal-side developments. CALA Homes objected to high-density housing in this corridor. A group response from Parkfield Bilston High School called for more green spaces and environmental improvements, increased public transport provision, and a revitalised town centre.
- RC6: CBRE Investors supported an employment-led approach to development in this corridor. National Grid Property (Holdings) Limited proposed land at St James Bridge, Darlaston, for housing development. Willenhall Regeneration Company Ltd supported Option 1 and saw this corridor as appropriate for a polycentric model.
- RC7: National Grid Property (Holdings) Limited requested that their land on the southern side of Walsall town centre in Pleck be considered for housing development.
- RC9: Barratt West Midlands supported housing development in this corridor, particularly on former employment land in canal-side locations. Bridgemere Properties Ltd and Mintworth Transport Ltd also backed housing development.
- RC10: Persimmon Homes saw housing development as particularly appropriate for RC10, based on its distance from the motorway network; they further advocated Green Belt review. They requested that the corridor be extended to include land south of Holbeache Lane.
- RC11: St Modwen Developments Ltd considered that Dudley's role as focus for tourism and cultural assets and major residential development should be more firmly embedded within the strategy.
- RC13: Tarmac Central Quarry Products supported the identification of this corridor for housing-led regeneration and proposed that the corridor be extended to increase housing provision. Cradley and Foxcot Labour Party raised concerns about high-density housing and the provision of supporting services; they argued that sufficient green spaces should be provided and that integrated transport strategies were needed.
- RC14: St Modwen Developments Ltd welcomed the inclusion of the Coombeswood Industrial Estate and argued that housing projections should be increased by 50-70 dwellings to reflect the potential of this site.
- RC15: Walsall Town Centre Management team and Shopmobility wanted to see rail links between Walsall and Wolverhampton promoted, and the town centre made a continued focus for investment.

- RC16: Persimmon Homes West Midlands supported housing-led development in this corridor. Respondents from the Wolverhampton consultation event called for derelict buildings to be dealt with and listed buildings preserved.

*c. Housing*

Housing development on redundant employment land was widely welcomed, especially by developers and landowners. Bovale Ltd and Bridgemere Properties Ltd suggested that the upper limit to such housing provision be removed. The Home Builders Federation Ltd argued that greenfield sites should not be discounted. Some developers such as Persimmon Homes West Midlands and William Davis Ltd supported lower housing densities in order to attract social groups A and B and prevent out-migration from the Black Country.

*d. Employment*

Advantage West Midlands offered support for the stated need to provide guidance and protection for free-standing employment sites. Barratt West Midlands Ltd stressed that quality employment sites were needed to attract investment, and that canal-side properties were particularly appropriate in this regard.

*e. Transport*

Brierley Hill Regeneration Partnership welcomed the policy and stated that a comprehensive transport policy was a priority. Centro was encouraged by the stated intention to focus intense development in accessible locations, well-served by public transport. West Midlands Friends of the Earth wanted to see mention of walking and cycling networks in this policy.

*f. Environmental issues*

Birmingham and Black Country Biodiversity Partnership argued for a separate policy on biodiversity to be included in the Core Strategy, since they did not feel that this issue was dealt with in sufficient detail. Natural England saw provision of green infrastructure as central to the success of the strategy: 'If the Regeneration Corridors are to play a full part in the transformation of the Black Country, then there is a need to identify what they will contribute to green infrastructure across the sub-region.' They argued that the document should therefore define the predicted area of green infrastructure that would be provided in terms of area and type, in similar fashion to definitions for housing and employment land.

English Heritage objected to what they saw as the 'inconsistent and poor treatment of the historic environment in setting out the current proposals for the strategic centres and regeneration corridors.'

**CPA3 Approach to Development outside the Strategic Centres and Regeneration Corridors (excluding free-standing employment sites) [27]**

27 representations were made on CPA3. The protection of Green Belt land met with differing opinions. A number of developers and landowners including Bellway Homes and William Davis Ltd, but also other organisations including Cannock Chase Council, expressed concern about the policy. They variously suggested that Green Belt boundaries should be reviewed; that protection of existing Green Belt designations should not be protected above all other considerations; and that ruling out greenfield development would not ensure an appropriate mix and quality of housing.

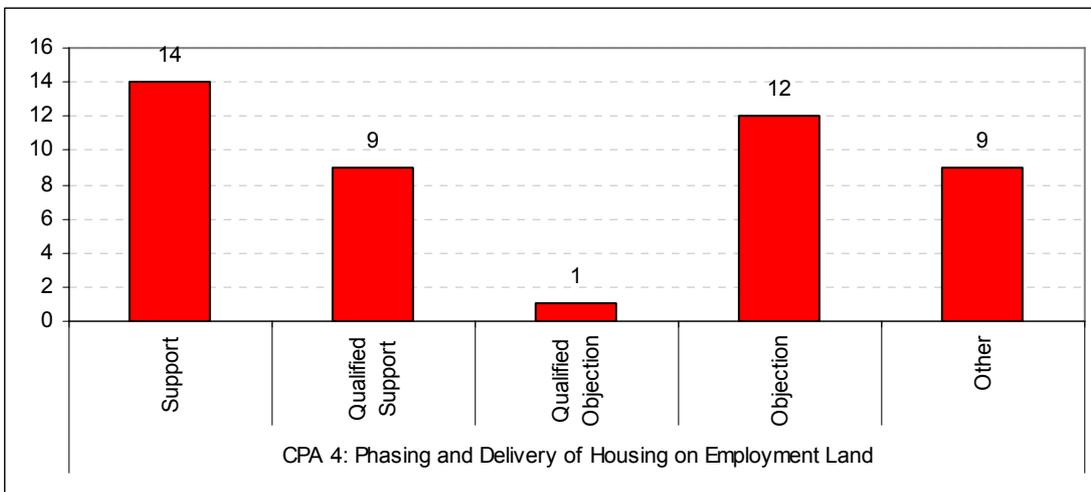
The alternative view was expressed by other organisations including environmental and heritage groups, the Environment Agency and also some developers and landowners, who supported the protection of Green Belt land and the emphasis on maintaining local character. Natural England stressed that green infrastructure must be identified at an early stage in order to ensure that it was not compromised by development. Government Office for the West Midlands wanted this latter point to be emphasised further, recommending that: ‘...the policy should set out in High Quality Residential Areas the promotion of new housing development only where it accords with local character.’ The Campaign to Protect Rural England wanted the Green Belt protection to go further, and ‘reference positive landscape improvement policies in addition to maintenance of boundaries and protection from inappropriate development.’ In a similar vein, English Heritage called for the enhancement of historic environments.

London and Cambridge Properties and Advantage West Midlands felt that employment sites should be included in this policy, and that more detail should be provided on the circumstances under which they could be developed outside the strategic centres and regeneration corridors. Centro stated that it should be an aspiration that all development sites were accessible by public transport. The Environment Agency welcomed the attention to flood risk, but called for a stand-alone policy on flood risk.

