

**Wolverhampton Local Plan**

**Issues & Preferred Options (Regulation 18)**

## **Consultation Statement**

**(including a summary of the main issues raised  
by the Draft Black Country Plan (Regulation 18)  
Consultation 2021)**

**Supporting Evidence Document**

**February 2024**

## 1. Introduction

1.1 All Local Planning Authorities (LPAs) have a plan which provides the framework for the future planning of the area and contains policies for the determination of planning applications. Wolverhampton has a Local Plan which is made up of a number of documents:

- The Black Country Core Strategy (BCCS) (2011)
- Bilston Corridor Area Action Plan (AAP) (2014)
- Stafford Road Corridor AAP (2014) and
- Wolverhampton City Centre AAP (2016)
- Saved parts of the Wolverhampton Unitary Development Plan (2006)

1.2 These Plans together provided the framework to allocate development to meet Wolverhampton's needs up to 2026, with allocations being made through the AAPs

1.3 In addition to the Wolverhampton Local Plan, two Neighbourhood Plans were prepared by local community groups covering Tettenhall and Heathfield Park. These Neighbourhood Plans can only be updated by the local community and are not part of the Wolverhampton Local Plan work.

1.4 City of Wolverhampton Council (CWC), together with the other Black Country Local Authorities (BCLAs) (Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council and Walsall Council), were involved in both the preparation of the Black Country Core Strategy (BCCS) (2011) and its replacement - the Black Country Plan (BCP), where the first stage of public consultation occurred in 2017 with an Issues & Options consultation, before progressing to Draft Plan (Regulation 18) consultation in Summer 2021. Work on the BCP officially ceased in October 2022.

1.5 The preparation of the Wolverhampton Local Plan (WLP) commenced in November 2022 and to progress the WLP as quickly as possible, it will build on the extensive work that took place recently to develop the BCP. This means

making use of existing evidence, draft policies and responses made to the Draft BCP consultation, where these are still relevant.

- 1.6 To facilitate this, the WLP will have the same scope as the BCP – covering all strategic policies for Wolverhampton and all housing and employment allocations, with the exception of sites in Wolverhampton City Centre. This gap will be filled by the Wolverhampton City Centre Supplementary Plan which will provide up-to-date site allocations for the City Centre area.
- 1.7 The Council has an adopted Statement of Community Involvement (SCI) <https://www.wolverhampton.gov.uk/planning/planning-policies/statement-community-involvement>, setting out how the Council will engage with local communities organisations, stakeholders and statutory bodies in its plan preparation. The BCP consultations were carried out in accordance with the SCI.
- 1.8 This Consultation Statement provides an overview of the consultation process carried out by CWC which has led to the preparation of the new WLP, providing an overview of the engagement activities during the local plan-making process of the Draft BCP consultation both individually and jointly with the other Black Country Authorities, including detailing how individuals, groups and stakeholders were invited to make representations to inform the Local Plan process. This statement includes a summary of the main issues raised by the Draft Black Country Plan (Regulation 18) Consultation (2021) (please see appendix) and the approach and methods of engagement for the Wolverhampton Local Plan Issues & Preferred Options (Regulation 18) Consultation.
- 1.9 Consultation on the WLP will be carried out at each relevant stage of the plan making process as part of the following timetable:

Issues and Preferred Options Consultation (Regulation 18)	26 February – 10 April 2024
Publication Consultation (Regulation 19)	Dec 2024 – Jan 2025
Submission to Government	June 2025
Independent Examination by Planning Inspector	June 2025 – Spring 2026
Adoption by City of Wolverhampton Council	Mid 2026

## **2. Draft Black Country Plan (Regulation 18) Consultation**

2.1 The Draft Black Country Plan (Regulation 18) consultation took place for eight weeks between 16 August – 11 October 2021. CWC, alongside the other BCLAs, consulted widely. Notification emails and letters, providing information on the consultation and how to engage and respond, were circulated to everyone on the consultee database, comprising c. 2,300 people/ organisations, including statutory consultees, residents, organisations and agents.

### **Methods of Engagement (Black Country Wide & Wolverhampton Specific)**

2.2 CWC undertook Member briefings in the run-up to the Cabinet meeting which sought authority to undertake the Draft Plan Consultation. In addition, internal engagement across relevant departments within the Council were carried out and once the consultation commenced, emails and bulletins were used across the Council to raise awareness of the consultation.

2.3 External to CWC, a variety of methods were used to raise awareness of the consultation to the stakeholders in points A-E below:

#### **A. Communities**

- Press releases were issued via the BCLAs. These were placed on Council websites, social media channels and were reported in the local press.

- Paper copies of the consultation documents and response forms were made available in libraries and council buildings across the BCLAs and some libraries in neighbouring South Staffordshire libraries. For CWC the consultation documents and response forms were made available at CWC's Civic Centre and Wolverhampton Central, Bilston and Wednesfield libraries. Accessible formats for documents were made available during the consultation.
- CWC published information about the consultation in its news bulletins, through various partner networks, social media channels and awareness was raised by local councillors.

## **B. Businesses**

- Received notification through press releases and articles
- Promotion through the Black Country Local Economic Partnership (LEP) and Chamber of Commerce channels
- Promotion through Councils' Economic Development contacts

## **C. Landowners and agents**

- Promoters who had submitted sites through the Call for Sites process and agents/ consultants on the consultation database, including those who had submitted representations to the 2017 BCP Issues & Options consultation, received notification of the consultation

## **D. Statutory Consultees /Partners**

- Statutory consultees, prescribed bodies and partners (such as the Black Country LEP and West Midlands Combined Authority (WMCA)) received notifications of the consultation.

## **E. Duty to Co-operate**

- Duty to Co-operate bodies were notified during the preparation of the BCP process and of the consultation through formal Duty to Co-operate correspondence and meetings.

