

BLACK COUNTRY CORE STRATEGY PREFERRED OPTIONS (MARCH 2008)

SUMMARY OF COMMENTS AND HOW THEY HAVE BEEN ADDRESSED

Core Spatial Policies CSP3 - CSP 5

Subject	Summary of Comments	How Addressed
<p>CSP3 – Development Outside the Regeneration Corridors and Strategic Centres</p>	<ul style="list-style-type: none"> • The proposed approach to development outside the Strategic Centres and Regeneration Corridors is supported and policies that clearly set out the approach and roles of these areas should be included. • Policy should recognise that there will be some need for employment outside the strategic areas, including business start ups in residential areas. • Flexibility is needed where sustainable sites can be brought forward outside of centres and corridors. 	<ul style="list-style-type: none"> • Publication Policy CSP2 confirms the approach to development outside the growth network. • Publication Policy CSP2 refers to the role of free standing employment sites outside the growth network to provide employment opportunities. • Publication Policy CSP2 provides an appropriate level of guidance on development opportunities outside the growth network.

Subject	Summary of Comments	How Addressed
	<ul style="list-style-type: none"> • Green belt boundaries should be reviewed. It is unacceptable to rely on windfall sites in a Policy framework • The Policy should refer to a review of the inner boundary to the Green Belt to assist in the provision of land for housing to meet the need for a broad mix of sites. • Support for strong green belt and local character emphasis • In addition to flood land, flooding covers water / drainage management from rainfall to discharge to the sea. 	<ul style="list-style-type: none"> • The Regional Spatial Strategy provides no remit to review Green Belt boundaries. • The Regional Spatial Strategy provides no remit to review Green Belt boundaries. • Publication Policy CSP2 confirms that Green-Belt boundaries will be maintained and protected from inappropriate development. • Publication Policy ENV5 addresses these issues based on the work carried out for the Strategic Flood Risk Assessment and for the Outline Water Cycle Study and Scoping Water Management Plan for the Black Country..

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	<ul style="list-style-type: none"> • Green belt provision should reference positive landscape improvement policies in addition to maintenance of boundaries. • Not allowing Greenfield development will not ensure an appropriate mix of housing. • 'high quality residential areas' should refer to the creation of new forms of quality. Such areas do not always need to be low density. • The policy should set out that in high quality residential areas new housing development will only be promoted where it accords with local character. • It should be aspirational that all developments are accessible by 	<ul style="list-style-type: none"> • This will be addressed through the Environmental Infrastructure Guidance • The Regional Spatial Strategy provides no remit to review Green Belt boundaries. • Publication Policy ENV2 refers to the need to protect and promote the special character, historic character and local distinctiveness of the Black Country which includes a range of different character types. • Publication Policy ENV2 refers to the need to protect and promote the special character, historic character and local distinctiveness of the Black Country which includes a range of different character types. • Publication Policy CSP5 sets out the transport strategy to

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	<p>public transport.</p> <ul style="list-style-type: none"> • Relevant historic environment opportunities should be drawn out. • A standalone policy on flood risk is needed. • Welcome for the commitment to the provision of a strong network of green infrastructure but this must be identified at a 	<p>support new development. This includes a commitment to the promotion of sustainable transport modes.</p> <ul style="list-style-type: none"> • Publication Policy ENV2 requires all proposals to sustain and reinforce special character and conserve the historic aspects of locally distinctive elements of the Black Country. Design and Access statements will be required to set out how all aspects of local character and distinctiveness of the locality have been fully assessed to inform new development proposals. • Addressed by Publication Policy ENV5. • Phase 1 of the EIG provides the strategic context for policies on Environmental Infrastructure as set out in Publication Policies

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	<p data-bbox="898 368 1121 399">very early stage.</p> <ul data-bbox="856 678 1325 1300" style="list-style-type: none"> <li data-bbox="856 678 1325 846">• If land at Holbeache Lane is not included within RC then CSP3 should recognise this area is a prime location for residential and employment development. <li data-bbox="856 1263 1230 1300">• Support the key diagram 	<p data-bbox="1486 368 1877 570">ENV1-8. Phase 2 of the EIG has commenced and this will develop these proposals in more detail to inform Area Action Plans and Site Allocations Documents.</p> <ul data-bbox="1444 691 1919 1287" style="list-style-type: none"> <li data-bbox="1444 691 1919 1203">• The site is designated within the Green Belt. The Black Country Core Strategy does not propose to alter the green belt boundary or include any urban extensions as part of the development strategy. There are sufficient sites identified within the urban areas of the Black Country to accommodate the proposed housing requirements within the Core Strategy without the need to consider any urban extensions or incursions into the Green Belt. <li data-bbox="1444 1255 1577 1287">• Noted.

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	<p>identification of more than 1,000 dwellings to the north-west of Tame Bridge Railway Station (northwest of M5/M6 interchange).</p> <ul style="list-style-type: none"> • The Western Orbital route is inappropriate. 	<ul style="list-style-type: none"> • Noted. The JCS does not support the Western orbital.
<p>CSP4 – Phasing and Delivery of Housing on Employment Land</p>	<ul style="list-style-type: none"> • Support for the need to balance employment land and housing. • Phasing is necessary and a greater proportion of housing should be sought in the phasing period 2007 to 2016. • The proposed approach to phasing needs to be more detailed and a more targeted approach taken to individual corridors, enabling a more pro-active approach. 	<ul style="list-style-type: none"> • Noted. Publication Policy DEL2 provides a framework to manage the balance between employment land and housing. • Publication Policy HOU1 sets out the proposed phasing of housing development over the JCS period. This is based on SHLAAs, Employment Land Studies and estimates of the likely scale of housing renewal. Although these are minimum targets, given poor economic conditions and the economic uncertainty at the beginning of the Plan period and the lead in time to bring forward many of the housing sites in the growth network, housing capacity has been

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	<ul style="list-style-type: none"> • Further detail is required regarding a trigger point for the review of the Core Strategy. • Area Action Plans and Supplementary Planning Documents will need to be brought forward to achieve greater flexibility and higher housing targets that may emerge from the RSS Phase 2 revision. • The phasing policy should not prevent redundant brownfield sites coming forward for development once available. • A detailed planning obligations policy is not appropriate at this 	<p>concentrated in the second phase. The Black Country Housing trajectory is set out in Appendix 4 of the Publication document.</p> <ul style="list-style-type: none"> • The JCS Delivery and Implementation Plan 2009 will set trigger points for the Core Strategy.. • Section 2e of the Publication Core Strategy sets out the role of Plan making in the delivery of the Strategy. • Publication Policy DEL2 provides an appropriate mechanism to manage the development of appropriate sites for housing while retaining an adequate supply of employment land. • Noted. Publication Policy DEL1 promotes a flexible approach

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	<p>stage – this would fail to reflect the different planning obligations requirements in different parts of the Black Country.</p> <ul style="list-style-type: none"> • The realisation of environmental improvements necessary to provide the backdrop to residential development requires a coordinated approach to phasing and delivery. • Support for the release of land for housing provided this does not allow employment land that will never be reused to be held back. • Phasing should support the brownfield first principle. 	<p>to securing infrastructure to serve the development.</p> <ul style="list-style-type: none"> • Phase 1 of the EIG provides the strategic context for policies on Environmental Infrastructure as set out in Publication Policies ENV1-8. Phase 2 of the EIG has commenced and this will develop these proposals in more detail to inform Area Action Plans and Site Allocations Documents. • Publication Policy DEL2 provides an appropriate mechanism to manage the development of appropriate sites for housing while retaining an adequate supply of employment land. • The Strategy for the Black Country is a brownfield land strategy, with a target of 95% for all housing completions.

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	<ul style="list-style-type: none"> • The strategy must enable the particular merits of each site to be considered at the local level. There are a wider range of other planning considerations not referred to in CPA4 (for instance proximity to facilities, public transport routes etc). • Additional criteria should be applied including an assessment of the compatibility of employment sites with surrounding uses. • There should be a reference in the text to the local authorities willing to use compulsory purchase powers if required. Otherwise, given the mix of uses and ownerships in the corridors there is potential for many hold-ups. • The location of development is 	<ul style="list-style-type: none"> • Noted. This is addressed in other policies, for example accessibility to facilities is addressed in Policy HOU2. • Noted. Publication Policy DEL2 recognises issues of compatibility of adjacent uses in determining whether employment activity should be retained on individual sites. • The challenges of bringing sites forward for development are recognised and the Publication Core Strategy commits local authorities to encourage the relocation of those activities that detract from the regeneration of the area. further detail will be set out in Area Action Plans and other development Plan Documents. • It is recognised that the Core

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	<p>based on insufficient information. A five year review is suggested to ensure that should market economies change dramatically, employment land can be retained or released as necessary.</p> <ul style="list-style-type: none"> • The Preferred Option does not contain a housing trajectory and is not based on the principle of 'plan, monitor and manage'. • The policy will not provide for a sufficient level of employment land and the delivery policy should make additional provision. • The Core Strategy should recognise while it is desirable to avoid an over-concentration of employment land release in certain corridors, and 	<p>Strategy is a long term plan with the potential for varied market conditions. However, the employment land requirements are based on long term projections using a robust approach. Publication Policy EMP1 recognises this issue and proposes a review of the key assumptions in 2015.</p> <ul style="list-style-type: none"> • Noted. The Publication Core Strategy contains a housing trajectory. • Technical work undertaken after the Preferred Options consultation in the GVA Grimley 'Assessment of Employment Sites' Report shows that the JCS is providing a sufficient stock of retained employment land to meet forecast needs. • The phasing of employment land release set out in Policy DEL2 provides a sufficient supply of land for housing while safeguarding an