**CPA4 Phasing and Delivery of Housing on Employment Land [45]**

*a. Overview*

CPA4 received 45 representations, over half of them from private sector organisations. Opinion was fairly evenly split between support and objection.



**Figure 12. Points of view on CPA4**

Some respondents accepted the need for phasing, but argued that release of land for housing must be expedited. Others objected to the sequential approach, and argued for a flexible approach to bring forward employment land for housing. Similarly, several respondents argued that the phasing policy should not prevent redundant brownfield sites coming forward for housing development when available. Certain respondents, including Dudley Council, argued that the policy underestimated the difficulties of building on brownfield land.

*b. Employment land*

There were some concerns that by dedicating employment land to housing, insufficient employment land would be available to meet the needs of an enlarged population. For example, JG Land and Estates submitted, ‘We believe that the policy will not provide for sufficient levels of employment lands to meet the needs during the plan period. It is clear that there will be an associated increase in employment requirements and therefore the phasing and delivery policy should make additional employment provision. The policy base should be sufficiently flexible through provision of suitable and identified employment land sites, capable of being delivered over the plan period.’

In terms of the availability of redundant employment land, the Home Builders Federation objected to the lack of inclusion of the Employment Land Review from the evidence on which this policy was founded.

*c. Environment*

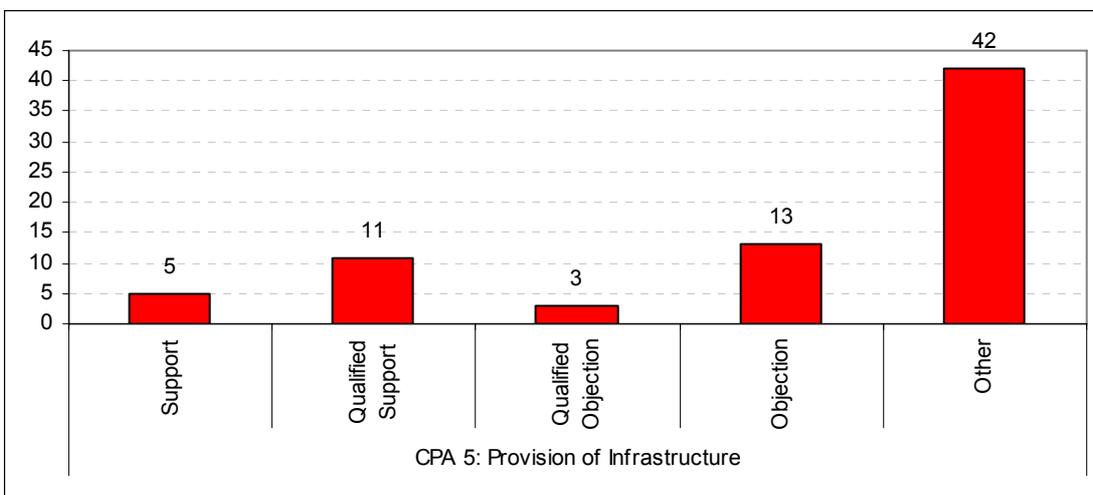
On environmental issues, English Heritage welcomed the inclusion of coordinated provision of environmental enhancement as part of the criteria set for determining phasing. The Environment Agency and infrastructure providers highlighted the need to plan for sufficient infrastructure provision in line with housing development.

British Waterways commented that environmental improvements would be needed as a backdrop to residential development. Thus, supporting research and canal/local area studies would need to be produced to pool and coordinate planning contributions for agreed works.

**CPA5 Provision of Infrastructure [74]**

*a. Overview*

This policy attracted a large volume of comment, 74 representations in total, and was the second most popular policy area for comment in the consultation. The majority of these (42) were categorised as ‘other’ since they made a comment or suggestion rather than expressing definite support or objection.



**Figure 13. Points of view on CPA5**

The general opinion of developers and landowners was that policies relating to infrastructure funding must conform to national planning policy; ensure that an equitable basis was established in the policy for requesting contributions; and ensure that any contributions sought related directly to the development. Certain respondents, such as Barratt West Midlands Ltd, argued that if a community infrastructure levy (CIL) was to be implemented, it should be the subject of full consultation, but others, such as Taylor Wimpey Developments Ltd, supported such an approach. Support was also given to an approach tailored to local conditions that would not constrain housing delivery.

A range of specific infrastructure issues were covered by representations on the policy.

*b. Water and drainage*

British Waterways argued that the inland waterway network should be eligible for CIL funding. The Inland Waterways Association objected that attention had not been paid to the rising water table, and suggested that sustainable urban drainage be considered a key infrastructure item. The Environment Agency urged early consultation with water companies, and called for a reference to the Strategic Flood Risk Assessment in the Core Strategy.

*c. Green infrastructure*

English Heritage welcomed the recognition given to the importance of considering environmental capacity when considering infrastructure requirements. Natural England urged that green infrastructure requirements be planned for at an early stage, and implemented alongside new development.

*d. Transport*

In terms of transport, Sandwell Metropolitan Borough Council commented that Highway Asset Management plans were required. National Express highlighted how improved public transport could facilitate new and intensified development, and free up existing highway capacity.

*e. Other*

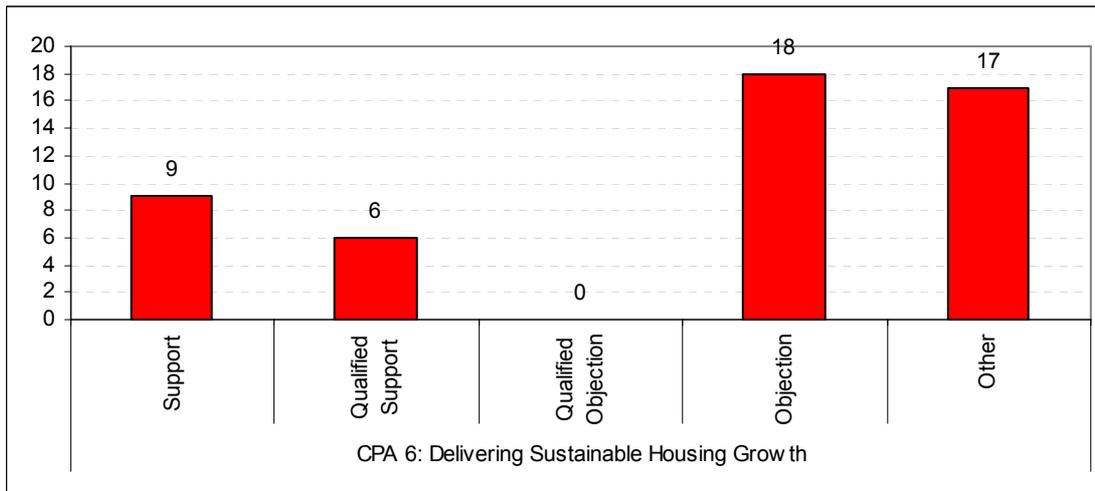
Attention was drawn to the need for additional health, leisure and other community facilities; this area was a popular theme of comment from individual respondents. Other areas addressed included waste management, mineral resources, retail facilities and heritage assets.