2.4 A range of materials and approaches were used throughout the consultation process, including:

A. A Statement of Representation Procedure Notice published in the Express & Star newspaper on 13 August 2021:

**Black Country Local Authorities**  
**Statement of Representations Procedure Notice**

*Making representations on the Draft Black Country Local Plan Documents Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012*

**Title of the Plan:**  
**Draft Black Country Plan**

**Subject Matter and area covered by the Plan:**  
The four Black Country Local Authorities (Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council) have published the Draft Black Country Plan that it intends to consult on for a period of eight weeks (16th August 2021 - 11th October 2021). The Draft Black Country Plan will cover the whole of the administrative areas of Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council and City of Wolverhampton Council, and includes a wide range of planning policies. The Draft Black Country Plan sets out a vision, objectives and spatial strategy to 2039. The Draft Black Country Plan allocates sites that are needed to accommodate new development and areas to be protected and enhanced. The policies in the Plan will be used to make decisions on planning applications. The monitoring framework sets out how the Plan will be monitored.





**Period for making representations:**  
Representations are invited on the Draft Plan for a period of eight weeks beginning on Monday 16th August 2021 and ending on Monday 11th October 2021 at 5.00pm. Representations received after this time will not be accepted.

**Where to inspect the documents:**  
The Draft Black Country Plan and associated submission documents and representation forms are available to view from the Black Country Plan website <https://blackcountryplan.dudley.gov.uk/t2/p5/>. Copies will also be available in key Council buildings and main libraries. Further details can be obtained via the Black Country Plan website <https://blackcountryplan.dudley.gov.uk/t2/p5/> or by contacting the Black Country Plan Team on 01384 814136.

**How to make representations and address to which representations should be sent:**  
The easiest way to comment on the draft plan is via our online portal at <https://blackcountry.oc2.uk/document/55>. Guidance notes on how to make a comment are provided on this webpage.  
By e-mail: You can download a comments form from <https://blackcountryplan.dudley.gov.uk/t2/p5/> to complete and return by email to: [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk)  
If you are unable to access the online comments form you can make your comments by post: You can either download a copy of the comments form from <https://blackcountryplan.dudley.gov.uk/t2/p5/> or request a copy by calling 01384 814136.  
Please return your comments form by post to: Black Country Plan, Planning & Regeneration  
4 Ednam Road, Dudley, DY1 1HL or by email [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk) or by leaving a copy at your local library.  
At this stage, comments and representations are requested on the Draft Black Country Plan and the Sustainability Appraisal. Representations received cannot be treated as confidential and will be publicly available and published on the Black Country Plan website. Telephone numbers, addresses, signatures, and email details will not be published. Please see the full Privacy Notice at <https://blackcountryplan.dudley.gov.uk/uk-gdpr-privacy-notice>

**Request for notification of Local Plan progress:**  
The hard copy and online representation forms contain an option to request further notifications in relation to the progress of the Local Plan, specifically relating to the following stages:

- Publication version of the Local Plan for consultation
- Submission of the Local Plan to the Secretary of State for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004
- Publication of the recommendations of the Planning Inspector appointed by the Secretary of State to carry out the independent examination
- Adoption of the Local Plan by the Council
- Future revisions to the Local Plan, new planning policies and guidance

B. Press Releases - CWC published news releases in advance of, and throughout, the consultation covered in re: new electronic newsletter 12 August 2021

C. Press Adverts - were placed in the Express & Star local newspaper to advertise the consultation

D. Website - copies of the consultation documents were made available on a dedicated Black Country Plan website along with providing Frequently Asked Questions, summary documents, downloadable comments forms and ebulletins,

a consultation video, online consultation portal, evidence base documents and contact details. Over 43,000 hits were made to the website.

- E. On-line Consultation materials** – an online portal and interactive map was used for people to view the Draft BCP policies, maps and site allocations.
- F. Paper copies** of consultation documents/ comments forms were made available in libraries and council buildings across the BCLAs and some libraries in neighbouring South Staffordshire libraries. For CWC the consultation documents and response forms were made available at CWC's Civic Centre and Wolverhampton Central, Bilston and Wednesfield libraries. Accessible formats for documents were made available during the consultation.
- G. Radio Adverts** – promoting the BCP consultation were run throughout the consultation period on Free Radio Black Country & Shropshire and Free Radio Black Country with a potential reach of 188,560 listeners, and Black Country Radio with a potential reach of 310,000 listeners.
- H. Social Media** - posts were advertised through paid-for social media Facebook and Instagram. This generated approximately 12,300 clicks, 261,000 impressions and 201,000 video plays. The BCLAs used their own social media channels to publicise the consultation. CWC undertook 32 social media posts with 75,500 impressions and a total reach of 458,100.
- I. An Advertisement campaign** was displayed on 100 lower rear buses across the Black Country for the 8 weeks of the consultation, which had a reach to 669,530 adults.
- J. Online public events** - adapting to the implications of prevailing Covid-19 restrictions, two online Black Country consultation events were held via Microsoft Teams where stakeholders were invited to book a place to attend. The sessions provided a presentation on the Draft BCP and a Question-and-Answer session. The events were held on 7 September 5.30pm to 7.00pm and 8th September 1.00pm to 3.00pm 2021. The events were recorded and copies added to the BCP website.

**K. Consultation Flyers/ Posters** were distributed to all medical and leisure centres within CWC's administrative area.

### **Call for Sites**

- 2.5 It is expected that Local Planning Authorities (LPAs) conduct a 'call for sites' exercise when they are reviewing their Local Plans, particularly as the Government requires this exercise to be undertaken as a key component of Strategic Housing and Economic Land Availability Assessments. A call for sites exercise involves a public advert where landowners are invited to indicate with a plan and accompanying details if they have land available for potential redevelopment for housing, employment or other uses. The sites identified are then assessed in detail by LPAs, and if considered to be suitable, will be included in planning documents for public consultation as part of the plan making process. The call for sites process has played a significant role in identifying deliverable site options across the CWC's administrative area.
- 2.6 As part of BCP preparation, a call for sites exercise has been conducted as follows:
- 2017-2019 – a BCP two-year call for sites exercise
  - 2020 – a 6 week 'call for sites' exercise as a result of the Covid pandemic and delay to the BCP timetable
- 2.7 At each stage stakeholders (landowners/ developers/ agents) were invited to submit sites for consideration through the plan making process. A questionnaire was produced to facilitate the collection of information on sites and stakeholders were able to plot sites themselves via a consultation portal and online mapping process. Paper and email responses were also accepted. All the 'call for sites' identified from the above can be viewed on the BCP website.
- 2.8 The Wolverhampton call for sites exercise has been continually open, with a relaunch in 2023 following the commencement of the WLP preparation.