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	<p>hold back sites that are 'fit for purpose' for employment use, this may compromise the housing growth agenda.</p> <ul style="list-style-type: none"> • A greater proportion of housing should be sought in the phasing period 2007 to 2016. • Preference should be given to the release of poor quality and low demand employment sites that are 	<p>appropriate stock of retained employment land.</p> <ul style="list-style-type: none"> • Publication Policy HOU1 sets out the proposed phasing of housing development over the JCS period. This is based on SHLAAs, Employment Land Studies and estimates of the likely scale of housing renewal. Although these are minimum targets, given poor economic conditions and the economic uncertainty at the beginning of the Plan period and the lead in time to bring forward many of the housing sites in the growth network, housing capacity has been concentrated in the second phase. The Black Country Housing trajectory is set out in Appendix 4 of the Publication document. • Agree that the approach set out in the Preferred Options Report requires further detail. Publication

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	<p>currently available.</p> <ul style="list-style-type: none"> • Land at Holbeache Lane, Dudley should be allocated for development. • Support for the broad locations of housing development in each regeneration corridor and strategic centre. • Lead in times for recycling and 	<p>Policy DEL2 provides a more refined approach to managing the redevelopment of employment land to housing to bring forward vacant, surplus sites first.</p> <ul style="list-style-type: none"> • The site is designated within the Green Belt. The Black Country Core Strategy does not propose to alter the green belt boundary or include any urban extensions as part of the development strategy. There are sufficient sites identified within the urban areas of the Black Country to accommodate the proposed housing requirements within the Core Strategy without the need to consider any urban extensions or incursions into the Green Belt. • Noted • Agree that the approach set out in

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	<p>servicing brownfield sites can be lengthy thus criteria (3) and (4) of Policy 4 should be deleted.</p> <ul style="list-style-type: none"> • The existing Sandwell general Hospital will be surplus to requirements in 2015 and residential development on this site will be appropriate. CPA4 should enable such sites to come forward for redevelopment. • There is no robust evidence to support the reliance on windfall land development in the first ten years. • Phasing in line with infrastructure improvements needs to be strengthened. 	<p>the Preferred Options Report requires further detail. Publication Policy DEL2 provides a more refined approach to managing the redevelopment of employment land to housing.</p> <ul style="list-style-type: none"> • Should the Sandwell General site become surplus to requirements, it will be assessed as part of the SHLAA process. Alternatively, should a planning application be submitted, it will be determined on its merits. • The Core Strategy does not make any allowance for windfall development. All capacity has been identified through the SHLAA process. However, it is inevitable that some windfalls will emerge. • Publication Policy DEL1 and DEL2 promote a coordinated approach to infrastructure provision, a comprehensive approach and not prejudicing existing and

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	<ul style="list-style-type: none"> The Employment Land Review highlights an impending deficit, yet Policy 4 commits employment land to housing development. 	<p>neighbouring uses.</p> <ul style="list-style-type: none"> Technical work undertaken after the Preferred Options consultation in the GVA Grimley 'Assessment of Employment Sites' Report shows that the JCS is providing a sufficient stock of retained employment land to meet forecast needs.
<p>CSP5 – Provision of Infrastructure</p>	<ul style="list-style-type: none"> The Policy could cover extra-sub-regional outward facing transport links, including road and rail. The application of s106 and or CIL must allow a fair and equitable assessment of development viability, for example as contained in national policy on affordable housing. 	<ul style="list-style-type: none"> The Strategy recognises that routes do not stop at the boundary of the Black Country and national and regional proposals have been taken into account. Consultation has taken place with Highways Agency and Network Rail and their proposals are included in the Strategy. Agree that planning obligations should have regard to viability. This is reflected in Publication Policy DEL1.

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	<ul style="list-style-type: none"> • A new indicator should be included which measures the amount of land released from employment to housing within the Regeneration Corridors. • The most appropriate approach to planning obligations would be to use the CIL and where items fall outside of CIL contributions should be sought in line with Circular 05/05. • The figures set out in the JCS do not set out how employment land supply compares with that set out in the RSS Phase 2 review, in particular the five year target and long term supply. • More specific policies are needed to determine how developer contributions can be secured for sub-regional infrastructure needs, including metro and sport and leisure facilities. 	<ul style="list-style-type: none"> • Agree that the phasing of redevelopment of employment land to housing required a strong monitoring framework. This is provided as part of Publication Policy DEL2. • Publication Policy DEL1 refers to a range of approaches to securing planning obligations appropriate to the development concerned and the scale of impact. This includes CIL and s106 Agreements. • Agree that the Preferred Options does not provide a strong link with the RSS Phase 2 Review requirements. This is addressed in Publication Policies EMP1-4. • In some cases it may be appropriate for fund sub-regional infrastructure through the pooling of contributions. This is recognised as part of Publication Policy DEL1.

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	<ul style="list-style-type: none"> • The inland waterway network needs to be recognised as a form of infrastructure eligible for allocation of CIL revenue. British Waterways should be listed as a key infrastructure provider. • There should be no need for the pooling of resources or roof taxes – this is what CIL should be used for. • The approach does not take into account how demand management will be taken forward, especially while the TIF congestion charging is not on the agenda. • Suggested addition of text to clarify and strengthen the environmentally sound aims and deliverability. • Any indicators or targets should be 	<ul style="list-style-type: none"> • It is not necessary for the JCS to list all infrastructure that will be eligible for CIL funding. Infrastructure requirements will be established through local authority Development Plan Documents. • In some cases it may be appropriate for fund sub-regional infrastructure through the pooling of contributions. This is recognised as part of Publication Policy DEL1. • Demand management is addressed in Policy Tran 5. • Agree that the role of EIG needs to be a stronger than that set out in the Preferred Options Report. Publication document includes an overarching EIG Policy as one of the five Spatial Strategy Policies. • We will endeavour to ensure that

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	<p>in conformity with Local Transport Plan indicators and those set through Local Area Agreements.</p> <ul style="list-style-type: none"> • There should be a recognition in the Policy that developer contributions are prioritised so that where the full quota cannot be met then s106 provisions are targeted towards the most important areas. • The availability of mineral resources and of waste management facilities should be considered as essential elements of local development infrastructure. • The policy should recognise that 	<p>all indicators and targets are in conformity with all four borough's LAAs and the LTP where this is possible. However there may be occasions where this is not possible.</p> <ul style="list-style-type: none"> • Publication Policy DEL1 refers to a range of approaches to securing planning obligations appropriate to the development concerned and the scale of impact. • Agree that mineral resources and waste management facilities are key infrastructure and strategic facilities are shown on the key diagrams. However, it is not necessary for the JCS to list all infrastructure that will be eligible for CIL funding. Infrastructure requirements will be established through local authority Development Plan Documents. • TRAN 1 recognises that the

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	<p>improvements in public transport could facilitate new and intensified development by freeing up existing highway capacity.</p> <ul style="list-style-type: none"> • Green infrastructure requirements should be identified at an early stage and implemented alongside new development. • There must be long term strategies for development at motorway junctions specifically M5 jcn 1, jcn2 and M6 jcn 9 and jcn 11. • The document needs to comment on 'willingness' of public sector contribution to the provision of infrastructure. 	<p>development of networks is focused on a step change in public transport provision improving efficiency.</p> <ul style="list-style-type: none"> • Agree that Green Infrastructure is key infrastructure and strategic proposals are shown on the key diagrams. However, it is not necessary for the JCS to list all infrastructure that will be eligible for CIL funding. Infrastructure requirements will be established through local authority Development Plan Documents. • TRAN 1 outlines the key transport proposals and these include improvements to the motorway junctions M5 1 and 2 and M6 9 and 10. Further detailed work is also being undertaken to assess these. • The JCS will be supported by a Delivery Plan. This will set out the responsibility for provision of infrastructure including the public

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	<ul style="list-style-type: none"> • Locally grown food will contribute to reducing the flood risk within Sandwell by allowing water run-off through soil in strategic areas across the Borough. • It is important that policies ensure sufficient sporting infrastructure is provided to meet community needs. • The Core Strategy should set a context for securing planning obligations which can then be developed through SPDs in each of the local authorities. 	<p>sector.</p> <ul style="list-style-type: none"> • Noted. • Agree that sport infrastructure is key infrastructure and strategic proposals are shown on the key diagrams. However, it is not necessary for the JCS to list all infrastructure that will be eligible for CIL funding. Infrastructure requirements will be established through local authority Development Plan Documents. • Publication Policy DEL1 refers to a range of approaches to securing planning obligations appropriate to the development concerned and the scale of impact. Detailed approaches will be set out in Development Plan Documents and SPDs.

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	<ul style="list-style-type: none"> • Health facilities will need to be incorporated within Brownhills. • Pooling of developer contributions may be useful, but they should be directly related to development. • Infrastructure in Streetly is insufficient for current inhabitants. • The policy needs to emphasise the scale of infrastructure changes required to achieve the transformation of Brierley Hill to become a PPS6 compliant town centre. • The term 'community facilities' needs to be defined more clearly by use of either a glossary or the DCMS definition of culture. 	<ul style="list-style-type: none"> • Noted. Detailed infrastructure requirements will be established in relevant Area Action Plans and Development Plan Documents. • In some cases it may be appropriate for fund sub-regional infrastructure through the pooling of contributions. This is recognised as part of Publication Policy DEL1. • Noted. Detailed infrastructure requirements will be established in relevant Area Action Plans and Development Plan Documents. • Noted. Detailed infrastructure requirements will be established in relevant Area Action Plans and Development Plan Documents. • Key community facilities are addressed by Policies HOU2 and HOU5. Detailed community facilities needs infrastructure will be

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	<ul style="list-style-type: none"> • New housing development will require new primary care facilities. • The Core Strategy should contain indicators related to health and well-being. • The needs of the Police should be taken into account in development plans. • The method of delivery of infrastructure should be carefully matched to each type and level of infrastructure. 	<p>established in relevant Area Action Plans and Development Plan Documents.</p> <ul style="list-style-type: none"> • Primary Care facilities provision is addressed by Policies HOU2 and HOU5. • The SA will set indicators and targets related to health and well-being. • It is not necessary for the JCS to list all infrastructure that will be eligible for CIL funding. Infrastructure requirements will be established through local authority Development Plan Documents. • Publication Policy DEL1 and DEL2 promote a coordinated approach to infrastructure provision, a comprehensive approach and not prejudicing existing and neighbouring uses.