## **IV. Direction of Change 1 – Sustainable Communities (CPA 6-13)**

### **CPA6 Delivering Sustainable Housing Growth [50]**

*a. Overview*

Delivering sustainable housing growth was the subject of 50 representations. Support and qualified support were slightly outweighed by objection.



**Figure 14. Points of view on CPA6**

Among those who expressed an objection, a considerable number of respondents, especially developers and landowners, argued that the policy needed to be more flexible, particularly in respect of housing targets. They highlighted the likelihood that sub-regional housing targets would be increased as a result of the Phase Two Revision of the Regional Spatial Strategy; several submitted that the figure for net new homes should be replaced with this revised figure. Wolverhampton Development Company questioned how any further housing numbers required by the government would be allocated. Several respondents also stressed that the 61,200 figure should be treated as a minimum requirement.

*b. Brownfield development*

The figure of 95% housing on previously developed land was generally opposed by developers and landowners who saw it as unrealistic in terms of the availability of sufficient land, and supported by individuals and environmental groups. Wyrley Estates elaborated further: ‘The use of low grade industrial land may not be the most sustainable solution for development.’

*c. ‘Sustainable’ versus ‘sustained’*

The Environment Agency noted that the title of this policy was rather misleading. Rather than covering sustainable housing growth, which would incorporate policies for sustainable construction, low car use, etc. this was about ‘sustained housing growth’, and the title should be changed accordingly.

**CPA7 The Density of New Residential Development [33]**

CPA7 attracted 33 representations, of which half came from developers and landowners. Some developers and landowners respondents supported the policy, and welcomed the recognition that the best possible density should be achieved on site, reflecting the character of the surrounding area, and that density targets should be flexible. Others objected to the policy on the grounds that high-quality, low-density family homes were needed rather than further high-density development. Sometimes this involved promotion of a particular site, for example on the part of London and Cambridge Properties Ltd: ‘LCP supports the recognition of a need for lower density, high quality developments within certain areas of the Black Country, including the Tansey Green Road and Oak

Lane “opportunity” sites of the Pensnett – Kingswinford Regeneration Corridor, which are able to provide quality housing at a density of 40-60 dph net (average 35dph gross).’

Opinions amongst other respondent types were similarly mixed. In general, it was felt that density figures should be flexible. Where high-density development was supported, this was on the grounds of good access to public transport and local services, and that high density did not need to mean low quality.

Where high-density development was opposed, it was on the grounds that more family houses and a broader range of housing types more generally were needed in the Black Country. Some respondents argued that low-density development would lead to higher quality design, and that it was inappropriate to stipulate densities on a regional basis. Countrywide Property Holdings Plc argued for a common approach to good design to be adopted, and noted that differing local policies could result in differing development yields on sites.

### **CPA8 Tackling Areas of Low Demand [7]**

Only seven representations were made on CPA8. Some, such as Advantage West Midlands and RegenCo, simply expressed their support for the policy. The Campaign to Protect Rural England and West Midlands Friends of the Earth supported the principle of housing renovation and improvement. English Heritage advocated that an approach similar to that adopted in Birmingham and Sandwell be taken to the evidence base for identifying Housing Market Intervention areas: ‘In those areas extensive and intensive surveys of historical significance have been undertaken to inform decision making.’

### **CPA9 Provide a Well-balanced Range and Choice of Housing [35]**

This policy attracted 35 representations. Inclusion of a policy to support a well-balanced range and choice of housing was broadly welcomed, though the Home Builders Federation objected to the imposition of certain dwelling types and tenures. However, not all respondents felt that this had been adequately addressed in the Preferred Options document. For example, Harworth Estates submitted that not allowing greenfield development would not ensure an appropriate mix. Mintworth Transport Ltd agreed that more high quality housing was needed to attract social bands A and B to the Black Country. A similar opinion was expressed at a range of exhibitions and meetings held to gather the views of the public on the consultation, with comments including the need for more family houses and fewer apartments.

The Government Office for the West Midlands and Friends, Families and Travellers welcomed the fact that the Core Strategy would address the needs of gypsies and travellers; the latter was concerned about the timetable for provision. At the One Voice Event, respondents called for more housing for disabled people, and that this needed to be affordable. At consultation events, members of the public stressed that housing provision should meet the needs of the elderly and young people.

### **CPA10 Deliver Affordable Housing [30]**

The CPA on affordable housing received 30 representations. Just under half came from developers and landowners, with the remainder from a range of different respondent types.

Developers and landowners were united in their support for a locally specific affordable housing target (Option 4), considering a single target for the Black Country to be inappropriate. For example, William Davis submitted: ‘We believe that different levels and types of affordable housing will be needed in different locations and that creating locally specific targets will ensure the most appropriate targets are identified for different sites.’ Similarly, Ciel Properties stated: ‘In light of the vision and spatial objectives of the JCS it is considered that a locally specific approach to affordable housing targets is the most appropriate method of delivering affordable housing across the Black Country.’

Representations from other types of respondents were more likely to welcome the commitment to the provision of affordable housing. However, there was still a preference for targets to be set on a local or even site-by-site basis, with such comments submitted by waste management companies, regeneration partnerships and statutory environment bodies amongst others. Walsall Borough Strategic Partnership identified the need for the Core Strategy to deliver aspirational as well as affordable housing.

### **CPA11 Promote the Sustainable Location of Community and Sports Facilities [21]**

21 representations were made addressing CPA11. The majority of representations expressed support for this policy, sometimes stressing one particular area of interest. For example, Marston Plc welcomed the mention of pubs amongst community facilities. Dudley Zoological Society was concerned that there was no specific mention of tourism.

Specific caveats or provisos were added by a number of respondents. For example, Brierley Hill Regeneration Partnership was concerned that valuable land might be blighted by being safeguarded for community and sports facilities, thereby jeopardising development. Dudley Muslim Association hoped that facilities would be targeted at disadvantaged communities.

In terms of transport, Staffordshire Area of the Ramblers Association submitted that the policy did not promote sustainable, non-polluting modes of transport to community and sports facilities. Sandwell Primary Care Trust supported the location of facilities within walking distance of communities, and called for playgrounds to be located in the centre of towns. Walsall Disability Forum wanted the local authorities to ensure that such facilities were accessible to disabled people and accessibly located.

