

BROMSGROVE DISTRICT COUNCIL

Cabinet
2021

20th October

Bromsgrove District Council – Response to the Draft Black Country Plan

Relevant Portfolio Holder	Councillor Adam Kent
Portfolio Holder Consulted	Yes
Relevant Head of Service	Ruth Bamford
Report Author Mike Dunphy	Job Title: Strategic Planning and Conservation Manager Contact email: m.dunphy@bromsgroveandredditch.gov.uk Contact Tel: 01527 881325
Wards Affected	All Wards
Ward Councillor(s) consulted	No
Relevant Strategic Purpose(s)	<ul style="list-style-type: none">• Affordable and Sustainable Homes• Communities which are Safe, Well Maintained and Green• The Green Thread runs through the Council Plan
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Cabinet RECOMMEND to Council that:-

- 1.1 The Council endorses the officer response to the Draft Black Country Plan (as attached at Appendix A) and that it is confirmed with the Black Country Authorities as such.**

2. BACKGROUND

- 2.1** On the 16th August 2021 the Black Country Authorities published the Regulation 18 version of the Black Country Plan (BCP), more commonly known as the Preferred Option. This is the first full plan with policies and development allocations that has been published as part of the BCP review. Previous consultation was undertaken in 2017 on the issues and options for the BCP, BDC responded to this earlier consultation at that time.
- 2.2** The BCP covers the whole of the Black Country geography, of Dudley, Sandwell, Walsall and Wolverhampton local authority areas. The plan is a considerable document with strategic policies which apply to the

whole of the Black Country, and more detailed and specific policies and allocations for each of the individual authority areas.

- 2.3 As with most Local Plans perhaps the most keenly viewed section is the development targets identified in the plan, particularly the housing and employment development. The housing and employment levels for the BCP have been reproduced below.

	Housing Units	Employment Hectares
Capacity within Black Country	47,837	355
Capacity to be exported	28,239	210
Total Requirement	76,076	565

- 2.4 The levels of housing and employment have been established using the government's standard method for calculating housing need, and well-established practices of identifying employment development needs. The significant point to note when considering the development requirements, is not only the overall needs identified, but also the capacity which cannot be accommodated within the Black Country. What is clear is that the Black Country Authorities will be looking to other Local Authorities to accommodate a significant proportion of their growth.
- 2.5 The 47,837 dwellings and 355 hectares of employment land which are to be accommodated within the Black Country are largely being met on brownfield land. The BCP also includes a review of the Green Belt surrounding the Black Country, the outcome of this review is to release Green Belt land for 7720 homes and 48 hectares of employment land.
- 2.6 The Green Belt in Dudley Borough adjacent to Bromsgrove District has not been allocated for development, except for one site for 115 dwellings north of Hagley. The majority of the land between the edge of the Black Country and the Bromsgrove administrative boundary is deemed to be both significant in terms of the function of the Green Belt, and also due to the high historic landscape character, BDC has no reason to dispute these conclusions.
- 2.7 There are two main points which form the substance of the suggested response to the Black Country;
- The approach the plan takes to addressing wider housing needs;
 - The evidence to support the proposed housing allocation north of Hagley.
- 2.8 The additional land required to meet the development needs of the Black Country is something which the BCP does not attempt to resolve to any great extent in this plan. The small indication that the plan does give on where it would support growth identifies that it should be in locations adjacent to the administrative boundaries. The ruling out of land adjacent to the Bromsgrove administrative boundary, in terms of Green Belt harm and historic landscape character, would appear to suggest that Bromsgrove District, adjacent to

Dudley Borough is not a location which the BCP supports for additional growth. As the land on the Black Country side of the boundary has been judged as being not suitable for development, any development on the Bromsgrove side would be in the isolated countryside and therefore also not suitable for development. BDC's response on this matter is expressed in para's 2-6 of appendix A to this report.

- 2.9 As stated above, one site north of Hagley has been identified as a possible allocation for 115 dwellings. Officers have reviewed the evidence supporting the allocation of this site and have found some discrepancies in the assessment that has been undertaken. Further to this, the full infrastructure impacts of this site are not fully explained or evidenced in this version of the plan. As with the approach taken to other local authorities plans, it is suggested that BDC officers will liaise with the Black Country Authorities, to understand these issues fully before the next version of the plan is published. BDC's response on this matter is expressed in para's 7-11 of appendix A to this report.

3. FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications associated with this report

4. LEGAL IMPLICATIONS

- 4.1 The Black Country Authorities have published this plan in accordance with Regulation 18 of the Town & Country Planning (Local Planning) (England) Regulations 2012.
- 4.2 It is important that Bromsgrove District Council continues to engage in this process under the Duty to Cooperate as the plan progresses to its next stage.

5. STRATEGIC PURPOSES - IMPLICATIONS

Relevant Strategic Purpose

- 5.1 The response to the BCP in itself does not have any direct implications for the strategic purposes at this stage. Ensuring that BDC is engaged and where appropriate influence plan making activities of adjoining authorities will ensure that the strategic purposes are not undermined by the plans of other local authorities.

Climate Change Implications

- 5.2 Understanding the infrastructure requirements of the potential allocation north of Hagley will allow the Council to make a fuller

assessment of the impacts on the district, including any impact from additional traffic generated from this development.

6. OTHER IMPLICATIONS

Equalities and Diversity Implications

- 6.1 The response has no Equality or Diversity implications.

Operational Implications

- 6.2 There are no operational implications.

7. RISK MANAGEMENT

- 7.1 The risks associated with not submitting a representation is that BDCs views will not be taken into account by the Black Country Authorities when progressing the BCP

8. APPENDICES and BACKGROUND PAPERS

Appendix 1 – BDC response to Black Country Plan

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9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Adam Kent	6 th October
Lead Director / Head of Service	Ruth Bamford	6 th October
Financial Services	James Howse	6 th October
Legal Services	Claire Felton	6 th October
Policy Team (if equalities implications apply)	N/A	
Climate Change Officer (if climate change implications apply)	N/A	