## **Consultation Responses**

2.9 The Black Country Plan consultation was far reaching and generated a significant response of approximately 19,500 respondents. There were numerous responses to the BCP's Wolverhampton-specific chapter, including a number of group responses relating to Wolverhampton sites, totalling over 1,000 respondents. Whilst work has ceased on the Black Country Plan the responses to the consultation have been used to inform the preparation of the Wolverhampton Local Plan. A summary of the main issues raised by the Draft Black Country Plan (Regulation 18) Consultation (2021) is set out in the appendix.

### **3. Wolverhampton Local Plan Issues & Preferred Options (Regulation 18) Consultation**

3.1 The WLP Issues & Preferred Options (Regulation 18) consultation will take place for six weeks from Monday 26 February to Wednesday 10 April 2024. Comments received as part of this consultation will be considered and inform the preparation of the next stage of the WLP - the Publication Plan (Regulation 19).

#### **Methods of Engagement**

- 3.2 CWC will email/mail everyone on its Local Plan consultation database to inform them of the consultation, where they can view the consultation documents, attend drop-in sessions and how to respond to the consultation.
- 3.3 Internal engagement has taken place within CWC and member engagement via briefings has taken in place in advance of the Cabinet meeting requesting approval to publish the WLP for Issues & Preferred Options (Regulation 18) consultation. This will continue throughout the plan preparation process.
- 3.4 Meetings with stakeholders, such as Duty to Co-operate bodies, take place on an on-going basis, including during the consultation.

3.5 A range of materials and approaches will be used throughout the consultation process, including:

- Press Releases - CWC will publish news releases in advance of, and throughout, the consultation
- Publishing a Procedural Notice in the local press
- Press Adverts will advertise the consultation in the local press
- CWC communication channels, including stakeholder newsletters, such as the “re:new” regeneration e-bulletin
- Digital advertising – the consultation will be advertised on digital display screens in CWC Civic Centre, CWC ‘WVActive’ Leisure Centres and Wolverhampton Central Library
- Social Media channels will be used by CWC to advertise the consultation
- Website – a WLP webpage will contain the information, consultation documents including an interactive map and the evidence base relating to the WLP
- An online survey/ response form on CWC’s consultation portal will
- Paper copies of consultation documents and comments forms will make up consultation packs for public viewing at CWC Civic Centre and be distributed to all Wolverhampton libraries, together with posters and flyers
- Drop-In Sessions – where members of the public can view the consultation documents and speak to Planning Officers will take place during the consultation at CWC Civic Centre and libraries.

# Appendix

## Summary of the main issues raised by the Draft Black Country Plan (Regulation 18) Consultation (2021)

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## Summary of the main issues raised by the Draft Black Country Plan (Regulation 18) consultation (August – October 2021)

1) Introduction			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
Introduction	24	611	174

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(type of respondents which raised these issues highlighted in bold)</i>
Introduction	<p><b>Residents, Local Authority and Political Group</b></p> <ul style="list-style-type: none"> <li>• Objections were raised to the principle of developments on the Greenbelt (GB) and Greenfield land within included: <ul style="list-style-type: none"> <li>○ GB should be protected from development.</li> <li>○ Greenfield land should not be developed.</li> <li>○ Brownfield should be developed first before the GB and a Brownfield First approach should be explicit in the plan.</li> <li>○ Mental and physical health benefits of green spaces</li> <li>○ Detrimental impact on wildlife</li> <li>○ Would be better to identify new towns to address the housing crisis.</li> <li>○ Not all Brownfield sites have been identified, further capacity could be found by looking at vacant retail units.</li> <li>○ Pressure on existing infrastructure (including education and health facilities)</li> <li>○ Pressure on highway safety and increased traffic</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ New planting and landscaping won't compensate for the loss of GB.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• The level of new housing proposed in the Plan is not justified. Object to the use of algorithms to determine housing need. Local authorities are better placed to do this.</li> <li>• Objections to the overall level of growth in the plan as it will increase the size of the conurbation and put more pressure on services and increase congestion. Provision for growth should be made elsewhere in the UK.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• The SA as currently prepared is unsound as the BCA has failed to identify and test the sustainability implications of a growth option within a range of between 50,000–70,000 dwellings as a reasonable alternative.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Air quality mitigation should be referenced throughout the Plan in a number of policies.</li> <li>• The Air Quality Policy states that all developments must be at least air quality neutral, however, with the revised WHO Guidance on Air Quality this ambition must surely be raised beyond the current position rather than only expecting a neutral impact.</li> </ul>
	<p><b>Community Group</b></p> <ul style="list-style-type: none"> <li>• Object to urban areas being targeted for development leading to the loss of brownfield sites which have the same potential for wildlife rehabilitation as greenbelt.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• No council should be offering to build houses for another so someone else's green belt can be destroyed.</li> <li>• The Black Country shouldn't be meeting Birmingham's housing need. Councils should be planning for the whole conurbation, including Birmingham and Solihull.</li> <li>• Empty homes should be filled before new ones are built</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• We find the Sustainability Appraisal lacking in its consideration of the water environment baseline data and overarching policy drivers. We recommend this is rectified and associated policies incorporated into the next version of the plan.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Support for sustainable house building in the BC. Supportive of the metro extensions and the diversification of Brierley Hill Strategic Centre</li> </ul>