### **CPA12 To Provide Accessible Transport Networks and Establish Sustainable Accessibility Standards [43]**

CPA12 on accessible transport networks and sustainable accessibility standards received 43 representations, the majority supporting the policy. However, several respondents felt that the policy was insufficiently ambitious, including West Midlands Friends of the Earth, Ciel Properties and the Campaign to Protect Rural England. Similarly, Sandwell Metropolitan Borough Council commented that the policy was stronger on provision of public transport than strategies to increase its use. Looking for a broader, further-reaching policy, the Government Office for the West Midlands asked, ‘Has consideration been given to developing a Core Black Country Public Transport network linking the four strategic centres, the regeneration corridors and linking into key points in Birmingham and to other nearby sizable settlements such as Kidderminster and Cannock?’

Several developers and landowners requested that references to penalties be deleted. West Midlands Regional Assembly stressed, however, that developer contributions should be sought towards necessary transport infrastructure improvements.

On roads, the Highways Agency noted that the PRISM report on transport infrastructure needed to be updated, and expressed their willingness to co-fund this with the joint local authorities. National Express stated the need for specific, measurable, achievable, relevant and timed (SMART) objectives for personal and freight movement that match the Core Strategy.

### **CPA13      Cycling and Walking Networks [21]**

Cycling and walking networks attracted 21 representations. A substantial number of these came from environment and countryside groups.

Staffordshire Area of the Ramblers Association argued that the policy was too weak; it should call for a 'wholesale shift' rather than 'increased' cycling and walking. Though they supported longer cycle routes for leisure use, they felt that the priority was the creation of shorter routes for journeys from people's homes to places of work and shops. Whilst welcoming the policy on cycling and walking networks, the Campaign to Protect Rural England and West Midlands Friends of the Earth were concerned that the highway network should be made safe and accessible to pedestrians and cyclists.

The Campaign to Protect Rural England called for solutions 'which embrace "people-safe" housing layouts where cycling/walking is safe and vehicles are subordinated.' More specifically, Sandwell Primary Care Trust wanted to see a walking and cycling network between West Bromwich town centre and Dartmouth Park. British Waterways submitted that waterways provided valuable walking and cycling networks, and that opportunities for their upkeep and enhancement should be sought through Section 106 agreements.

## **V.      Direction of Change 2 – Environmental Transformation (CPA 14-24)**

### **CPA14      Ensuring High Quality Design in All New Development [28]**

This policy received 28 representations, including comments from developers and landowners, local government and private individuals and those attending consultation events. Encouraging high quality design was seen as an important factor that would ensure the successful regeneration of the Black County. The Government Office for the West Midlands recommended moving this policy to section 5 of the document, to underline this link with regeneration.

Several specific amendments and additions were suggested. Natural England submitted that they hoped to see sustainable design and construction encouraged. The Regional Conformity Panel for Minerals and Waste stated that this policy must take into consideration the Code for Sustainable Homes, site waste management plans and other sustainable design and construction requirements. The Environment Agency said that buildings and green space should be designed so as to mitigate against future climate change. Sport England suggested that for this policy to be sound, new development should encourage physical activity.

The Campaign to Protect Rural England argued that the principles of good design must be set by the planning authorities. Developers should not be allowed to pass judgement on their own designs

(for example, to decide whether the designs were ‘in harmony with the surrounding environment and neighbouring buildings’) since they had other priorities.

Specific proposals on quality design included sustainable construction and energy efficiency; incorporation of climate change prevention and mitigation measures; the use of local building materials and promotion of designs in keeping with local character and distinctiveness; the provision of open space and recreation areas; and the provision of secure bicycle storage.

### **CPA15      Protecting and Enhancing Local Character and Distinctiveness [18]**

18 representations dealt with this policy area. Brierley Hill Regeneration Partnership warned that protection of historic features must not jeopardise new development, but in general comments were more positive.

Natural England submitted: ‘The individual characteristics of each community should be preserved and enhanced to encourage a “sense of place” and this need should be reflected in the core policy, ensuring that all new development is locally distinctive and makes a positive contribution to the character of the area.’ Individuals also expressed support for the protection and enhancement of architectural heritage, alongside regeneration. However, the Campaign to Protect Rural England noted that it should not be assumed that ‘local character and distinctiveness’ would be attractive or worth protecting, and that such a policy should be suitably qualified.

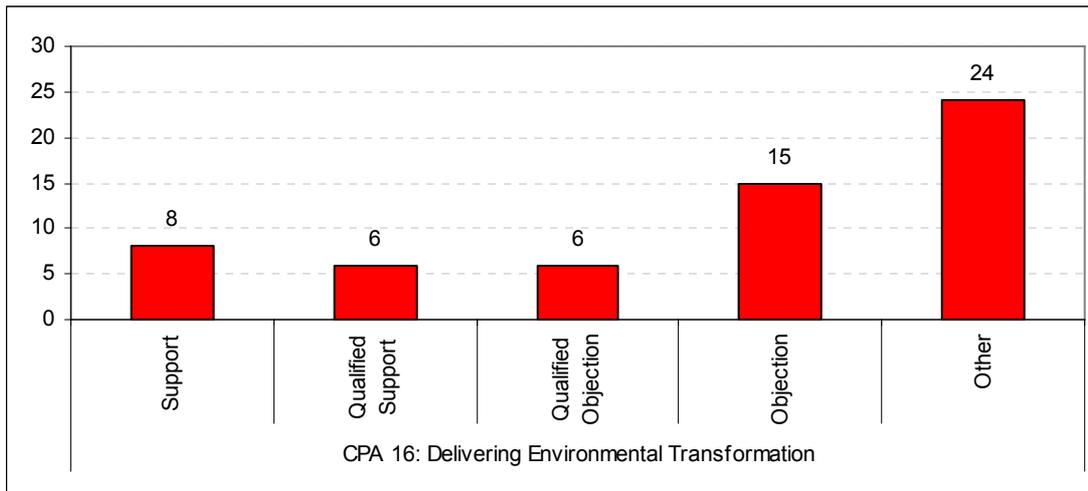
The Environment Agency expressed support for a policy requiring new development to make a positive and proportionate contribution towards the local environment, and suggested that creation and strengthening of the wildlife corridor network, sustainable water use, reuse and disposal were suitable areas of focus.

On waterways, Lapal Canal Trust argued that the whole canal network should be included under this policy, not just major legacy locations. An individual commented that reference should be made to the bid for World Heritage Status on the part of the Birmingham Canal Navigations. In terms of the character and distinctiveness of waterside development, British Waterways submitted that precedence should be given to development that made a positive feature of its canal-side location, and the benefits to be drawn from it.

### **CPA16      Delivering Environmental Transformation [59]**

#### *a. Overview*

This was another popular policy for comment (third in terms of the number of representations), attracting 59 representations. Many of these came from statutory environment bodies and environmental groups. The following graph shows the balance of opinion on CPA16.



**Figure 15. Points of view on CPA16**

Objection and qualified objection (21 representations) were the dominant opinion on this policy, against 14 representations expressing support and qualified support. However, the largest number of representations (24) were categorised as ‘other’ and commented rather than expressing a definite opinion.