BLACK COUNTRY CORE STRATEGY PREFERRED OPTIONS (MARCH 2008)

SUMMARY OF COMMENTS AND HOW THEY HAVE BEEN ADDRESSED

HOUSING (CPA6 – CPA10)

Subject	Summary of Comments	How Addressed
CPA6: Delivering Sustainable Housing Growth	<ol style="list-style-type: none">1. Objections to the housing capacity if it is not based on a SHLAA 2. There are a number of objections to the lack of capacity on green field sites which are counter-acted by a great deal of support for 95% of development on previously developed land 3. There is support for the exclusion of windfalls from the overall capacity	<p>The potential housing capacity was originally identified using information from an employment land study. The 4 Black Country local authorities will have draft SHLAAs in place on Publication of the Core Strategy, with completed documents in place by April 2010.</p> <p>There is currently sufficient capacity identified on previously developed land. There is no need to identify green field sites. There is a great deal of support for development on previously developed land.</p> <p>All of the housing capacity has been identified through the SHLAAs and therefore, are not windfalls. It is inevitable that some windfalls will come forward. However, these will not be included within the capacity.</p>

	<p>4. There is a need for flexibility to take into account any further housing requirements emerging through RSS Phase 2</p> <p>5. Support for the reuse of existing buildings</p> <p>6. There are suggestions that the housing targets are too low and that Greenfield housing sites should be released to increase the capacity</p> <p>7. The 2006 household projections need to be taken into account</p>	<p>The Study commissioned by the GOWM to identify additional land for housing in the West Midlands region did not recommend additional housing requirements for the Black Country. Therefore, the Black Country local authorities can be reasonably confident that any changes in requirement can be accommodated.</p> <p>This has been recognised in the reduction in the numbers of demolitions anticipated.</p> <p>The Study commissioned by the GOWM to identify additional land for housing in the West Midlands region did not recommend additional housing requirements for the Black Country. There is currently sufficient capacity identified on previously developed land. There is no need to identify green field sites.</p> <p>The 2006 household projections have been taken into account as part of the RSS Phase 2 Revision.</p>
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<p>CPA7: Density of New Residential Development</p>	<ol style="list-style-type: none"> 1. Generally a lot of support for this policy area 2. There needs to be more emphasis on good design – high density developments need to be well designed 3. There needs to be a more flexible approach to density, dependent on local circumstances 4. High quality homes, not high density 5. High density should be 40+dph 6. High quality family homes at densities of 30-35dph are needed as there is already a supply of high density developments 	<p>Noted</p> <p>The Core Strategy contains a strategic policy on Place Making and a specific design policy</p> <p>Policy HOU2: Housing Density, Type and Accessibility, contains an approach to density which takes into account accessibility to various local services.</p> <p>Policy HOU2: Housing Density, Type and Accessibility, sets out the need for a range of types and sizes of accommodation to meet identified needs.</p> <p>Policy HOU2: Housing Density, Type and Accessibility allows for densities from 35dph to 60+ dph dependent upon local circumstances and accessibility to local services.</p> <p>Policy HOU2: Housing Density, Type and Accessibility allows for densities from 35dph to 60+ dph dependent upon local circumstances and accessibility to local services.</p> <p>Policy HOU2: Housing Density, Type and</p>
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	7. Support for high density developments close to local facilities and public transport	Accessibility allows for densities from 35dph to 60+ dph dependent upon local circumstances and accessibility to local services. The highest density developments (60dph+) are only appropriate within strategic or town centres.
CPA8: Tackle Areas of Low Demand	<p>1. General support for this policy area</p> <p>2. Support a focus on the refurbishment of existing stock</p>	A combination of renovation, improvement, refurbishment and in some cases redevelopment of housing stock will take place, with regard to the most sustainable approach. Demolition estimates have also reduced markedly in recent years.
CPA9: Provide a Well Balanced Range and Choice of Housing	<p>1. There is general support for providing a range and choice of housing</p> <p>2. Some objection to the imposition of particular dwelling types and tenures</p>	Policy HOU2: Housing Density, Type and Accessibility, sets out the need for a range of types and sizes of accommodation to meet identified needs. This issue has been addressed within the Core Strategy because household projections indicate that 60% of new Black

	<p>3. There is support for high quality housing to meet the needs of the A/B population</p> <p>4. There is general support for less construction of apartments. However, this is counter-acted by support for smaller houses to meet the needs of smaller households and free up larger houses</p> <p>5. Support for housing to meet the needs of all groups particularly the elderly and the disabled</p> <p>6. Support for addressing the needs of gypsies and travellers</p>	<p>Country households will be 1 or 2 person. It is important that new housing reflects the needs of these new households.</p> <p>In addition, the Black Country suffers from a lack of housing choice which limits its ability to attract households in social groups A and B. Therefore, the Core strategy aims to diversify housing choice.</p> <p>Policy HOU2: Housing Density, Type and Accessibility, sets out the need for a range of types and sizes of accommodation to meet identified needs. This issue has been addressed within the Core Strategy because household projections indicate that 60% of new Black Country households will be 1 or 2 person.</p>
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<p>CPA10: Deliver Affordable Housing</p>	<p>1. General support for the provision of affordable housing.</p> <p>2. Some objections to a single affordable housing targets across the Black Country but this is countered by support for a single target with more localised targets at local authority level.</p> <p>3. Economic viability needs to be taken into account with affordable housing being provided on a site by site basis.</p>	<p>The Black Country has an affordable housing target of 11,000 affordable dwellings between 2006 and 2026. The RSS suggests a minimum target of 29% of gross completions to be affordable. However, this is considered to be unachievable due to viability issues. A target of 25% affordable housing will initially be sought on all eligible sites with a view to achieving 11,000 affordable dwellings between 2006 and 2026</p> <p>Economic viability is recognised as a key issue affecting the deliverability of affordable housing in the Black Country. The policy states that where 25% affordable housing is not proven to be viable, the maximum proportion of affordable housing will be sought where the viability of the development will not be undermined.</p>
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**BLACK COUNTRY CORE STRATEGY PREFERRED OPTIONS (MARCH 2008)
SUMMARY OF COMMENTS AND HOW THEY HAVE BEEN ADDRESSED
ENVIRONMENT (CPA14 – CPA18)**

Subject	Summary of Comments	How Addressed
<p>CPA14: Ensuring High Quality Design in all New Development</p>	<ol style="list-style-type: none"> 1. General support for high quality design 2. There is a need to take into account other requirements, e.g. the Code for Sustainable Homes, waste management, green space/infrastructure. 3. Housing should be designed to meet people's needs, particularly the disabled. 4. Planning for safety issues need to be addressed 	<p>Support noted and welcomed.</p> <p>The Core Strategy requires development proposals to implement the principles of Government and local design guidance, including the Building for Life Criteria, Code for Sustainable Homes Level 3, BREEAM Very Good standard and Secure By Design Principles. Environmental Infrastructure is also a key strategic policy for the Core Strategy.</p> <p>Policies of the Core Strategy aim to ensure that the needs of local people are addressed. The policies will provide the hook for further policies to be provided within local development documents.</p> <p>The Core Strategy contains policies that will ensure that new development proposals consider crime prevention measures and Secured By Design Principles.</p>

<p>CPA15: Protecting and Enhancing Local Character and Distinctiveness</p>	<p>1. Several comments offer general support for the broad aims / intentions of this policy area.</p> <p>2. A number of comments make a link between the historic environment and the importance of the canal network in the Black Country. Reference is made to the potential for a World Heritage Status bid and also to the design of canalside proposals positively addressing the water.</p> <p>3. Some concerns were raised, although fewer than comments in support of the policy area, that protection of the historic environment should not prevent or jeopardise investment in new development. It was also said that local character and distinctiveness should not be protected by a blanket policy, rather</p>	<p>The support is welcomed and as a result this policy area has been progressed through Policy ENV2: Historic Character and Local Distinctiveness and other related policies such as ENV3: Design Quality and ENV4: Canals within the Joint Core Strategy submission document.</p> <p>Due to the importance of canals to the Black Country's heritage and historic environment, the JCS 'canals' policy (ENV4) has a strong connection with the overall 'historic character and local distinctiveness' policy (ENV2). Key elements of the canals policy seek to enhance and protect the special historic interest in the canal network without compromising the maintenance of navigable waterways or multifunctional use of the canal network.</p> <p>These are valid points; the policy approach to protecting and enhancing the historic environment is set within the overall strategy for development in the Black Country to 2026. Policy ENV2 makes specific reference to preserving and enhancing elements of the historic environment which have <i>special</i> quality.</p>
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	<p>only where this character or distinctiveness is valued.</p> <p>4. Place-making and a 'sense of place' were also raised as important considerations for the Core Strategy to address.</p>	<p>An overall strategic policy (CSP4) has been created that identifies the importance for proposals to contribute to a wider place-making agenda within the Black Country. This can include, amongst other things: the design of distinct buildings, streets and public spaces; provision of safe urban environments for local communities; and the provision of public art which may become synonymous with a particular area</p>
<p>CPA16: Delivering Environmental Transformation</p>	<p>1. Greater emphasis to be given to biodiversity, i.e. the protection and enhancement of biodiversity features, was raised by a number of respondents. This included suggestions to conserve existing designated sites and seek to establish</p>	<p>These issues have been comprehensively addressed for the Core Strategy through the recognition of biodiversity and geodiversity importance in CSP3 'Environmental Infrastructure', the inclusion of a 'Nature' function as</p>