	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• Approval in principle because a logical framework for future development is needed in order to ensure that such development is appropriate for any given site or provision.</li> <li>• General support for the BCP as it will meet the needs of the local area over the next 15 years. The area needs a good strategic plan.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Agree that this section is a reasonable summary of the context and underpinning principles of the plan. Concur with important observations stated in paragraphs 1.18 and 1.36 that the consultation demonstrated support for housing to be built in sustainable locations and a desire to protect the environment of the Black Country (section 1.18) and that the plan recognises that deprivation, obesity and wellbeing are issues, which negatively affect the physical and mental health and wellbeing of residents of the Black Country, that are influenced by the quality of, and opportunities within, the built and natural environment(section 1.36)</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• The following comments were received with general support for the plan: <ul style="list-style-type: none"> <li>○ The Introduction is a reasonable summary of the context and principles of the Plan, in particular the need for housing in sustainable locations and the desire to protect the environment.</li> <li>○ It is a good framework for future development and will ensure development is appropriate for any given site.</li> <li>○ Support the review as the current plan is out of -date.</li> <li>○ Welcome the recognition of the role of the environment in shaping health and wellbeing.</li> <li>○ The Plan has been well thought through and meets the future needs of the area.</li> <li>○ Support the need to address the challenge of mitigating and adapting to climate change.</li> <li>○ Support the inclusion of infrastructure to support the growth and health and wellbeing.</li> </ul> </li> </ul>
	<p><b>Parish Council</b></p> <ul style="list-style-type: none"> <li>• Over-reliance on the Duty to Co-operate. Object to the presumption that the housing shortfall can be met in other areas.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• support the Black Country Authorities' intention to draft and agree Statements of Common Ground with all relevant bodies on Duty to Co-operate issues at the Plan's Publication Stage. RBC submitted its "Duty to Engagement Proforma" in 2018 which recognised the challenges of meeting the wider housing needs of the Birmingham and Black Country Housing Market Area. RBC reiterated in this Proforma that this needs to be</li> </ul>

	<p>based on fully evidenced scenarios and progressed through development planning work by the local authorities.</p>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• Support the review and update of the 2018 Strategic Growth Study.</li> <li>• Will require further conversations regarding South Staffs' contribution to the housing need target but this will be dependent on the outcome of ongoing duty to cooperate conversations and the ongoing progression of Local Plans in our and neighbouring HMA areas.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Under the duty to cooperate local authorities are required to cooperate with Local Nature Partnerships (LNPs) and must have regard to their activities when preparing local plans. This requirement is the same as that for Local Enterprise Partnerships. No reference is made in the BCP to the Birmingham and Black Country LNP and no evidence is provided in the Statement of Consultation that the LNP was consulted.</li> <li>• This contrasts to the section Black Country Local Enterprise Partnership (1.11 and 1.12) in the BCP, and to the evidence provided in the Statement of Consultation that the LEP was consulted at length.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Questions the need for LEPs and whether their role would be better delivered by the local authorities. Questions whether their funding diverts funds away from Local Authorities.</li> <li>• The WMCA have demonstrated a lack of understanding of how the West Midlands access Birmingham. Would like local councils to be in control.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Use the WMCA's funding to reclaim brownfield sites</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• A paragraph should be added that describes the natural landscape of the Black Country.</li> <li>• The Black Country Spatial Portrait recognises the significant influence that industrial heritage has on today's physical environment but not the geological resources that shaped that industry and the pattern of settlement it left behind.</li> <li>• WTBBC welcomes the reference to the influence of the natural environment on health and wellbeing, however, the richness and value of the existing natural environment of the Black Country should be both described and celebrated in a standalone natural environment paragraph.</li> </ul>

	<ul style="list-style-type: none"> <li>• A point should be added stating that the BCP will provide a policy framework to support the commitments of the government’s 25 Year Environment Plan and the delivery of the West Midlands Combined Authority Natural Environment Plan.</li> <li>• A point should be added stating that the BCP will provide a policy framework that recognises, encourages investment in and capitalises on the value and benefits that the natural environment provides to the communities of the Black Country</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• On Climate Change and protecting and enhancing the environment: <ul style="list-style-type: none"> <li>○ WTBBC welcome the BCP’s recognition of the need to address the challenge of mitigating and adapting to the impacts of climate change. WTBBC also welcome recognition of the need to create a strategy for the enhancement and protection of the Black Country’s environment. Explicit reference should be made, however, to the natural environment.</li> <li>○ This paragraph could be further strengthened through an explicit recognition of the wide range of benefits (ecosystem services) that the natural environment provides the Black Country, and the need to further understand and invest in green infrastructure to maximise benefits in mitigating and adapting to climate change.</li> </ul> </li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Supports the inclusion of providing infrastructure to support growth (part g) and health and well-being (part h) within the key challenges and issues to be addressed in the proposed plan.</li> </ul>



2) The Black Country 2039: Spatial Vision, Strategic Objectives and Strategic Priorities			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
The Black Country 2039: Spatial Vision, Strategic Objectives and Strategic Priorities	14	20	33

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(type of respondents which raised these issues highlighted in bold)</i>
The Black Country 2039: Spatial Vision, Strategic Objectives and Strategic Priorities	<b>Local MP</b> <ul style="list-style-type: none"> <li>• Would like a brownfield first strategy for new development</li> </ul>
	<b>Residents</b> <ul style="list-style-type: none"> <li>• The policies don't investigate infrastructure.</li> <li>• Will the Draft Plan be paused in light of the Prime Minister's address to the Conservative Party Conference, i.e., that there will be no homes built in the green belt</li> </ul>
	<b>Stakeholder</b> <ul style="list-style-type: none"> <li>• Would like the Vision to be more localised and ambitious with the natural world at its centre.</li> </ul>
	<b>Developer</b> <ul style="list-style-type: none"> <li>• The vision is too brief and simplistic</li> </ul>
	<b>Landowner</b> <ul style="list-style-type: none"> <li>• The vision and objectives should be updated to cover a 30-year period</li> </ul>
	<b>Local Organisation</b> <ul style="list-style-type: none"> <li>• The vision is too inward looking and doesn't take account of what is happening in adjacent areas.</li> <li>• The vision has missed an opportunity to reference creating a healthier and more active Black Country</li> </ul>
	<b>Resident and Various Landowners and Organisations</b> <ul style="list-style-type: none"> <li>• General support for the Vision and Objectives of the Plan Recognising the Challenges faced by the Black Country</li> </ul>
	<b>Stakeholder</b>