*b. Evidence base and policy wording*

In terms of the evidence base, Advantage West Midlands noted that there was no reference to the ‘Black Country as Urban Park’ concept. Several respondents raised the Environmental Impact Assessment, and urged that it be incorporated into this CPA. More generally, several respondents felt that the policy wording was too vague, especially in terms of how it might be delivered, and additional environmental indicators were recommended, such as the number of buildings using sustainable local power sources. In particular, a range of respondents including BWEA, the Campaign to Protect Rural England, Inland Waterways Association, the Woodland Trust and Natural England called for a dedicated CPA on climate change.

*c. Green Belt, greenfield land and countryside*

Though environmental groups and individual respondents welcomed the stated support for Green Belt and greenfield land in the Preferred Options document, several developers and landowners objected to the lack of a Green Belt review. The representation from RICS West Midlands is an illustration of the support for this policy: ‘RICS endorses the importance attached to improving the quality of the Black Country environment for residents, investors and visitors alike. As with town centres, the commitment to proactive management of public spaces is essential to avoid general or localised deterioration of such assets.’

The Campaign to Protect Rural England objected that there was no specific reference to protection of the countryside in the Black Country. There was support for the establishment and protection of wildlife corridors, for example along the canal network, from several respondents. The Woodland Trust wanted to see policies on green infrastructure encompass accessible green space including woodland.

English Heritage did not feel that the historic environment was given enough prominence: ‘It is English Heritage’s position that green infrastructure planning should include the protection,

enhancement and management of the historic environment as an integral strand of its planning and delivery.’

*d. Water*

A private individual called for a flood protection strategy that would prevent the paving over of gardens with impermeable surfaces, sustainable urban drainage schemes and provision of rainwater harvesting and grey water recycling. The Coal Authority submitted, ‘We support the view that all development will need to contribute to the provision of green infrastructure. We also consider there are great opportunities to improve the quality of the environment by integrating surface water management infrastructure into development. In particular there are opportunities to open up and naturalise culverted streams and rivers. These would provide attractive environmental features as well as helping to manage pollution and mitigate flood risk.’

*e. Biodiversity and geodiversity*

Protected and enhanced biodiversity and geodiversity were supported by a number of organisations, including Birmingham and Black Country Biodiversity Partnership, Black Country Geodiversity Partnership, The Wildlife Trust for Birmingham and the Black Country and Natural England. The Woodland Trust argued that ancient woodland should be amongst the biodiversity action plan (BAP) habitats protected.

### **CPA17 Delivering Sustainable and Energy Efficient Construction [31]**

Sustainable and energy-efficient construction was the subject of 31 representations, 14 of them from developers and landowners, and the majority of others from statutory environment bodies and environmental groups.

In general, developers and landowners argued that such guidance should be issued by national government, not the Black Country Core Strategy. They added that meeting the Code for Sustainable Homes level 3 should be the maximum requirement and that level 4 was too onerous a target. Particular concerns were expressed that this policy would prevent suitable sites from coming forward due to the significant associated costs. However, a number of other developers and landowners noted the targets and submitted that their proposed developments would meet them; these included Barratt West Midlands Ltd, JC Land and Estates and Persimmon Homes West Midlands.

Statutory environment bodies including English Heritage, Natural England and the Environment Agency welcomed the policy, though the Environment Agency was disappointed that it did not address wider resource efficiency issues and seemed to focus exclusively on energy. The Regional Conformity Panel for Minerals and Waste also commented that energy efficiency was emphasised, despite the title including ‘sustainable construction’ and called for a broader approach. Environmental groups were also supportive, though West Midlands Friends of the Earth wanted the policy to go further and aim higher, and also stressed the need to ensure that existing buildings and infrastructure were brought up to standard.

### **CPA18 Renewable Energy [35]**

35 representations were made regarding renewable energy. The opinion of Bovale Ltd was representative of that of most developers and landowners: ‘Flexibility should be built in so that reduced renewable energy can be provided on sites with financial constraints.’ Developers were

concerned that the targets mentioned in the policy would render many potential development sites economically unviable. Such respondents also submitted that the policy should adhere to national governmental guidelines on the use of renewable energy in new development. The Home Builders Federation argued that renewable energy should not be made a higher priority than building homes, and objected to a regional policy on this subject.

Some specific comments were made regarding types of renewable energy. Advantage West Midlands suggested that the policy refer to low-carbon as well as renewable energy, so as not to rule out schemes such as gas-powered CHP. British Waterways supported the use of water in heat exchangers for heating and cooling. However, the Inland Waterway Association (Lichfield Branch) urged caution over the use of canals for heat extraction, since this could upset local ecology and suppress species productivity and diversity. SITA UK called for a greater emphasis on energy from waste, a stance supported by West Midlands Friends of the Earth who objected that no organic resources should be going to landfill or incineration.

The Regional Conformity Panel on Minerals and Waste noted that there was no cross-reference to the policy on energy efficiency, whilst the Campaign to Protect Rural England felt that the broader field of energy conservation and renewable energy production should be embraced within a wider policy.

#### **CPA19      Safeguarding the Black Country's Mineral Resources [18]**

This policy was commented on by minerals companies, local government and environmental groups, a total of 18 representations. The economic importance of minerals to the Black Country was stressed, and a policy to safeguard such resources generally welcomed. However, some respondents suggested that assessing sites individually rather than applying arbitrary thresholds would be a better approach.

Environmental groups argued strongly that biodiversity and geodiversity should be protected and enhanced in mineral working areas. It was noted by The Coal Authority that there was no reference to risks from ground stability, surface hazards and other physical changes in the environment which can arise following mineral workings.

One respondent questioned whether so many individual policies on minerals were necessary, and it was suggested that the mapping was too detailed to be useful, and that it was unnecessary to show individual minerals.

#### **CPA20      Maintaining a Continued Supply of Aggregate Minerals in the Black Country [11]**

The 11 representations on this policy were made by a sub-set of respondents to CPA 19. The Regional Conformity Panel for Minerals and Waste did not believe that the document addressed the contribution of the West Midlands to dealing with the sub-regional apportionment of aggregates, a position also held by the Quarry Products Association.

The Council for the Protection of Rural England argued that this policy should be to minimise the use of mined aggregates, whilst West Midlands Friends of the Earth called for a greater focus on the use of secondary or recycled aggregates.

**CPA21 Supply of Clay to Brickworks [11]**

This policy was the subject of 11 representations; most of the eight respondents who submitted them also responded to CPA19. The safeguarding of brick clay sources was welcomed, though which brickworks the policy covered was questioned. Support was given to the sustainable transportation of clay to brickworks, and canal transport raised as a possibility. The potential role of recycled bricks was raised.