	<p>wildlife corridors.</p> <p>2. Some comments suggested a review of green belt and an assessment of lower grade greenfield land should be carried out to assess the potential for accommodating new development on such land.</p> <p>3. Measures to support the canal network</p>	<p>technical evidence within the Black Country Environmental Infrastructure Guidance (EIG), and the introduction of policy ENV1 'Nature Conservation'. Current designated nature sites, including wildlife corridors, will be carried forward from each local authority's UDP and proposals map, whilst the Local Sites Partnership will look to designate additional sites as appropriate.</p> <p>The 'Brownfield First' sustainability principle within the Core Strategy has a commitment to prioritising development on brownfield land over greenfield land. Policy HOU1 states that 95% of all new housing developments will be on brownfield land. Furthermore, previous consultation on the overall strategy showed broad support for this approach. The release of green belt land to accommodate additional development in the Black Country would be contrary to RSS policy and the overall strategy of achieving urban renaissance via a sustainable settlement pattern.</p> <p>The Core Strategy now contains a specific</p>
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	<p>were suggested, such as the reopening of certain branches of the canal network, the protection of historical elements of the canal network, and improving canal-side links between the urban cores of the Black Country and surrounding rural areas.</p> <p>4. One comment questioned why there were no references to the Water Framework Directive.</p> <p>5. Several comments raised concerns over an apparent 'shortage of green space' and the need to protect green spaces in town centres due to their potential to contribute to the improvement of health.</p>	<p>policy (ENV4) on the Black Country canal network, which recognises the value of canals to the sub-region for their multi-functional uses and benefits. These can include: the historical importance; the nature conservation value and use for wildlife corridors; the impact on tourism and benefits for leisure and recreation; and, the visual amenity of the network.</p> <p>The Water Framework Directive and its implications for water quality in the Black Country have been considered in the Outline Water Cycle Study which forms a key part of the evidence base for JCS Policy ENV5.</p> <p>The Core Strategy will seek to protect the overall value of the open space, sport and recreation network in the Black Country. Broad aims for open space protection will be applied through saved UDP policies for each local authority, while detailed local standards for open space will be derived from each authority's own PPG17 Assessments and implemented through future local development documents.</p>
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<p>CPA17: Delivering Sustainable and Energy Efficient Construction</p>	<p>1. The vast majority of comments on this policy area objected to the intention to seek Code for Sustainable Homes level 4 for all new housing from the date of adoption of the Core Strategy. Arguments were based on the fact that development viability could be compromised as a result of such a requirement and that any targets should be aligned with national guidance for the Code for Sustainable Homes and its implementation through Building Regulations.</p> <p>2. Some comments proposed specific measures to be sought to improve energy conservation and efficiency. These included grey water recycling, solar panels and external insulation.</p> <p>3. Reference was also made to the policy supporting the increased use of recycled materials during development.</p>	<p>Initiatives to improve sustainable design and produce more energy efficient buildings have been addressed through the policy on design quality (ENV3). The JCS has now altered the requirements of this policy to align with the timetable for implementation of schemes such as the Code for Sustainable Homes by following regional and national guidance. This will allow for consistency and certainty for developers, whilst still demonstrating a commitment to achieving high quality and sustainable design across the entire Black Country.</p> <p>The Core Strategy is a strategic planning document covering the whole of the Black Country. Specific proposals regarding the sustainable design of development will be delivered by the individual local authorities through the production of future local development documents and through the development management / planning application process.</p> <p>Waste Policy WM5 'resource management and new development' in the JCS is a cross-cutting policy linked to</p>
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		<p>Preferred Options CPA17. This policy includes a requirement for major development to provide information with planning applications concerning the sourcing of building materials, including the use of secondary, recycled, renewable and locally sourced materials.</p>
<p>CPA18: Renewable Energy</p>	<p>1. Flexibility was called for in the policy to allow sites with financial constraints and marginal viability to contribute reduced amounts of renewable energy.</p> <p>2. Some comments were received regarding the use of the canal network for heating and cooling of buildings.</p>	<p>The Core Strategy renewable energy policy (ENV7) incorporates flexibility for a reduced renewable energy target or acceptance of a commuted sum to be made where development would otherwise be unviable. However this will only be accepted where an independent assessment of the financial viability of a site is submitted and where the proposal would accord with the remainder of the strategy.</p> <p>The Core Strategy will seek to promote beneficial and multifunctional use of the canal network through Policy ENV4. This could include investigating the feasibility of using canal water for heating and cooling systems although it should be remembered that any proposals which will, in effect, be ancillary to the main functions of the present day canal network</p>

		will need to ensure that these main functions are not compromised.
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BLACK COUNTRY CORE STRATEGY PREFERRED OPTIONS (MARCH 2008)

SUMMARY OF COMMENTS AND HOW THEY HAVE BEEN ADDRESSED

MINERALS (CPA19 – CPA24)

Subject	Summary of Comments	How Addressed
Minerals: General	<ul style="list-style-type: none"> • There should be a strategic objective for minerals. • Minerals policy should reflect hierarchical approach to minerals in MPS1. • Minerals policy should reflect strategic objective 2.4 of the West Midlands Regional Economic Strategy. • Core Strategy should address the “legacy” of former mineral working in terms of ground stability and surface hazards. • Question the need for so many minerals policies. • Minerals policy should provide opportunities to promote geodiversity/ 	<ul style="list-style-type: none"> • Spatial Objective 10 for minerals has been included in the Core Strategy • Hierarchical approach has been reflected throughout the minerals policies MIN1 – MIN5. • Core Strategy policies MIN1 – MIN5 support the West Midlands Regional Economic Strategy objectives. • Land remediation issues are addressed in the delivery section of the Core Strategy. Specific requirements relating to mineral safeguarding and mineral working are included within Policies MIN1 and MIN5. • The number of minerals policies has been rationalised and kept to a minimum. • Policies MIN1 and MIN5 encourage creation

	<p>create new geological exposures.</p> <ul style="list-style-type: none"> • The availability of mineral resources for construction and of should be considered as essential infrastructure. • There should be better cross-referencing to other policies. 	<p>of new geological exposures where they are most likely to arise, i.e. through “prior extraction” / land remediation schemes and through restoration of former mineral workings.</p> <ul style="list-style-type: none"> • Requirements for mineral resources for construction are set at a national and regional level through national policy guidance and the RSS. • Cross-referencing of minerals policies to other minerals has been improved.
<p>CPA19: Safeguarding the Black Country’s Mineral Resources</p>	<ul style="list-style-type: none"> • Core Strategy should identify key mineral resources to be safeguarded and define mineral safeguarding areas (MSAs) around them. • Mineral safeguarding policy should focus on safeguarding of finite mineral resources; need for policy thresholds questioned. • There should be a presumption against/ justification for non-mineral development within mineral safeguarding areas (MSAs) which would sterilise mineral resources. 	<ul style="list-style-type: none"> • Policy MIN1 identifies the mineral resources which are or may become of economic importance in the Black Country. • A single mineral safeguarding area (MSA) has been defined on the Minerals Key Diagram, covering the full extent of the mineral resources present in the Black Country – this reflects the approach adopted in “sound” core strategies for minerals. • Separate illustrative maps have been included in Appendix 7 to show the extent of different mineral commodities.

	<ul style="list-style-type: none"> • When considering proposals for non-mineral development within a mineral safeguarding area (MSA), key consideration should be feasibility of prior extraction/ alternative sites, not economic viability. • Core Strategy should safeguard existing and potential rail heads and wharves used to transport minerals. 	<ul style="list-style-type: none"> • Policy MIN1 includes guidance on non-mineral development within the MSA. To address potential conflicts with the spatial strategy the requirement to demonstrate that minerals have not needlessly been sterilised only applies to very large developments within the urban areas. • Policy MIN1 seeks to safeguard existing and potential mineral related infrastructure including rail-linked facilities and locations with potential for rail freight, although it has not been possible to identify any locations with potential to transport minerals by inland waterway. Locations to be safeguarded are shown on the Minerals Key Diagram and listed in Appendix 7. Freight policy TRAN3 also aims to safeguard locations with potential for rail-related uses.
<p>CPA20: Maintaining a Continued Supply of Aggregate Minerals in the Black Country</p>	<ul style="list-style-type: none"> • There should be greater focus on encouraging the use of alternatives to primary aggregates such as secondary and recycled materials. • The Black Country should be self-sufficient in minerals/ should make an appropriate contribution towards the sub-regional sand and gravel 	<ul style="list-style-type: none"> • Policy MIN2 highlights the contribution that alternatives are likely to make, towards aggregate supply in the Black Country. Use and production of alternatives is encouraged through Policy WM5 which sets out requirements for management of waste and resources in new developments. • Policy WM2 sets realistic targets for primary