	<ul style="list-style-type: none"> <li>• The key diagram should show Strategic Waste Infrastructure facilities</li> </ul> <p><b>Housebuilder</b></p> <ul style="list-style-type: none"> <li>• Green belt release needs to be referenced within the spatial strategy to ensure it is enshrined within the Plan.</li> <li>• Providing a range of brown and greenfield sites will meet a range of housing needs as brownfield sites generally yield higher densities than greenfield.</li> <li>• New development will deliver significant levels of new POS and infrastructure.</li> </ul> <p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• There is evidence that the BCP will fail to meet the Black Country strategic objectives and in some cases will have a negative impact.</li> <li>• The NPPF sets out the strategic policies to be contained within a local plan. The tabulation of objectives sets out strategic priorities in terms of preferred outputs and generally fails to identify policy outcomes in terms of quality of provision, opportunities and aspirations for residents and nature, quality of place.</li> </ul>
SP1 and SP2 – Climate Change	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• The Plan does not set a target for achieving zero net carbon emissions which should be included within a strategic climate change policy.</li> <li>• The policies on climate change are relegated by housing and economic targets. There is a need to put climate change at the heart of all local decision making.</li> <li>• Food Security isn't mentioned with regard to climate change</li> </ul> <p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• The term 'Climate Change' is outdated and should be reviewed</li> </ul>
SP3 – Housing	<p><b>Housebuilder</b></p> <ul style="list-style-type: none"> <li>• There should be a greater emphasis on meeting housing need</li> </ul> <p><b>Consultant on behalf of a landowner</b></p> <ul style="list-style-type: none"> <li>• Welcome the inclusion of 'Housing that meets all our needs' as a Strategic Priority.</li> <li>• It is important for Strategic Priority 3 to be set within the context of the requirement upon a strategic plan-making authority to identify sufficient land for homes. Strategic Priority 3 should commit to meeting the obligation of identifying sufficient land for homes.</li> </ul>

SP5 – Built and Natural Environment	<p><b>Consultant</b></p> <ul style="list-style-type: none"> <li>Support for Strategic Policy 5: To provide a built and natural environment that supports the making of healthier choices through provision for physical activity and recreation, active travel, encouraging social interaction and discouraging harmful behaviours.</li> </ul>
SP7 – Economy	<p><b>Housebuilder</b></p> <ul style="list-style-type: none"> <li>Object to the loss of active employment sites</li> </ul>
SP11 and SP12 – Enhancing our natural and built environment	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>The built and natural environment should have separate objectives. This will make the objectives stronger</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Suggest amend ‘sustain’ with ‘protect’. We encourage looking at protecting the significance of heritage assets and assessing cultural heritage. Ensuring not just built assets but also landscape and features etc</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>Housing allocations contradict SP12 due to a loss of visual amenity in the areas to be developed</li> </ul>

<b>3) Spatial Strategy</b>			
<b>Policy, site allocation or main heading</b>	<b>Number in Support</b>	<b>Number Objecting</b>	<b>Number commenting</b>
Spatial Strategy Introduction	5	15	17
CSP1 – Development Strategy	16	84	70
CSP2 – The Strategic Centres and Core Regeneration Areas	9	4	12
CPS3 – Towns and Neighbourhood Areas and the Green Belt	10	62	33
CPS4 – Achieving well-design places	10	3	19
CPS5 – Cultural Facilities and the Visitor Economy	2	0	5
GB1 – The Black Country Green Belt	88	216	103
GB2 – Extensions and Replacement Buildings in the Green Belt	0	2	4

Policy, Proposal or Main Heading	Key Issues Raised by the Representations (type of respondents which raised these issues highlighted in bold)
Spatial Strategy Introduction	<p><b>Residents</b></p> <p>The responses from members of the public related in the main to the principle of developing greenfield and greenbelt sites arguing that:</p> <ul style="list-style-type: none"> <li>• The green belt should be protected at all costs.</li> <li>• Greenfield sites should not be built on.</li> <li>• Brownfield sites should be built on before considering the green belt.</li> <li>• Building on greenfield sites destroys wildlife.</li> <li>• Not all brownfield sites have been identified and so additional capacity exists for example through the contraction of the retail sector reducing the need to identify green belt locations.</li> <li>• It would be better to identify new towns to address the housing crisis.</li> <li>• The scale and location of new development will put too much pressure on school and health facilities.</li> <li>• The level of new housing proposed in the Plan is not justified.</li> <li>• Green areas are important for mental health and should not be built on.</li> <li>• Areas of open space are needed for people to take exercise.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• The strategy is not appropriate as it is focussing development into urban locations with high levels of pollution.</li> </ul>
	<p><b>Site promoters</b></p> <ul style="list-style-type: none"> <li>• A number of site promoters have supported the spatial strategy on the basis that the brownfield approach seeks to take advantage of existing infrastructure with the addition of a limited number of new growth areas near to existing settlements which takes account of environmental, climate change and accessibility requirements.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Some developers and housebuilders have suggested that while the Plan cannot allocate sites on land outside the Black Country it would be helpful if the spatial strategy could provide guidance on where the Black Country authorities will support the allocation of sites in emerging Plans.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• Concern over the cumulative transport impact of development on the network in Worcestershire.</li> </ul>

	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Support the overall Policy aim of directing the right type of development to the right locations but requesting a minor change to give greater reference to the natural and built environment.</li> </ul> <p><b>Residents, Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>Mixed views on the key diagram – some responses suggesting all allocations should be shown on the key diagram to better illustrate the spatial strategy, perhaps as dots? With others suggesting it currently meets the requirements of the NPPF by showing broad locations only.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>Has an equality impact assessment been prepared for the Plan?</li> <li>How is the Plan embracing the net zero challenge?</li> </ul>
CSP1 – Development Strategy	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>Suggestions that as the BCP is failing to provide sufficient land to meet housing needs then further green belt release in the Black Country will be required. A number of sites have been suggested in this regard. Meeting the housing need should not be deferred. The Plan has not taken into account all reasonable alternatives for housing growth and would not be justified as per NPPF para 35(b).</li> <li>Some site promoters have supported the development strategy as it increases the scope for suitably located sites to come forward to meet future needs, particularly the Neighbourhood Growth Areas.</li> <li>Suggestions that the Policy should be more explicit that the Plan is seeking to meet the full housing need including a commitment to the manner and extent to which this will be achieved through exporting some development requirements.</li> <li>The absence of Statements of Common Ground to confirm the export of development to neighbouring areas makes the Plan unsound.</li> <li>The Policy should refer to the housing figure as a minimum with the wording of ‘at least 47,837’ net homes.</li> <li>Land in South Staffordshire, Shropshire and Lichfield can provide opportunities to assist meeting Black Country housing and employment land needs.</li> <li>There are considerable risks in the reliance on neighbouring areas to meet the export expectations and this should be reflected in the Plan. Mitigation measures for this risk should also be recognised and this should include a commitment to an early review if the level of export currently required is not met.</li> <li>Other representations have welcomed the up-front reference in the Plan to the need for the exporting of growth and the work to accommodate this requirement through the Duty to Cooperate.</li> </ul>