**CPA22 Energy Minerals [10]**

Amongst the 10 representations on CPA22, opinions were divided on energy minerals, with minerals companies welcoming the policy while environmental groups such as West Midlands Friends of the Earth stated that they would 'wish to see existing coal reserves remain in the ground,' and highlighted the issue of climate change and the need to use resources efficiently. UK Coal Producers, however, argued: 'Modern operating and restoration practices are specifically designed to minimise any environmental impacts and the end result can often be an enhanced environmental outcome. It is important not to prejudge any potential application.'

Cannock Chase District Council took the middle view, supporting coal extraction where it would not damage existing communities or environmental assets. There was general support for the statement on Yorks Bridge.

**CPA23 Natural Building Stone [8]**

Extraction of natural building stone from local resources was seen as appropriate by the majority of the eight representations on this policy, from both local government and environmental organisations. The Black Country Geodiversity Partnership commented that there were small areas in the Bilston area where Coal Measures sandstones were extracted as building stone and these would merit further investigation to determine their worth or feasibility.

**CPA24 Prudent Use of Mineral Resources [13]**

This policy was widely welcomed by the 13 representations, though it was suggested by the Regional Conformity Panel for Minerals and Waste and West Midlands Friends of the Earth that it should precede other minerals policies since its principles informed them. Advantage West Midlands called for an economic impact assessment. In terms of sustainable transportation, British Waterways proposed some sites that could be accessed by inland waterways, an approach supported by the Inland Waterways Association.

The Regional Conformity Panel questioned whether the processing and treatment of contaminated soils should be determined under this policy. The Campaign to Protect Rural England again highlighted the need to minimise the use of mined aggregates to avoid environmental degradation.

## **VI. Direction of Change 3 – Economic Prosperity (CPA 25-43)**

### **CPA25 The Importance of the Black Country Centres for the Regeneration Strategy [30]**

CPA25 received 30 representations; in general, these were supportive of the strategy. That development should be directed towards the four strategic centres was welcomed by a range of respondents, including developers and landowners (e.g. Brierley Hills Estates), statutory environment bodies (e.g. British Waterways) and county councils (e.g. South Staffordshire County Council).

In terms of other levels of the hierarchy, Abstract Group felt that the second tier should be further divided into two levels, since larger centres played a different role to smaller centres. Dudley Council agreed that there should be an additional tier, and Hagley Parish Council argued that the hierarchy would need to be used flexibly. However, Coventry City Council did not believe that it was necessary to go down to the detail of small district/local centres in such a strategy.

A small number of representations mentioned Dudley in particular. Portexcept Ltd noted that Dudley's new role had not been specified, and West Midlands Friends of the Earth suggested that Dudley was a strategic centre.

Several comments were made on this policy by retailers. Asda Stores Ltd argued that the policy should refer to the provision of convenience floor space throughout the Black Country to meet local needs. WM Morrison Supermarkets Plc wanted the Charterfields shopping centre at Stallings Lane, Dudley, to be included in the proposed hierarchy as a small district centre. Tesco Ltd argued that development should be focused on Walsall, West Bromwich and Wolverhampton above Brierley Hill on the basis of the significant regeneration needs of these three centres.

### **CPA26 Directing the RSS Comparison Retail and Office Development Requirements to the Strategic Centres [21]**

The 21 representations on this policy came largely from developers and landowners, retailers and district and borough councils. Some respondents welcomed this policy warmly, such as London and Cambridge Properties Ltd who agreed with the reactive criteria-based approach to managing retail development, since they felt that this would allow a detailed assessment of individual schemes, taking into account location, impact and need.

Other respondents (e.g. Advantage West Midlands and Brierley Hills Estates Ltd) welcomed the policy, but with the caveat that development opportunities should not be lost or unnecessarily delayed as a result, and that it might sometimes be necessary to locate office development in out-of-centre locations. Brierley Hills Regeneration Partnership went further and objected to constraints being placed on private sector investment. Westfield Shoppingtowns Ltd argued that the policy was over-complex and inconsistent with Panel Report on the RSS Phase 1 Examination.

Two comments were made about the structure of the consultation document itself. The Government Office for the West Midlands and Coventry City Council suggested that this policy should be included within CPA1.

**CPA27 The Smaller Town and Large District Centres [19]**

19 representations were made on this policy. Many of them were supportive of the proposed provision of local shopping needs. West Midlands Friends of the Earth suggested an additional clause to support independent stores. The Theatres Trust added that the policy should include protection and enhancement of existing facilities. The Campaign to Protect Rural England supported this policy on the basis of sustainability and the promotion of local neighbourhood identity, and stated that this was as important as economic arguments. Advantage West Midlands supported the policy with the proviso that development was appropriate to the size and scale of the centre, and that it did not have an adverse impact on any other centre.

RICS West Midlands was less welcoming of the policy, and objected that setting limits for schemes in smaller town and large district centres was unnecessarily restrictive; any limits to sizes of schemes should apply equally across all centres. Somerfield Stores Ltd made a similar argument, pointing out that the amount and location of new floorspace should be consistent with the additional quantitative need arising from population growth. Abstract Group objected to the 5,000 sq m cap on office development outside the strategic centres, since this could make an important contribution to the economy.

London and Cambridge Properties Ltd and St. Modwen Developments Ltd called for Dudley's 'special role' to be clearly acknowledged in the Core Strategy.

**CPA28 Smaller District Centres and Local Centres [10]**

Just 10 representations were made on CPA28. Several objections were made. Tesco Stores Ltd argued that the policy should encourage investment in the smaller centres, and that the convenience and comparison retail floorspace thresholds should be removed. London and Cambridge Properties Ltd, Planning Prospects Ltd and RICS West Midlands also disagreed with these figures, arguing against a blanket cap on convenience shopping. Such decisions should be made on a case-by-case basis, they argued, taking into account the specific characteristics of an individual centre.

**CPA29 Meeting Local Needs for Shopping and Services [14]**

This policy was widely supported by the 14 representations made on it. Respondents agreed that it would help to promote sustainable communities and sustainable transport options. Provisos included a request to detail what 'local need' constituted, and for a distinction to be made between new and replacement facilities.

Barratt West Midlands Ltd highlighted the potential to provide local shopping facilities as part of the RC9 development. Mintworth Transport Ltd submitted the same, suggesting its land at Rattlechain between Dudley, Great Bridge, Tipton and Oldbury centres, whilst Persimmon Homes West Midlands highlighted the proximity of the Kingswinford district centre to its land at Holbeache Lane, Dudley.

**CPA30 Controlling Edge-of-centre and Out-of-centre Developments [16]**

CPA30 was addressed by 16 representations. The dominant response was to support the 'centres first' principle, but to stress that there might be a need for edge-of-centre or out-of-centre development when appropriate town centre sites were unavailable. RegenCo Sandwell warned that strong policies would be needed to ensure that further out-of-centre development was not

permitted, and RICS West Midlands stressed that it was essential that the local authorities ensured that sufficient land and development opportunities came forward in the centres to meet the substantial growth projections.