	<p>apportionment taking into account the ability of neighbouring authorities to provide.</p> <ul style="list-style-type: none"> • Core Strategy should make provision sufficient to maintain a minimum 7-year landbank of sand and gravel in line with MPS1. • There is insufficient evidence that quarry extensions will provide the resources needed to maintain landbanks/ meet sub-regional requirements. • There should be greater certainty about where sand and gravel extraction can take place - site allocations should be considered as well as Area of Search, including land adjacent to Aldridge Quarry. • Concerns about cumulative impact of quarrying in the Aldridge/ Stonnall area (concerns expressed about impacts on the Green Belt, water resources, the local highway network and areas of importance for nature conservation). • There should be greater certainty 	<p>sand and gravel production in the Black Country which would enable production to continue in line with current rates. Production targets are modest but reflect the best evidence available on where viable resources are to be found, and the contribution that current/ future proposals are likely to make towards annual production.</p> <ul style="list-style-type: none"> • There is no sand and gravel apportionment for the Black Country – the area currently contributes towards the West Midlands County apportionment. The sub-regional sand and gravel apportionments are under review and this process is expected to be complete by March 2010. The evidence underpinning the Core Strategy aggregates policy and targets will inform this review, as will the evidence provided by other mineral planning authorities on the provision they are likely to be able to make. • To provide greater certainty about delivery of the targets, two Areas of Search for sand and gravel (MA1: Birch Lane and MA2: Branton Hill Lane) have been defined in the Aldridge area of Walsall. These include areas believe to contain viable mineral resources, where there is interest in mineral working.
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	<p>concerning where borrow pits might be located.</p>	<ul style="list-style-type: none"> • The identification of the Areas of Search has in part been informed by a desire to contain/ minimise the potential harmful effects of mineral working on the Black Country environment. Policies MIN2 and MIN5 highlight key issues which proposals within the Areas of Search or elsewhere should address to minimise the potential harmful effects of mineral working on the local environment, water resources and the highway network, and ensure that in the long-term, restoration of sites will make a positive contribution towards the Black Country’s environmental infrastructure. • Policy MIN2 clarifies that “borrow pits” should be linked to specific engineering or building projects, and should be located as close as possible to the project. They are therefore not restricted to the Areas of Search.
<p>CPA21: Supply of Clay to Brickworks</p>	<ul style="list-style-type: none"> • Clarification sought on which brickworks are regarded as “local”/ to be supplied from sources of clay within the Black Country. • Support for maintaining a 25-year supply to brickworks, but clarification sought on 	<ul style="list-style-type: none"> • Policy MIN3 clarifies which brickworks are to be supplied with Etruria Marl from sources within the Black Country. • Short- to medium-term shortfalls in supply of Etruria Marl have been addressed by identifying three Areas of Search (MA3: Oak

	<p>how shortfalls in supplies will be addressed.</p> <ul style="list-style-type: none"> • Core Strategy should take into account need for fireclays/ blending/ imported materials. • Concerns about impact of mineral extraction on the Green Belt in the Stubbers Green and Kingswinford/ Pensnett areas and on areas of importance for nature conservation. 	<p>Farm, MA4: Ketley and MA5: Stubbers Green) containing viable resources which may be exploited. These resources are likely to be sufficient to maintain supplies up to the end of the plan period, although a 25-year supply cannot be identified in every case.</p> <ul style="list-style-type: none"> • The potential need for fireclays is addressed in Policies MIN3 (primarily through stockpiling) and MIN4 which covers opencast coal and fireclay working. No production targets can be set for fireclay as there is no certainty that it will be exploited or that local resources are of sufficient quality for brick manufacture. • Policy MIN3 addresses the need for imports and stockpiling of clays, and the potential contribution that imports might make are taken into account in the supply calculations. However, there is no guarantee that imports will be available, so supplies will kept under review. • The identification of the Areas of Search has in part been informed by a desire to contain/ minimise the potential harmful effects of mineral working on the Black Country environment. Policies MIN2 and MIN5
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		<p>highlight key issues which proposals within the Areas of Search or elsewhere should address to minimise the potential harmful effects of mineral working and ensure that in the long-term, restoration of sites will make a positive contribution towards the Black Country's environmental infrastructure.</p>
<p>CPA 22: Energy Minerals</p>	<ul style="list-style-type: none"> • There is support for the inclusion of a policy on coal from the Coal Authority and AWM but GO-WM and Regional Conformity Panel have queried the need for it and it is suggested it could be covered in the policy on mineral safeguarding. • Yorks Bridge proposal put forward as a site allocation by Wyrley Estate, but not supported by other stakeholders (in particular Cannock Chase DC). Concerns are expressed by other stakeholders that its status is unclear. • Concerns about impact of opencast coal working at Brownhills Common and Yorks Bridge – main concerns are cross-boundary issues and impact on designated sites (including SINC and SAC). 	<ul style="list-style-type: none"> • The mineral safeguarding area (MSA) includes coal resources and they are shown on Map MC3 in Appendix 7. Policy MIN4 sets out requirements for exploitation of other minerals, including coal and fireclay. It is considered that such a policy is needed as the local issues relating to exploitation of these minerals are not adequately addressed in existing national or regional guidance or in Policy MIN1. • The existing “dormant” permission for opencast coal working at Brownhills Common could be activated at any time on the submission of a schedule of “modern” conditions in accordance with the Environment Act 1995 – Policy MIN4 sets out requirements that such conditions, and detailed working/ restoration proposals should address.

	<ul style="list-style-type: none"> • Policy should address potential for exploitation of coalbed methane and other emerging technologies. 	<ul style="list-style-type: none"> • Policy MIN4 also sets out requirements for working at Yorks Bridge, i.e. that this may be considered subject to revocation of the existing “dormant” permission at Brownhills Common. • The requirements in Policy MIN4 and MIN5 seek to minimise the potential harm that opencast coal and fireclay working would have on designated nature conservation areas during the extraction process, and to secure long-term improvements and a positive contribution to Black Country’s environmental infrastructure, through restoration programmes. • Policy MIN4 also sets out requirements for exploitation of coal bed methane in the event that a Petroleum Exploration Development Licence (PEDL) is issued for exploration within the Black Country. However, other technologies are unproven and there is no evidence that there is scope for them within the Black Country.
<p>CPA 23: Natural Building Stone</p>	<ul style="list-style-type: none"> • There is support for the inclusion of a policy on natural building stone from English Heritage, CPRE and BCGP and AWM acknowledge it is sustainable to 	<ul style="list-style-type: none"> • The mineral safeguarding area (MSA) includes natural building stone resources and they are shown on Maps MC1 – MC2 in Appendix 7. Policy MIN4 sets out

	<p>source material locally, but GO-WM and Regional Conformity Panel has queried the need for it.</p> <ul style="list-style-type: none"> • There are suggestions that the policy could be linked to/ addressed in the policies on mineral safeguarding and local character and distinctiveness. 	<p>requirements for exploitation of other minerals, including natural building stone. It is considered that such a policy is needed as the local issues relating to exploitation of these minerals are not fully addressed in existing national or regional guidance or in Policies ENV2 and MIN1.</p> <ul style="list-style-type: none"> • There has been engagement with conservation officers and a quarry operator on the potential need for natural building stone and this suggests there is a demand which could be met from exploitation of these minerals on a small-scale if this proves viable.
<p>CPA24: Prudent Use of Mineral Resources</p>	<ul style="list-style-type: none"> ▪ General support for promoting prudent use of mineral resources, although stakeholders have commented that this does not fit in with minerals policy and is primarily a waste and/ or sustainable construction issue. ▪ Core Strategy should aim to maximise use of alternatives to primary aggregates through recycling of construction, demolition and excavation wastes (CD&EW). ▪ Core Strategy should promote use of 	<ul style="list-style-type: none"> • Sustainable construction and sustainable resource management are now addressed in the general policies and in the waste policies, in particular in Policies CSP4 on place-shaping and WM5 on resource management in new developments. • Policy WM5 seeks to encourage on-site re-use, recovery and recycling of waste generated by the development process and to promote use of alternatives to primary aggregates and materials with low environmental impacts. Major development proposals are required to provide supporting

	<p>sustainable construction techniques.</p> <ul style="list-style-type: none"> ▪ Core Strategy should protect existing facilities for processing of construction, demolition and excavation wastes (CD&EW) into aggregate. ▪ Core Strategy should identify suitable locations for the development of new facilities for the production of waste from aggregates and for the storage, treatment and remediation of contaminated soils, in line with emerging RSS policy. 	<p>information on how resources will be managed.</p> <ul style="list-style-type: none"> • Policy WM2 seeks to protect the capacity of “strategic” waste management sites including sites which process waste into aggregate. Sites whose capacity will be protected are identified on the Waste Key Diagram and in Appendix 6. • Policy WM4 identifies locations suitable for the development of “urban quarries,” other facilities for processing construction, demolition and excavation wastes (CD&EW), and facilities for managing contaminated soils, although it has not been possible to identify specific sites. • Policy WM5 requires area regeneration projects to include a resource management strategy and a strategy for managing construction, demolition and excavation wastes (CD&EW) including any contaminated soils likely to arise.
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JCS Centres Policies – Policies 25, 26, 27, 28, 29, 30 and 38

Summary of representations to Preferred Options

Policy 25 – The importance of the Black Country Centres to the Regeneration Strategy

- Support for placing the four strategic centres at the heart of the spatial strategy, and that identifying the hierarchy of centres should ensure that centres of all sizes benefit from development.
- Each Strategic Centre needs to be sufficiently different so that investment is not diluted to the larger district centres
- Regeneration should be focussed on Wolverhampton, West Bromwich and Walsall over Brierley Hill

- The need for convenience floorspace should be recognised in the JCS, particularly for Dudley
- Caution against the assumption that all centre uses should be accommodated within the centres due to potential problems with infrastructure capacity.
- Objection that the floorspace proposals exceed those in RSS
- Identifying district and local centres is not appropriate in this Strategic Plan.

- The inclusion of Kingswinford, Lye and Sedgely in the same tier as Dudley, Stourbridge and Halesowen is not appropriate.
- Objection which questions the ability of Merry Hill and Brierley Hill to become a single centre
- The hierarchy should be flexible enough to reflect changes to centre status over the JCS period.

- Further clarity is needed on the role of Dudley as a town centre in the proposed hierarchy
- Objections that Dudley is in the same tier as other smaller centres

- Objection to the degree of detail in the JCS, specifically for Brownhills, this is too detailed for a Core Strategy

Policy 26 – Directing the RSS retail and office development requirements

- The objective may be better achieved through greater flexibility for targets for commercial development in larger non-strategic centres
- The market will require the provision of offices in out-of-centre locations.

- Support for a Policy approach which manages growth between the four strategic centres.
- Constraining development in one centre in the hope it will divert to another is a false hope.
- Proposals to transfer floorspace between the Strategic Centres is not supported by RSS. The requirements are centre specific.
- Wolverhampton should be the largest of the four Strategic Centres, and the focus for the majority of retail, leisure and cultural activity.
- Diverting investment away from a centre that has achieved its share of development is likely to divert investment away from the Black Country. In any event, this Policy will be difficult to achieve.
- There should be no phasing of development to 2021.

