



**Bromsgrove District Council Response to the Black Country Core Strategy Issues and Options Report September 2017**

1 Thank you for the opportunity to comment on Black Country Core Strategy Issues and Options Report, the below comments at this stage represents an officer response. Due to the timescales for consultation, there have not been any appropriate Council meetings for this response to be considered formally. This process will take place in October and should any amendments be required as a result of the formal consideration by Bromsgrove District Council we will advise you in due course.

2 At this early stage in the plan making process, the issues and option presented are viewed as a sensible approach to what is a substantial task of reviewing the existing Core Strategy. Whilst in principle partially reviewing the plan as opposed to a wholesale rewrite would appear to be a pragmatic. The introduction of substantial site allocations on land currently allocated as green belt into the process, may necessitate a more substantial review further down the line, should this be the view of BDC the Council will respond appropriately on this point in due course.

A number of more focused comments have been prepared relating to the key issues / sections of the report which are detailed below.

**Key Issue 2 – Meeting the housing needs of a growing population.**

3 The housing needs of the Black Country as presented under Key Issue 2 is clearly a big challenged which the plan is addressing positively. The Council accepts that a detailed piece of evidence has been presented in terms of the objectively assessed housing need, and at this stage has no reason to doubt the overall figure of 78,190. Recognition of the ongoing work being undertaken at the HMA level is welcomed, and BDC will continue to work alongside all HMA authorities in an effort to fully understand the needs of the Market area and the options for distributing growth. The 3000 houses which the Black Country Authorities have agreed to test is in principle supported. The statement at 3.19 of the report is significant and BDC agree that all the figures surrounding the housing requirement of the plan need to be tested on an ongoing basis as the plan evolves and more evidence becomes available.

**Key Issue 3 – Supporting a resurgent economy**

4 It is important that the Black Country continues to play its role in the economic prosperity of the region. The requirement of 800ha of employment land over the plan period would appear to maintain a flexible supply of land to cater for a wide range of needs. Acknowledging that the plan already envisages some existing employment land will be lost to housing, it is key that the best employment opportunities are safeguarded. If there are further opportunities for employment land to be released for other uses to minimise greenfield development then they must be considered favourably if appropriate.

#### Key Issue 6 - Reviewing the role and extent of the green belt

5 As the green belt in the Black Country has not been fully reviewed for approximately 40 years it is key that this work is now undertaken thoroughly. The Council agrees that any sites released from the green belt should be done in the context of the Core Strategy, and not left for other development plans to try and achieve. This is especially important if land outside of the Black Country area is going to be required. For any other authority to agree to take any additional development, the commitment to releasing land from the green belt in the Black Country needs to be enshrined in this plan. This commitment needs to be supported by clear policies which prioritise delivery of sites within the Black Country, before any land in neighbouring authorities is developed.

#### Key Issue 9 – Working effectively with Neighbours

6 The Council has successfully worked with the Black Country authorities over a large number of years. We look forward to continuing this approach both through the Strategic Housing Needs Study, and also ongoing liaison through the Duty to Cooperate, we would welcome the opportunity to discuss this response at the earliest opportunity.

#### Section 4. Reviewing the Strategy to Meet New Challenges and Opportunities.

7 This section of the issues and options report is seen as the most important by the Council, decisions made under this heading will have far reaching and long term effect for people, the environment, and the economy both within the Black Country and also beyond its boundaries. The 8 growth options identified on table 2 will all have differing implications and opportunities, some of which could have direct impacts on Bromsgrove District. The Council is not objecting to growth in principle, indeed it will shortly be embarking on a review of its recently adopted plan, including releasing land from the green belt. At this stage the Council is not able to form any definitive views on the options as they are presented. It would seem that all the options in one form or another could involve land being required outside of the Black Country and possibly in Bromsgrove District.

8 The Council would welcome the opportunity to explore these options further; once more information is available as a result of the call for sites process. Understanding what land is being proposed within, and on the periphery of the Black Country is important to begin to assess if any areas being put forward will have an impact on the District, in both positive and negative terms. Options need to be considered holistically in the context of the Core Strategy and the functions and purposes of the green belt around the Black Country. They must also be considered in the context of any emerging review of the Bromsgrove plan. If land is proposed to be released in the areas of Black Country near Bromsgrove or vice versa, full consideration must be given to ascertain if there are approaches which can complement both authorities plans, and bring benefits to both areas.

#### Policy Area E

9 Transport infrastructure both existing and new is vital to the success of the Core Strategy, the road links between Bromsgrove and the Black Country are heavily used and in some instances congested. Recent disruption caused by work being undertaken on the M5 at Oldbury has highlighted how infrastructure issues north of the District have significant effects across Bromsgrove, this is especially relevant for transport networks and the motorways in particular.

10 The Council welcome the statement made at para 6.1.28 *'following the issues and options stage further transport modelling will be undertaken to forecast the traffic impacts of the specified green belt scenarios, identify locations that may require further investigation regarding traffic impacts and identify the transport infrastructure requirements for any potential new green belt sites (including highway, public transport, walking & cycling routes).'* It is our view that the location of development should, along with all the other evidence, be informed by the consideration of the results of highways modelling as described above, and modelling should not be used simply to identify the mitigation required from a pre chosen site.

11 Bromsgrove DC has been working closely with Worcestershire County Council in response to the Worcestershire Local Transport Plan 4 to begin the preparation of a transport strategy for the north Worcestershire area. As part of this strategy the links and journeys by all modes, between north Worcestershire and the Black Country, and also those that pass through north Worcestershire will need to be understood. Following on from that the implications of range of development scenarios will need to be tested to inform final choices about development locations. We would welcome the opportunity to discuss this further with the Black Country. We would like to ensure that the tools that are available to assess the transport implications of developments some of which may have wider implications that just in one local authority area are used to the fullest, to ensure sustainable development patterns.

BDC Strategic Planning

6.9.17