Dudley and West Midlands Zoological Society commented that tourist attractions were often outside centres by their very nature, and considered that this policy should make reference to land use to avoid stifling development and growth of such assets. Dudley Muslim Association argued that edge-of-centre and out-of-centre development should be permitted where they supported the needs of deprived communities

### **CPA31 Providing the Transport Requirements to Support the Strategy [29]**

29 representations were made on CPA31. Investment in public transport was broadly welcomed. West Midlands Friends of the Earth felt that this policy should go further, and cycling and walking should be promoted as the transport mode of first choice across the sub-region. Staffordshire Area of the Ramblers Association also wanted much further-reaching improvements to walking and cycling routes.

In terms of implementation, the West Midlands Regional Assembly was concerned whether the improvements had been prioritised and whether they were likely to be delivered within the timeframe of the Core Strategy. A number of respondents highlighted cross-border issues within transport provision. The Highways Agency stressed the need to consider resource availability and developer contributions to infrastructure improvements.

Though the Brierley Hill Regeneration Partnership and National Express supported Metro, both highlighted that it was just one of a range of transport choices, and that for short journeys, the bus would remain the dominant mode of public transport.

### **CPA32 Establishing Parking Standards [8]**

Only eight representations were made on this policy, but they included a range of different respondent types including local government, retailers, transport providers, environmental groups and developers and landowners.

Environmental groups welcomed the policy and the proposal of a parking charge policy. Others such as Tesco Stores Ltd accepted the policy in principle, but argued that the needs of vulnerable centres should be taken into account. Hagley Parish Council argued that public transport needed to be in place before parking restrictions were implemented.

### **CPA33 Improving the Highway Network [17]**

Respondents to this policy included transport providers, environment and countryside groups, developers and landowners, and local government; they made 17 representations. Many of these called for greater detail, highlighting specific improvements and their implementation.

On motorways, the Highways Agency stated that development near motorway junctions must be such that congestion of the strategic road network was not worsened. Sandwell Metropolitan Borough Council warned that enhancing motorway capacity would increase pressure on connecting routes. JG Land and Estates submitted that the M54/M6/M6 toll road should be recognised as a strategic road proposal.

On other roads, London and Cambridge Properties requested a greater commitment to the provision of a Pensnett Link Road from the Pensnett Estate to Russell's Hall. The Campaign to Protect Rural England stated their objection to a Brownhills Eastern bypass in RC15.

Staffordshire Area of the Ramblers' Association called for a specific policy commitment to enhance the road network for the use of public transport, pedestrians and cyclists. A 20mph speed limit across the sub-region was proposed by West Midlands Friends of the Earth.

#### **CPA34 Support the Effective Network of Freight [17]**

Most of the 17 representations on this policy welcomed it, though there was disagreement over the appropriate mode of transport for freight. JG Land and Estates stated that the primary mechanism was by road, and that insufficient importance was attached to this in the document. Likewise, National Express called for highways improvements to facilitate the movement of freight by road. West Midlands Amenity Societies Association posited the idea of 'freight only' road links between major commercial developments and the main highways network.

On the other hand, Sandwell Metropolitan Borough Council felt that rail could have much greater benefits than using the canal network, a mechanism also supported by West Midlands Friends of the Earth, but canal use was supported by British Waterways and the Inland Waterways Association.

Unite the Union objected that sufficient secure parking for heavy goods vehicles had not been provided for in the Preferred Options Document, and stressed that this was necessary to encourage industry.

#### **CPA35 Provision for Economic Growth [23]**

CPA35 attracted 23 representations. Representations from individuals tended to be about jobs *per se* rather than employment land, which was the subject of the majority of representations from organisations. There was some concern that there would be insufficient employment for new occupants, and the importance of accessibility to employment opportunities was highlighted. Wolverhampton Over 50's Forum stressed the problem of unemployment, and argued that investment should be directed to areas where this was particularly high.

In terms of the types of land to be developed, JG Land and Estates highlighted up to 80ha of high quality employment land at the M6 Junction 11 site, arguing that greenfield land on the edge of and highly accessible to the urban area would need to be identified in the Core Strategy to address deficiencies in the supply of high quality employment land, an opinion shared by Persimmon Homes West Midlands. The same respondent stressed the importance of cross-border working to meet employment land needs.

Birmingham City Council noted that developers promoting sites for logistics would want to see stronger references to supporting a Regional Logistics Site in the Black Country, and this position was indeed taken by RICS West Midlands. On the contrary, RegenCO Sandwell and the Campaign to Protect Rural England were unsure whether a logistics site would provide significant added value.

In terms of the consultation documentation, the Government Office for the West Midlands suggested that the policy be renamed as 'Providing for Employment Land Needs' and West Midlands Friends of the Earth suggested 'Provision for Economic Activity' rather than 'growth'. A

few respondents stated that the document should make clear whether figures refer to existing or proposed employment sites.

### **CPA36 Provision of High Quality Employment Land [28]**

28 representations were made on the policy on the provision of high quality employment land, over half by private sector organisations. Other respondents were local government and environmental groups.

Private sector organisations welcomed a policy protecting high quality employment land. However, JG Land and Estates felt that more employment land than currently proposed would need to be provided to match housing projections in the Black Country. They argued that requiring high quality employment land to be close to an existing or proposed knowledge cluster was too prescriptive, and that proximity to a local employment base should be sufficient.

On more specific areas, RICS West Midlands recommended elaboration of the policy in respect of B1 office development in employment areas. Byrne Properties objected to the limit of 10% warehousing within large developments. London and Cambridge Properties Ltd wanted to see the criteria for high quality employment areas applied to existing as well as new sites. The Campaign to Protect Rural England argued that employment facilities should be required to create their own 'high quality' environment, not rely on existing greenfield space.

RegenCo Sandwell, West Midlands Friends of the Earth and Cannock Chase District Council all promoted sustainable transport provision to high quality employment sites. This should include access by walking, cycling and public transport.

A few respondents stated that Table 7 was unclear and should be amended. National Express objected that the definition of 'high quality employment land' was ambiguous, and that this might cause difficulties in the measurement of employment of land for employment purposes.

### **CPA37 Providing and Safeguarding Local Employment Land [20]**

20 representations were received, 15 of them from developers and landowners and other private sector organisations. The overriding response was support for the principle of providing and safeguarding local employment land, but wanting a proviso that sites found unsuitable for local employment land should be able to come forward for alternative uses. Persimmon Homes West Midlands stated, 'The policy needs to be sufficiently clear to reduce the potential for planning appeals over the interpretation of criteria where residential redevelopment is proposed.' This opinion was shared by a number of developers and landowners.

Representations from individuals and those attending consultation events supported the provision of employment close to people's homes. Several suggested that job opportunities and training should be made available to local people on a preferential basis.

### **CPA38 Providing for Offices and Services [9]**

This policy was supported by the majority of the nine respondents who addressed it, but objected to by Abstract Group who considered it too restrictive, and the Campaign to Protect Rural England on the grounds of traffic congestion at peak times. National Express supported taking the policy one step further: '...supporting the relocation of existing office premises into centres, in particular

where these have high employment densities, rather than just trying to restrain the extent of ‘in situ’ expansion.’