- The proposal to subject additional floorspace emerging through the RSS review to additional tests has no justification.
- A phasing approach is important to avoid exceeding take up creating dead pockets
- Proposals for development in excess of RSS levels should also have regard to impact on centres outside the Black Country.
- There is no evidence to support going beyond RSS retail and office requirements.
- The Policy does not set out the pre-conditions for further growth at Merry Hill.

Policy 27 – The smaller Town and large District Centres

- Employment sites outside the strategic centres can make an important contribution to the economy and the 5000sq m cap allows insufficient flexibility.
- Significant office and commercial development in Dudley town centre will drive economic growth. There should be no requirement to demonstrate a need for development in Dudley.
- The approach to additional convenience development in these centres should be consistent with that for comparison development, and Dudley has an identified need for a new convenience store.
- The Policies envisage higher levels of comparison retail growth than set out in RSS – this is opposed in the absence of any additional information.
- Development in smaller centres is encouraged bearing in mind local accessibility.
- Policy should also consider the impact of development within Black Country centres on centres in neighbouring districts.
- Dudley's special role should be recognised as a focus for tourism, culture and major residential.
- Setting limits for development in the smaller centres is too restrictive.
- The Policy should encourage the protection and enhancement of existing leisure and cultural facilities.

Policy 28 – Smaller District Centres and Local Centres

- The Support for the Policy on the grounds that it encourages local accessibility to shopping and employment.
- Not all centres within a particular category have the same character and so the appropriate scale of development should have regard to the specific characteristics of an individual centre.
- There needs to be distinction between district and local centres.
- The floorspace threshold figures should be guidelines with further evidence required by policy on why the scale of development proposed on an individual basis is appropriate to that centre.

Policy 29 – Local Shopping Needs

- General support for the enhancement of local shopping facilities.
- There should be recognition of the advantages of replacing existing shops with facilities better suited to meeting operator requirements,
- Concerns expressed at the scale of new development proposed given the number of vacant units, especially in Wolverhampton City Centre

Policy 30 – Edge of and Out-of-Centre development

- Proposals for edge of centre and out of centre development should be determined against a criteria based policy as set out in PPS6.
- The Policy is unclear on how proposals for edge of centre development will be determined.
- The Policy repeats government guidance contained in PPS6.
- Edge of centre and out of centre development may be necessary in some centres where existing boundaries are too tightly drawn to accommodate new development.

Policy 38 – Offices

- Objections that directing all major office development to the strategic centres is overly restrictive.
- A more pragmatic approach should be taken to offices outside centres, including the appropriate extension of existing businesses.
- Support for directing major office and service development to the main centres, such as Brierley Hill.
- Office locations should be prioritised in the centre, out of centre offices should only be allowed on clear public transport routes.
- Doubts expressed on the assumption that offices should be directed to main centres, this can lead to transport overload at peak periods.
- Questions over whether the Policy is essential, as there is already a strong national and regional policy.
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Centres Theme Group
July 2009

BLACK COUNTRY CORE STRATEGY PREFERRED OPTIONS (MARCH 2008)

SUMMARY OF COMMENTS AND HOW THEY HAVE BEEN ADDRESSED

TRANSPORT (CPA31 – CPA34)

Subject	Summary of Comments	How Addressed
<p>Transport: CPA 31 Providing transport requirements to support the strategy</p>	<ul style="list-style-type: none"> • Suggestions for 20mph limit. • Production of a Black Country cycle map • Transport policy must be flexible. Metro is one of many ways of accessing town centres. • Support the emphasis on public transport but with specific concerns (i.e. Walsall-Stourbridge passenger route) • High employment sites should also be accessible by sustainable transport and should have access 	<ul style="list-style-type: none"> • Suggestion is unrealistic - should refer to policy being carried forward. • A cycle map is a matter of detail. Consideration will be given to a Black Country Cycle Network. • Strategy will consider rapid transit, Area action plans and development proposals will provide3 detail. Consideration will be given to alluding to a wide range of measures. • Will be alluded to in final strategy • Will be included in final strategy

	<p>to a local and skilled workforce</p> <ul style="list-style-type: none"> • Show links beyond the Black Country. Policy should define heavy rail corridors to be protected • Have proposals for improvements been prioritised and are timetables realistic? There is nothing about managing demand. • Proposals regarding the rail network are not taken into account • Resource availability and developer contributions to infrastructure improvements must be considered • Differentiate freight transport from public transport • Consideration needs to be given to required cross-boundary aspects of Core Strategy • Support for re-opening of Walsall to 	<ul style="list-style-type: none"> • Rail corridors will be considered for safeguarding for potential future rail use. • Proposals have been prioritised and timetables have been evaluated. Consideration is being given to a specific transport policy on demand management. • Proposals will be taken into account in policies and included in the Key Diagram • Agreed. In general terms will be covered by a Travel Plan policy. • Freight will be considered separately to public transport • Cross-boundary issues are being taken into account especially with neighbouring West Midlands authorities • This will be considered and
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	<p>Stourbridge freight line to enable delivery by rail of aggregates to asphalt plant under construction at Hill Top, taking HGVs off the road</p> <ul style="list-style-type: none"> • Further development of this policy is required in four key areas – Spatial Policy Linkage, Regional and National Connectivity, Specificity of Outcomes and Phasing of Implementation • The Plan needs to provide far greater detail on the proposals intended to implement this policy • Park and Ride facilities need to be located to minimise adverse environmental effects and should support end-to-end public transport use. • Reducing car use by Cycling and Walking as travel between locations • Lack of clarity with regards to Park 	<p>possible inclusion in detailed list of proposed sites, subject to Network Rail.</p> <ul style="list-style-type: none"> • Detail will be considered and taken forward in final document • The Core Strategy represents a strategic framework. It is not appropriate at this stage to include this level of detail. • Will be taken into account in Park and Ride element of the strategy. • Cycling and Walking are being considered as a transport policy • Considered for inclusion and listing
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	<p>and Ride at Brinsford</p> <ul style="list-style-type: none"> • Low carbon transport system to complement the low carbon buildings of the future • Secure developer funding towards transport infrastructure improvements • Prioritising of improvements and delivery during funding timescales • Assessment of land availability in region for regeneration corridors • Various supporting comments, public transport improvements to Brierley Hill needed, refinement of policy needed, protecting heavy rail corridors, significant public transport improvements are critical, better transport for rural areas. 	<p>on Key Diagram as proposal.</p> <ul style="list-style-type: none"> • A balanced strategy will be produced • Being considered in policy • Will be considered in the Investment Strategy • Detailed analysis of capacity will be undertaken. • Comments are welcomed and have been noted.
<p>Transport: Establishing parking standards CPA 32</p>	<ul style="list-style-type: none"> • Detail needed in criteria for parking standards. • 	<ul style="list-style-type: none"> • Consideration of parking will be included in Strategy.

	<ul style="list-style-type: none"> • Parking charge policy should be a powerful tool controlling growth of centres • Policy should address Brierley Hill car parking regime management issue • Regeneration needs of vulnerable centres should be taken into account when setting maximum parking standards • Development allocations by use-class, not parking standards should be primary tool. Loading arrangements should be included. Transport systems to be put in place that enable good quality public transport, cycling and walking so that car restraint does not harm local centres. The word “prevent” to be used instead of “mitigate”. Land not required for car parking be used for buildings. • Parking to be used as a demand 	<ul style="list-style-type: none"> • This will be alluded to in the strategy • Level of detail not necessary for Core Strategy but this is required by the Regional Spatial Strategy • Will be considered in centres policy • Strategy will seek to encourage development at locations served by public transport. A balanced approach will be taken. The strategy does not provide for unrestrained growth. The comment on buildings will be considered in capacity studies. • This will be considered in final
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	<p>management tool</p> <ul style="list-style-type: none"> • Various supporting comments, public transport should be in place before parking restrictions 	<p>strategy</p> <ul style="list-style-type: none"> • Comments are welcomed and have been noted.
<p>Transport: Improving the highway network CPA 33</p>	<ul style="list-style-type: none"> • Specific improvements are not highlighted • Development close to motorway junctions must be appropriate so as not to worsen congestion on the strategic road network • Recognise the M54/M6 Toll road as a strategic route • A Pensnett Link Road should be identified as a strategic transport priority to alleviate transport problems and strengthen the Pensnett Estate as a key employment location • Greater detail needed on proposals to implement policy • Improving network important but these improvements add to 	<ul style="list-style-type: none"> • Will be addressed in development of strategy • Further detailed motorway junction studies will be undertaken • Importance is recognised • Has been considered in detail in previous studies and subsequent strategies have addressed the issue. • Part of the delivery plan • Schemes developed where necessary

	<p>maintenance pressures elsewhere</p> <ul style="list-style-type: none"> • A framework needed for improving management of road network to maximise efficiency for all road users • Mandatory speed limit of 20mph across sub region to improve street scene, reduce emissions and improve safety • Various supporting comments, radical improvements necessary, greater detail needed on implementation, rejection of a western bypass, removing bottlenecks, traffic management, number of changes to policy wording 	<ul style="list-style-type: none"> • Will be considered in strategy • Not a practical suggestion but aims have been taken into account in strategy • Comments are welcomed and have been noted.
<p>Transport: Supporting efficient movement of freight CPA 34</p>	<ul style="list-style-type: none"> • Acknowledge links beyond the Black Country • Inclusion of canal network as option for movement of goods • Insufficient importance providing for principle mechanism for moving 	<ul style="list-style-type: none"> • Links are in plan • Considered in policy • Addressed in strategy