	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Support for the spatial strategy as it focusses new development into the growth network which is well-served by an extensive public transport system.</li> </ul>
	<p><b>Local Authority, Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• The Plan should provide a clearer explanation of the circumstances of how the development needs in the Plan are being addressed in terms of providing a strategic framework / specific guidance for the exporting of growth to Neighbouring areas through the Duty to Cooperate. One representation has suggested that this be shown on the key diagram.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• A number of sites allocated for development are in close proximity and their cumulative impact will be greater than predicted.</li> <li>• Some support for the retention of existing areas of green belt including the Seven Cornfields in Wolverhampton.</li> <li>• Shopping, leisure and commercial development should be focussed into town centres to bring people back and encourage spend.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Concerns that the development densities are unrealistic and so the capacity on allocated sites is exaggerated.</li> <li>• Some developers have suggested that the housing provision of 47,837 is an over-estimate relying too much on strategic centres where there has been under-delivery since 2006.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• A number of comments mainly from members of the public that there is insufficient evidence that all brownfield sites have been identified and their capacity exhausted.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Suggested that the housing need figure does not take into account an uplift for affordable housing or economic growth.</li> <li>• The Plan housing requirement is 4,011 per annum rather than 4,004.</li> <li>• The Plan period is unclear. The Plan title is 2018-39 whereas para 3.21 refers to a housing requirement 2020-39.</li> <li>• Some developers have argued that an insufficient plan period is incorporated, and the Plan needs to extend beyond 2039. This on the grounds that where new settlements or significant extensions to towns form a part of the strategy for an area then policies should set a vision which extends over a longer period.</li> </ul>

	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• A number of concerns from members of the public over the basis for the housing requirement in terms of whether the method is accurate and fit for purpose in the light of Brexit and the CV-19 pandemic.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Some support for the principle that exceptional circumstances have been demonstrated for the purposes of removing land from the green belt.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• The term Neighbourhood Growth Areas refers to large scale development on green belt sites and this should be made clear.</li> <li>• There is no definition of exceptional circumstances to remove land from the green belt.</li> <li>• Will any land be converted to green belt to mitigate the loss of land proposed in the Plan to prevent urban sprawl?</li> <li>• New housing and employment development should take place on brownfield sites only. No development on greenfield or green belt sites.</li> <li>• Some responses suggesting that greenfield and green belt sites should only be developed once all brownfield opportunities have been built out.</li> <li>• Development on greenfield sites will harm wildlife.</li> <li>• Parks, nature areas and sports pitches should be enhanced to benefit local people.</li> <li>• Brownfield sites should be built on as they benefit from better infrastructure.</li> <li>•</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Part 1a of the Policy should refer that the provision of new homes will include a range and choice of dwellings.</li> <li>•</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Recommend that Part 1c of the Policy refers to Agents of Change.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Support for part 1c of the Policy and its reference to physical, social and environmental infrastructure to meet needs.</li> </ul>
	<p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>• Part 2a of the Policy should confirm that while the majority of development will be in the existing urban area there will be green belt release to help meet needs, and that this should be recognised in Table 2.</li> <li>• Part 2e of the Policy should explain that whilst the general principle that inappropriate development in the Green Belt will be resisted, this would not be the case where Very Special Circumstances exist.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Recommend that Part 2f includes a specific clause that refers to the need to protect, and where possible, enhance the significance of heritage assets including their setting.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Concerned that the reference to ‘where practical and possible’ in reference to the landscape, nature conservation and agricultural land being protected and enhanced. This caveat allows for the redrawing of green belt boundaries as proposed elsewhere in the plan, but its use here weakens the BCA’s assertion that the green belt and the network of green wedges and corridors is valued for the benefits it provides the Black Country.</li> <li>• The Wildlife Trust asks that Part 2g of the Policy should be expanded to reference the multiple benefits of green infrastructure in mitigating the likely impacts of climate change.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• The spatial strategy should reference measures to define Quality of Place building on CABE reports.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Recommend that the Policy references risks posed in respect of land instability given the coal mining legacy.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• The draft Local Nature Recovery Network Map has been published as part of the Plan, but this should be included as a planning policy in the Plan. Biodiversity Net Gain funding requirements for its delivery should be set out.</li> <li>• Cross-cutting natural and built environment policies for river corridors, canals and the Geopark should be included in the strategy.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Some of the proposed sites breach the environmental capacity of the area and a number are neither sustainable or deliverable.</li> <li>• Support for Spatial Option G focus on more open space.</li> </ul>



	<ul style="list-style-type: none"> <li>• There is no reference to the Nature Recovery Opportunity Map and how this has informed the strategy or site allocations.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• The housing requirement of 76,076 is less than the Standard Method housing requirement identified by the Black Country Housing Market Assessment 2021</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Will the shortfall of 28,2389 homes be planned for elsewhere in the region?</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• The basis for the contribution from South Staffordshire should not be based on the Strategic Growth Study but on the scale of the need and associated shortfall. The existing offer of 4,000 homes could be increased and it is not clear what proportion of the contribution is to meet needs arising in the BC in any case as distinct from the wider HMA.</li> <li>• A Joint Statement of Common Ground should be prepared across the HMA which confirms how the shortfall will be accommodated by each local authority area.</li> <li>• There is insufficient evidence of positive and continuous engagement with Lichfield Council and the higher scenario of housing from Lichfield should be pursued.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• RBC is unlikely to be able to make a cross-boundary contribution to meeting Black Country needs as there are no common boundaries.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• There are concerns over the densities which can be delivered on existing / proposed sites which will reduce the development capacity of the proposed supply and strengthen the justification for the identification of additional sites.</li> <li>• The current published Housing Market Area Position Statement is not up to date and is in need of review. This review should form the basis for further work set out in a Statement of Common Ground on how the shortfall will be distributed and delivered.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• The figures set out in the Plan and the Urban Capacity Study are similar but are set out in slightly different ways – this needs to be addressed in the next version of the Plan.</li> </ul>
	<p><b>Stakeholder</b></p>