### **CPA39 Clustering of High Technology Business [7]**

This policy was broadly supported by the seven representations made on it, though RICS West Midlands suggested that it was incompatible with other policies for B1 (a) location which could be essential to clusters.

Other respondents highlighted the need for a flexible approach to the location of cluster opportunities, ensuring that ‘difficult’ areas were not neglected. West Midlands Friends of the Earth advocated extending the policy to include environmental technologies as well as high tech companies. The Government Office for the West Midlands wanted to see more evidence of where the research hubs were.

### **CPA40 Improving Access to the Labour Market [10]**

This policy was welcomed in the 10 representations, though opinions as to how it could be achieved varied. Cannock Chase District Council highlighted the importance of cross-border working: ‘It is important to recognise that communities which are local to particular areas of employment are not necessarily contained within administrative boundaries.’ Advantage West Midlands focused on skills and training, and linking these to local employment opportunities. Barratt West Midlands Ltd considered that high-quality residential development would reduce the need for in-commuting to the Black Country employment centres.

The importance of transport was mentioned by a few respondents. West Midlands Friends of the Earth suggested that: ‘Transport problems are a major constraint on accessing employment, especially for low paid workers.’ JG Land and Estates called for a major new road infrastructure scheme to improve connectivity with the motorway network, thus relieving congestion and enabling more efficient bus services. However, UK Coal Plc objected that by concentrating employment in centres and corridors, access was difficult for residents in peripheral areas.

### **CPA41 Addressing the Black Country’s Waste and Resource Management Requirements [18]**

Respondents who addressed the three policies on waste management included waste management companies, local government and environmental groups. 18 representations were made on CPA41. The policy was welcomed by organisations including Biffa Waste Management Ltd, JPE Earth and Aggregates Solutions and Worcestershire County Council.

SITA UK stated that in order to meet requirements for waste facilities, it would be necessary to safeguard sites for future expansion. British Waterways was concerned about problems arising from charging for commercial waste. Staffordshire County Council highlighted the need to assess cross-border movements of waste.

Environmental groups were keen to shift the emphasis away from waste production, and towards reducing and recycling it. The Campaign to Protect Rural England suggested that the policy should identify a ‘waste hierarchy’, with recycling prioritised over incineration, and smaller schemes over larger ones. A similar sentiment was expressed by a private individual, who called for a ‘zero waste’ policy for new development, including sustainable drainage systems.

**CPA42 Location of New Waste and Resource Management Facilities [13]**

13 representations were made on CPA42, generally in support of the policy. Biffa Waste Services Ltd and SITA UK welcomed the policy and the specified locations for facilities. However, Advantage West Midlands stressed the need for flexibility and supported mixed-technology development. JPE Earth and Aggregates Solutions felt that the policy should not be so prescriptive with regard to locations at this stage, and a similar stance was taken by the Regional Conformity Panel for Minerals and Waste, who commented that it might be necessary to look elsewhere if sites were not deliverable in these locations, and that this might entail collocation of facilities or working in partnership with authorities outside the Black Country. West Midlands Friends of the Earth particularly supported the local processing of waste; Natural England commented that it was important that waste management minimised impacts on the environment, avoiding areas important to biodiversity and geodiversity.

In terms of more detailed or specific representations, Councillors Anthony Harris, Keith Sears and Mike Flower of Walsall Council raised concerns about the proposed landfill sites at Aldridge North and Walsall Wood since there were already quarries at Shire Oak and Vigo Utopia, and they feared for additional disruption to quality of life within the ward. The Government Office for the West Midlands submitted that the Resource Recovery Park in RCB Hill Top should be identified on the Key Diagram. SITA UK proposed additional sites for enhanced waste management facilities: Wolverhampton waste transfer facility, and Tipton depot.

**CPA43 Waste Disposal [11]**

Of the 11 representations made on this policy, the majority addressed the issue of landfill; the Government Office for the West Midlands submitted that the word 'landfill' should be added to the policy title. Biffa Waste Services Ltd welcomed the continued recognition of the need for landfill disposal capacity, and SITA UK noted that landfill was the principal form of waste management after recycling. Sandwell Metropolitan Borough Council requested that a statement be added to the effect that waste would continue to be landfilled if no alternative existed. The Inland Waterways Association advocated the movement of waste for landfill using the canal network.

The Environment Agency took the different view that though landfill probably needed to be included in the strategy, this should be as part of an overall mix of waste disposal options, and that landfill should not be relied upon for waste management. Advantage West Midlands called for a more ambitious policy on landfill that specified that zero landfill of recyclable and organic materials would be acceptable. West Midlands Friends of the Earth stressed that waste was never 'disposed of', simply redistributed as recycled materials or pollution.

**This Consultation Response Analysis was produced by Ubiquis (+44 (0) 20 7269 0370)**

## **Appendix: Supplementary Information**

Some respondents supplied supplementary information with their response to the consultation, such as maps and site plans.

- English Heritage – further information on monitoring
- J. Hill (private individual) – map of land owned by the respondent
- Mr Hughes and Mr Hawkins (private individuals) – map of land owned by the respondents
- Mrs F Johnson (private individual) – map of land owned by the respondent
- JG Land and Estates – maps
- Mintworth Transport Ltd – map of land owned by the respondent
- Midland & Regional Ltd – maps
- WM Morrison Supermarkets Plc – site plans of Charterfields Shopping Centre; planning history summary; drive time plan and population data.
- National Grid – list of National Grid infrastructure within the Black Country Authorities administrative area (electricity transmission and gas distribution)
- National Grid Property (Holdings) Ltd – maps of land owned by respondent
- Natural England – list of detailed amendments to Monitoring Framework indicators 44, 45 and 47; list of detailed areas that CPA 16 should address
- Persimmon Homes West Midlands – map of land owned by respondent
- Mr B Rogerson (private individual) – map
- Sandwell Primary Care Trust – list of WHO principles for healthy planning; map of distances from home to sustainable facilities; further details of proposed hospital
- Taylor Wimpney – detailed statement of objection to paragraph 4.30 setting out reasons for rejection of greenfield extensions
- Tarmac Central Quarry Products – map of proposed extension and tables of new housing figures
- Woodland Trust – woodland access standard
- Westfield Shoppingtowns Ltd – detailed rewording for CPA26
- Centro – list of objectives for local development frameworks in the West Midlands

- John and Katie Cresswell-Plant (private individuals) – outline of economic contribution of disabled people; approaches to disability planning; independent living vs institutionalisation (all with particular relation to the Black Country); population projections for general population and disabled people
- Barratt West Midlands Ltd – map of land owned by respondent
- The Wildlife Trust for Birmingham and the Black Country – detailed information on biodiversity and geodiversity