	<p>freight in Black Country – by road. Need for better recognition of highway network serving existing and proposed employment sites</p> <ul style="list-style-type: none"> • Resource recovery park at Talbot Close, Green Lane identified as a preferred rail connected employment site within the development corridor • A Pensnett Link Road should be identified as a strategic transport priority to alleviate transport problems and strengthen the Pensnett Estate as a key employment location • Shared bus and HGV lanes • Provision for secure parking of HGVs • Construction of freight-only road links • Various supporting comments, waterside development to give 	<ul style="list-style-type: none"> • Considered in development of strategy along with other sites • Has been considered in detail in previous studies and subsequent strategies have addressed the issue. • Inappropriate detail for Core Strategy • Inappropriate detail for Core Strategy • Inappropriate detail for Core Strategy • Comments are welcomed and have been noted.
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	<p>precedence to designs that positively address the water and benefits to be drawn from it, policy needs to be more specific, need to safeguard Walsall to Lichfield rail corridor, use of canal system for freight, SMART objectives for movement to match spatial development strategy, consider ease of road access and time constraints on locational decision making, use of canals given same priority as rail freight, encouragement given to transfer road freight to rail freight, distribution should be more energy efficient and localised</p>	
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JCS Employment Policies – Policies 35, 36, 37, 39 and 40

Summary of representations and responses to Preferred Options

Policy 35 – providing for economic growth

General support for this Policy, especially the commitment to the transformation and diversification of the sub regional economy. Other comments addressed the following issues:

- The JCS should confirm whether there are any sites within the Black Country that can accommodate the need for a Regional Investment Site (RIS) to serve the Birmingham / South Black Country Regeneration Zone.

Response – the need for additional MIS/RIS/RLS sites in the region is being addressed through the Phase 2 review of the Regional Spatial Strategy. The Submitted Review document does not anticipate there to be a need for additional first tier sites within the sub region.

- A number of comments question the emphasis given to accommodating logistics sector needs and whether this is consistent with a strategy seeking a high technology, knowledge based economy.

Response – the JCS employment land requirements are based on extensive technical work which updates work subject to examination as part of the Phase 1 review of the RSS. This evidence base is considered to be robust, based on accepted and anticipated structural changes in the sub-regional economy.

- Concerns expressed over whether the JCS will provide a sufficient quantity of employment land to meet job needs, particularly high quality employment land.

Response – the JCS provides an adequate supply of employment land (para 4.24 Preferred Options report) to meet employment needs. This has been confirmed in the 2009 GVA Grimley Assessment of Employment Report and is set out in the JCS Publication document.

The needs of premium RIS, MIS and RLS quality sites are adequately addressed by i54, Wolverhampton Business Park and Hilton. However, the Black Country Local Authorities do accept that the needs of very large scale distribution activity cannot be accommodated within the Black Country due to a lack of suitable large, available sites. We support the findings of the Regional Logistics study and the proposals for a RLS to serve the needs of the Black Country being promoted through Policy PA9 of the Phase 2 Revision of the RSS.

Policy 36 – Providing for High Quality Employment Land

General support for the need to identify and safeguard high quality employment land in the Black Country, and the broad locations identified in the Preferred Options Report. Other comments addressed the following issues:

- The quantification of employment land needs is confusing and should be clarified.

Response – table 7 of the Preferred Options Report sets out employment land requirements for the Black Country to 2026. However, it is acknowledged that the relationship between Table 7 and the employment land requirement

associated with the RSS Phase 2 Revision, and the total employment land requirement set out in para 4.27 of the Preferred Options Report does need clarification. This is set out in Policies EMP1-4 of the JCS Publication document.

- The policy should recognise that high quality employment locations require good access by sustainable transport in addition to the car.

Response – Agreed.

- Site specific comments seeking the identification of land at Hilton Park (in South Staffordshire) and Holdbeache Lane (Dudley) for high quality employment land.

Response - the JCS provides an adequate supply of employment land (para 4.24 Preferred Options report) to meet employment needs and the 2009 GVA Grimley Assessment of Employment Sites Report. The needs of premium RIS, MIS and RLS quality sites are adequately addressed by i54, Wolverhampton Business Park and Hilton. However, the Black Country Local Authorities do accept that the needs of very large scale distribution activity cannot be accommodated within the Black Country due to a lack of suitable large, available sites. We support the findings of the Regional Logistics study and the proposals for a RLS to serve the needs of the Black Country being promoted through Policy PA9 of the Phase 2 Revision of the RSS.

- Development should provide facilities for waste and resource management infrastructure.

Response – it is considered that the requirement for new development to provide waste and resource management infrastructure is relevant to all development and so it is not necessary for a specific reference in this Policy.

Policy 37 – Local Employment Land

Strong support for the objectives of the Policy in recognising the value of local employment areas to the strategy. Other comments addressed the following issues:

- The uses identified in Policy 37 should not be solely directed to Local Employment Areas, but should be allowed in other areas.

Response – the nature of some of the uses identified in this Policy makes them unsuitable for residential areas or City / town centre locations. It is important that the quality of high quality / strategic employment locations is not compromised by insensitive activities associated with, for example, poor environmental quality.

- The Policy should be flexible enough to allow sites to come forward in local employment locations for other uses if they are not suited to employment uses.

Response – agreed that further clarity is required, specifically the link with Core Policy Area 4. However, the Policy also needs to provide certainty that those areas which meet the criteria that define local employment areas then they will be protected for those uses so as not to undermine their ability to attract investment. This approach is further refined in Publication Policy DEL2.

Policy 39 – Clustering

Comments suggesting that the Policy should be more flexible so as not to impose undue constraints on the location of such developments.

Response – it is accepted that the Policy area is largely aspirational in nature. Clustering is better set out at the local site specific level and addressed in Area Action Plans or Development Briefs. Delete this Policy Area from the emerging JCS.

Policy 40 – Access to the Labour Market

Overall support for the Policy with recognition of the role this approach can play in promoting social inclusion. Some concerns expressed in relation to the focus on centres and corridors affecting access to employment in peripheral locations.

Response – the JCS seeks to focus investment into the most sustainable locations in the Black Country – these being the Strategic Centres and Regeneration Corridors. The JCS also recognises the importance of employment locations outside the growth network, recognising that free-standing employment sites have an important and ongoing role.

Employment Theme Group
19 November 2009

BLACK COUNTRY CORE STRATEGY PREFERRED OPTIONS (MARCH 2008)

SUMMARY OF COMMENTS AND HOW THEY HAVE BEEN ADDRESSED

WASTE (CPA41 – CPA43)

Subject	Summary of Comments	How Addressed
Waste: General	<ul style="list-style-type: none"> • Waste management facilities should be considered as essential infrastructure. • Concerns about deliverability of protection of existing “strategic” sites/ deliverability of new site allocations. • Local people should be given preference in any job opportunities provided by new waste management facilities. • Concerns that the Core Strategy does not discourage fly-tipping (e.g. address commercial charging for waste, improve access to waste management for local communities and businesses). • Provision should be made for people not currently catered for by waste management facilities/ groups who are 	<ul style="list-style-type: none"> • Waste management facilities are considered as essential infrastructure. Future requirements are addressed in the Core Strategy waste policies WM1 – WM4. • Policy WM2 provides guidance to the authorities on how they should manage changes affecting existing or proposed “strategic” waste management sites. The “strategic” proposals in Policy WM3 are considered to be deliverable as there is evidence that they are either being progressed or have good potential. All site-specific proposals have also been subjected to an assessment, demonstrating that the location is suitable. • In some circumstances it may be possible to encourage recruitment of local staff through negotiation (see Policy EMP5) but the Core

	<p>excluded from recycling provision.</p> <ul style="list-style-type: none"> • Concerns about referring to waste management as a potentially “bad neighbour” use as this gives a negative impression. • The canal network should be considered as a means of transporting waste and material excavated from quarries. 	<p>Strategy cannot require waste operators, or any other employers, to give preference to local people.</p> <ul style="list-style-type: none"> • The Core Strategy requires new developments to take responsibility for managing the waste they generate (Policy WM5). Over time, the significant increases in waste management capacity proposed, and the provision of a broader range of facilities should improve access to sustainable waste management for local communities and businesses, as well as reducing costs and discouraging fly-tipping. • It is not the role of the Core Strategy to determine how recycling/ waste collection services should be provided to households in the Black Country. This is a matter for the waste disposal authorities to address through their Municipal Waste Management Strategies. • The Core Strategy adopts a positive approach towards waste management and does not refer to it as a “bad neighbour” use. Policy WM4 addresses the potentially harmful effects of certain waste operations/ uses.
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		<ul style="list-style-type: none"> • No canal-based infrastructure in the Black Country has been identified as having potential for transportation of minerals or waste.
<p>CPA41: Addressing the Black Country’s Waste and Resource Management Requirements</p>	<ul style="list-style-type: none"> • Waste should be addressed as a resource. • Core Strategy should adopt “zero waste” requirement in new developments. • No clear waste hierarchy is expressed. There should be a clear preference for waste avoidance and methods of management at the top end of the hierarchy (e.g. recycling, composting and production of biogas preferred to mass burn incineration) and for small facilities over large facilities. • It is unclear how the Black Country’s waste management requirements will be met. • The need for commercial facilities should be integrated into the strategy as well as Municipal waste requirements. • Municipal waste projections and diversion targets should reflect procurement 	<ul style="list-style-type: none"> • Waste is addressed as a resource in Spatial Objective 9 and in waste policies WM1 and WM5. • Zero waste growth is embedded within Spatial Objective 9 (reflecting the emerging RSS) and is addressed in Policy WM5. • The aspiration to move waste up the “waste hierarchy” is included within Spatial Objective 9 and is reflected throughout the waste policies WM1 – WM5. However, the strategy cannot be prescriptive about the methods used to divert waste away from landfill or the size of the facilities that will be developed, as this will be dictated by what is viable and deliverable. • The Black Country’s waste management requirements are set out in Policy WM1. They will be met through a combination of retaining existing capacity (Policy WM2), new strategic site proposals (Policy WM3), and other proposals brought forward in accordance with the guidance in Policy WM4.