CPS2 - The Strategic Centres and Core Regeneration Areas	<ul style="list-style-type: none"> <li>Support for the recognition of a high-quality natural environment in the Strategic Centres, and to the networks of attractive green infrastructure in the Core Regeneration Areas in the Policy.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>The Policy is not consistent with the Vision or the Spatial Strategy because there is no reference to the Neighbourhood Growth Areas which are fundamental elements of the Strategy. They should be given equal weight to the Strategic Centres and Core Regeneration Areas in the Strategy.</li> <li>Support the reference to the Core Regeneration Areas being the principal concentrations of high-quality employment areas, to be safeguarded and enhanced to support the long-term success of the local economy.</li> <li>Support for the Strategic Centres and Core Regeneration Areas as the principal locations for strategic growth given their sustainable locations and accessibility.</li> <li>The Policy is not safeguarding and enhancing sustainable employment land as a number of such sites are proposed for redevelopment to housing.</li> </ul>
	<p><b>Stakeholders, Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>While the overall aim of the Policy is supported further capacity should be identified in these locations given the scale of the shortfall and the scope for additional supply to be brought forward through the restructuring of the retail and other commercial sectors. Part 4d of the Policy should refer to the housing target for these areas as a minimum.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Support for the focussing of growth into these areas but it is noted that there may be capacity challenges in some areas and until the Transport modelling has been completed it cannot be confirmed as to whether these impacts can be mitigated.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>There should be some caution with focussing development into these inner urban locations as these are the areas most challenged by economic viability and so it may be more challenging to secure affordable housing through this approach.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>The implications of areas being within a Strategic Centre or Core Regeneration Area are unclear.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>The Policy would benefit from a reference to themes of the historic environment and heritage.</li> </ul>
	<p><b>Stakeholder</b></p>

	<ul style="list-style-type: none"> <li>Part 3b of the Policy would benefit from a reference to uses for sport and recreation as the reference to leisure is taken to mean commercial leisure.</li> </ul>
CSP3 - Towns and Neighbourhood Areas and the green belt	<p><b>Residents</b></p> <p>The responses from members of the public related in the main to the principle of developing greenfield and greenbelt sites arguing that:</p> <ul style="list-style-type: none"> <li>Green belt land should not be developed under any circumstances.</li> <li>The building of new homes in the green belt is not 'very special circumstances' or 'exceptional circumstances'.</li> <li>The proposed development sites in the green belt have been places for local people to enjoy the beauty and tranquillity of the area and should be protected.</li> <li>Greenfield sites should not be developed until all of the brownfield land is used.</li> <li>The loss of 6% of the green belt cannot be justified where there is an availability of brownfield land.</li> <li>Question marks over the availability of brownfield land given the independent study commissioned by the West Midlands Combined Authority (Solihull MBC).</li> <li>Green belt land is important for its wildlife value, flood protection and for food production.</li> <li>There is sufficient brownfield land available to meet the Governments housing targets.</li> <li>How can we be certain that the proposed amended green belt boundaries will be permanent?</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>The Councils have examined all reasonable options for meeting the need for development outside the green belt and so 'exceptional circumstances' are clearly demonstrated in light of the significant shortfall in employment land required.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Suggest that the coordination of the phasing of Neighbourhood Growth Areas and other strategic developments, so that surplus bulk excavation spoil can be managed to offer 'Mass-neutral' construction of building platforms and minimise the need for waste disposal.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>The term Neighbourhood Growth Areas refers to large scale development in the green belt and this should be made clear.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Objects to the inclusion of the Neighbourhood Growth Areas (NGAs) in Policy CSP3 (b). They are identified as 'highly' sustainable. There is no definition of what highly sustainable means, nor can there be when there is</li> </ul>

	no specific test to be applied to this term. In fact, their locations are in some cases in the least accessible areas of the Black Country.
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Neighbourhood Growth Areas are crucial to the delivery of the Strategy, providing the opportunity to deliver a wider range of housing types to meet the area's identified needs. The Policy and supporting text should provide greater justification to the benefits of bringing forward these opportunities.</li> <li>• The size threshold for Neighbourhood Growth Areas should be reduced to 200 homes to reflect the ability of sites to well designed, reflect the local vernacular and allow for appropriate open space and ecological enhancement.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• The Neighbourhood Growth Areas should be provided with all necessary services and functions including affordable housing. Each should have a clear masterplan, requiring a distinctive style with clear design standards and maintenance requirements for open space and canal towpaths etc.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Additional land should be provided in sustainable locations on the edge of the urban area to meet the growth requirement.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Encourage the Authorities to add a reference to uses for sport and recreation within part 1e) of the policy as this would be consistent with the definition of Main town centre uses within the NPPF.</li> <li>• The Authorities should add a reference to uses for sport and recreation within part 1e) of the policy as this would be consistent with the definition of Main town centre uses within the NPPF. Part 1g) of the policy should add a reference to sport and recreation as the green belt is an important location for sports pitches across the Black Country area.</li> <li>• Sub para e) and g) paragraph 3.49 should recognise that some of the impacts or opportunities may cross administrative boundaries.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Support CPS3 (g) in regard to Green Belt. However, the key role identified in CPS3 of promoting urban renaissance is undermined by the significant number of sites identified in Green Belt</li> </ul>
	<b>Resident</b>