	<p>requirements (e.g. longer time-span) and LATS targets.</p> <ul style="list-style-type: none"> • Core Strategy should address the waste management requirements of the proposed levels of growth/ include targets to maximise recycling and reuse of waste. • Management of contaminated soils is a waste issue and should be dealt with in the waste policies not in the minerals policies. • Cross-boundary movements should be better understood/ addressed. • Support for protection of existing “strategic” sites, but concerns about uncertainty/ potential losses and how this will impact on “capacity gaps.” • Core Strategy should protect existing “strategic” sites/ Municipal and commercial waste capacity and facilities for processing construction, demolition and excavation wastes (CD&EW) into aggregate. This should include SITA facilities in Tipton and Wolverhampton. 	<ul style="list-style-type: none"> • The Core Strategy addresses waste requirements for all waste streams, including commercial waste management. • The Municipal waste projections and landfill diversion targets in the Core Strategy reflect the emerging RSS apportionments and are consistent with LATS requirements. They should therefore provide a sound basis for procuring new Municipal waste infrastructure. • The Core Strategy requires new developments to take responsibility for managing the waste they generate (Policy WM5), and the proposed levels of development and growth have been factored into the requirements in Policy WM1. Policy WM1 also includes landfill diversion targets for Municipal waste and Commercial & Industrial waste, based on the emerging RSS apportionments, to help drive waste further up the hierarchy. • Management of contaminated soils is now addressed in the waste policies. Policy WM1 sets out the general requirements, Policy WM4 identifies locations suitable for the development of facilities, and Policy WM5
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		<p>requires area regeneration projects to include a strategy for managing any contaminated soils likely to arise.</p> <ul style="list-style-type: none">• The strategy aims to minimise cross-boundary movements and the export of waste by requiring new developments to manage wastes as close as possible to where they arise (Policy WM5) and by encouraging the provision of a broader range of facilities (Policy WM1, Policy WM4).• Existing waste management capacity likely to be lost as a result of changes of use within the Growth Network has been factored in to the “capacity gaps.” The gaps have been adjusted upwards to take account of potential losses and this is reflected in the overall requirements in Policy WM1.• The capacity of existing “strategic” sites (not at high risk of loss) will be protected through Policy WM2. The sites to be protected include Municipal waste facilities, commercial waste facilities (including the two facilities operated by SITA), and facilities processing waste into aggregates. These sites are identified on the Waste Key Diagram and in the schedules in Appendix 6.
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<p>CPA42: Location of New Waste and Resource Management Facilities</p>	<ul style="list-style-type: none"> • Core Strategy should aim to reduce the distance waste needs to travel by requiring local management of waste/ management as near as possible to its source. • Strategic sites should include requirements identified in Municipal Waste Management Strategies. • Core Strategy should recognise that Municipal infrastructure is likely to be merchant-driven/ involve public-private partnerships and may not all be provided within the Black Country. • Concerns that approach towards “predict and provide” and allocation of “strategic” sites in LDFs will be incompatible with the flexibility needed to procure Municipal waste infrastructure. • Request from JPE Aggregates to amend proposal at Fryers Road in Walsall – site at Talbot Close is now being pursued [subsequent letter requested that Fryers Road proposal be reinstated]. 	<ul style="list-style-type: none"> • Policy WM5 requires new developments to take responsibility for managing the waste they generate and requires them to manage waste on-site, or as close as possible to the source. • The strategic proposals identified in Policy WM3 include both Municipal waste proposals and commercial waste proposals. • Policy WM3 identifies new Municipal waste management infrastructure in the pipeline. Capacity to be provided outside the Black Country has been excluded from the residual requirements in Table 19. It will be the responsibility of each individual waste planning authority/ waste disposal authority to bring forward residual Municipal waste requirements as, when and where they are needed. • The Core Strategy provides a framework for the provision of Municipal waste infrastructure, and sets out the overall requirements for each authority (Policy WM1 and Policy WM3). Whilst it includes “strategic” proposals put forward by the authorities themselves, there is flexibility over how the
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	<ul style="list-style-type: none"> • Strategic proposal at Hill Top in Sandwell should be identified on the Key Diagram as a strategic waste management proposal. • Concerns about cumulative impact of quarrying and landfill proposals in the Aldridge area. Proposal for landfilling at Birch Lane, Aldridge should be for inert waste only, and should be subject to improvements to the local highway network to improve capacity and minimise impacts on residential areas. • SITA facilities in Tipton and Wolverhampton should be included as “strategic” sites to be retained and protected. • Core Strategy should identify suitable sites for the development of new facilities for the production of waste from aggregates and for the storage, treatment and remediation of contaminated soils, in line with emerging RSS policy – management does not necessarily require an open location and could take place on employment land using temporary “hub” sites. 	<p>residual requirements will be met. This is a matter for each authority to address through Municipal Waste Management Strategies and other DPDs.</p> <ul style="list-style-type: none"> • Fryers Road is included as a strategic proposal in Policy WM3 and is shown on the Waste Key Diagram and on Corridor Map 7. • Pikehelve Eco-Park (Hill Top) is included as a strategic proposal in Policy WM3 and is shown on the Waste Key Diagram and on Corridor Map 8. • Aldridge Quarry (Birch Lane) landfill proposal is included as a strategic proposal in Policy WM3, and is shown on the Waste Key Diagram. This is a “planning obligated” site which must be restored by landfilling within inert waste in accordance with a restoration programme approved by Walsall Council. • SITA facilities in Tipton and Wolverhampton are both identified as existing “strategic” sites to be retained and protected (see Policy WM2). In the light of subsequent correspondence with SITA, the facility in Wolverhampton is recognised as having potential for expansion and is therefore also
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	<ul style="list-style-type: none"> • Many waste management technologies are similar to industrial processes and can be accommodated on employment land. • Sufficient industrial land needs to be set aside to meet waste management requirements. • Expansion of existing facilities could contribute towards future requirements. • There is a need for flexibility over which technologies will be developed within strategic sites. • The identification of strategic sites should not rule out development of facilities elsewhere. • It may be necessary to consider co-location of different technologies and waste streams/ partnership arrangements to deliver new waste infrastructure. • Concerns about impacts of different types of waste management (e.g. composting, anaerobic digestion, incineration) and whether they are suitable in all areas. 	<p>identified as a strategic proposal in Policy WM3.</p> <ul style="list-style-type: none"> • Policy WM4 identifies locations suitable for the development of “urban quarries,” other facilities for processing construction, demolition and excavation wastes (CD&EW), and facilities for managing contaminated soils. However, the evidence does not support the identification of specific sites for this purpose, therefore Policy WM5 requires area regeneration projects to include a strategy for managing any contaminated soils likely to arise and where possible, to manage them on-site or at temporary “hub” sites within the area. • Policy WM4 identifies the waste management technologies which could be accommodated on employment land within the Black Country. It is envisaged that most of the Black Country’s waste management requirements will be met within the retained employment areas. • Technical work on employment land has confirmed that sufficient employment land will be retained within the Black Country to meet general employment and waste management
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		<p>requirements.</p> <ul style="list-style-type: none">• Expansion and improvement of existing waste management facilities is encouraged in Policy WM2 where this is not likely to give rise to conflicts with neighbouring uses.• Policy WM3 identifies a number of “strategic” proposals for new waste management infrastructure. Although in some cases there is reasonable certainty about what will be developed on these sites, in others it is less clear. It is therefore recognised that there needs to be some flexibility over what can be developed on these sites, although proposals will be expected to comply with the guidance in Policy WM4.• The Core Strategy does not rule out waste management developments on sites other than those identified in Policies WM2 and WM3. Indeed, it supports them where they comply with the guidance in Policy WM4. This policy identifies a range of locations across the Black Country which could accommodate different types of waste management operation/ technology. Such proposals will contribute towards the residual requirements identified in Table 19.
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		<ul style="list-style-type: none"> • One of the criteria for the assessment of waste management proposals in Policy WM4 is potential for co-location/ synergies. • Policy WM4 identifies suitable locations for different types of waste operation/ technology, based on the impacts the use is likely to have, and requires potential harmful effects to be addressed.
<p>CPA43: Waste Disposal</p>	<ul style="list-style-type: none"> • There should be a general opposition to landfill/ zero landfill. • Landfilling of Municipal waste should be minimised, but should continue to be made available for commercial waste. • Landfill strategy should not rely heavily on landfill provision, as landfill has greater environmental impacts/ fewer benefits than other options. • Landfill proposals should provide opportunities to promote geodiversity/ create new geological exposures. • Landfill proposals should maximise the production and capture of methane gas. 	<ul style="list-style-type: none"> • Zero landfill is not a realistic option as there will always be waste residues which cannot be managed in any other way. National policy guidance also requires that landfill should be adequately catered for (PPS10, paragraph 3). • The landfill diversion targets in Policy WM1 reflect the action being taken by the waste disposal authorities to reduce the amount of Municipal waste sent to landfill. It is anticipated that landfilling of Municipal waste will have significantly reduced by 2026. Targets are also set for diversion of Commercial & Industrial waste, in line with the national waste strategy and the emerging RSS. • The Core Strategy aims to drive waste up the

		<p>“waste hierarchy” and to promote alternatives to landfill. Although landfilling has been the dominant method of waste management in the Black Country in the past, Spatial Objective 9 makes it clear that by 2026 this will no longer be the case. However, landfill will continue to have a role in the Black Country, primarily as a means of restoring quarries and former quarries which are “planning obligated” i.e. must be restored by filling with waste.</p> <ul style="list-style-type: none">• Policy MIN5 encourages creation of new geological exposures through restoration of former mineral workings.• Policy WM4 requires landfill proposals which are likely to generate significant amounts of gas to include provision to capture landfill gas for energy.
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