	<ul style="list-style-type: none"> <li>The references to housing market interventions should be reviewed to reflect the need for upgrading for significant swathes of housing stock to meet carbon reduction and climate change requirements.</li> </ul> <p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>Concerns over the deliverability of the scale of development set out in Table 3 including the absence of a discount rate for green belt allocations</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Support that each of the Neighbourhood Growth Areas are master planned together. Reference should be made in this paragraph not only to infrastructure needs but also to green and blue infrastructure provision. Furthermore, the collaborative process for master planning as set out in the paragraph should include reference to relevant natural environment stakeholders such as the Local Nature Partnership.</li> </ul> <p><b>Resident</b></p> <ul style="list-style-type: none"> <li>SHLAA needs to be written in full.</li> </ul>
CSP4 – Achieving well-designed places	<p><b>Residents and Stakeholders</b></p> <ul style="list-style-type: none"> <li>directly link to Policy ENV3 and reference the Nature Recovery Network Strategy</li> <li>reference Sport England's Active Design Guidance</li> <li>Request removal of words '<i>wherever possible</i>' from the policy</li> <li>Policy would benefit from the addition of a line about protecting the significance of heritage.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Suggests section 2 on the use of carbon-based products being minimised is inappropriate and needs clarification.</li> <li>Reference in criterion 5 to the urban environment being designed in a way to encourage people to act in a '<i>civil and responsible manner</i>'. Difficult to see how a development proposal could deliver this specific requirement.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Not clear how aspiration for public open space relates to the assumption that net developable area on brownfield sites will be 80% – other land use requirements will make it impossible to deliver open space as well.</li> <li>Instead of establishing prescriptive design criteria within a strategic policy, an opportunity exists for the principles identified within policy to inform the future development of Local Design Codes for the Black Country.</li> </ul>

	<ul style="list-style-type: none"> <li>• Consider preparing a design guide as part of the BCP that reflects local character and design preferences and provides more specific guidance to developers. The policy requirements should be set out in sufficient detail to determine a planning application without relying on other criteria or guidelines set out in a separate SPD.</li> <li>• Policy should be reviewed against the requirements of the NPPF (July 2021) to ensure that it reflects up to date national policy in relation to matters such as the creation of well- designed and beautiful places, and the contribution of trees to the urban environment.</li> <li>• Paragraph 3.58 of the justification suggests that a contribution towards public art with thresholds for eligible development and the value of contributions will be set out in Local Development Documents. May have an impact upon the viability of schemes alongside other contributions. Justification / requirements for contribution should be set out in the BCP itself.</li> </ul>
CSP5 – Cultural Facilities and the Visitor Economy	<p><b>Residents, Stakeholders and Developers</b></p> <ul style="list-style-type: none"> <li>• It is recommended that this policy is adjusted to specifically note that where cultural and visitor facilities are town centre uses, they will be subject to the sequential test.</li> <li>• Recommended that references to heritage tourism could be made more explicit and that there are opportunities for enhancement of this type of use.</li> <li>• Recognition that public venues produce waste, especially food and related packaging, with a lot of waste being left at festivals and large events. Request consideration is given to designing in litter and waste management at such sites.</li> <li>• Request that security and risk management be included in the consideration of new schemes likely to attract crowds.</li> </ul>
GB1 – The Black Country Green Belt	<p><b>Residents and Stakeholders</b></p> <ul style="list-style-type: none"> <li>• General objections to release of green belt (19% of supply) and greenfield sites for housing across the Black Country because: (1) brownfield / non-green belt sites are available which could be released instead e.g. town centres; renewal of rundown areas; higher density; offices &amp; industrial land; derelict land &amp; buildings; sites in other local authorities; (2) development will cause unacceptable environmental harm e.g. to wildlife, trees, historic</li> <li>• Support for not allocating sites in Halesowen</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• Support for allocation of certain sites</li> <li>• Support that BCP has demonstrated exceptional circumstances exist to release land in the Green Belt</li> </ul>
	<p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>• Query over whether land in the Green Belt will be safeguarded for future development</li> </ul>
	<p><b>Member of Parliament</b></p> <ul style="list-style-type: none"> <li>• Query over who owns the land and increase in value of the land</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• How is the plan providing a positive strategy for the historic environment and protecting areas of significant historic landscape character?</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• More clarity needed on what GB mitigation entails.</li> <li>• Greater clarity in the policy as it refers to the Green Belt but also to the sites removed from the Green Belt</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• Allocating sites in the GB for release impacts on Urban Sprawl</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• The policy should include reference to that some of the impacts or opportunities may cross administrative boundaries.</li> </ul>
	<p><b>Developers and Landowners</b></p> <ul style="list-style-type: none"> <li>• The introduction of a caveat is necessary, to stipulate that whilst the general principle that inappropriate development in the Green Belt will be resisted, this would not be the case where Very Special Circumstances exist for Policy GB1, similar wording should be added to point '3'. Clarity on National Policy requirements in this regard is important to guide decision makers in applying the policy.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Policy GB1 - The Black Country Green Belt. The policy wording omits to reference that certain forms of development are not inappropriate development provided they preserve its openness and does not conflict with the purposes of including land within it. The green belt is an important asset for outdoor sport and recreation uses with several playing pitch sites being located within the Black Country Green Belt. Sport England considers that it would be entirely appropriate to expand the wording of the policy to reference such changes of use for outdoor sport and recreation, which would be entirely consistent with the guidance contained in para 150 of the NPPF.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• The policy states that the design of developments on sites removed from the Green Belt will include physical features that define the new Green Belt boundary in a readily recognisable and permanent way.</li> </ul>

	<ul style="list-style-type: none"> <li>• Whilst the principle of this is understood, the Policy should also refer to the reinforcement of existing boundaries as some sites are likely to already have existing clearly defined boundaries where the provision of new boundaries would be inappropriate.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• A point should be added to the policy that directly references the statement made in Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain that all development shall deliver the Local Nature Recovery Network Strategy, and that these will take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• A paragraph should be added that highlights the Draft Local Nature Recovery Opportunity Map (Appendix 18 of the BCP).</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Woodland planting should be removed and replaced with habitat creation appropriate to the location as defined in the Draft Black Country Local Nature Recovery Strategy (WTBBC and EcoRecord 2021)</li> </ul> <p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• Very special circumstances to outweigh inappropriate development?</li> </ul>
GB2 – Extensions and Replacement Buildings in the Green Belt	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• Design of additions to buildings in the green belt to avoid greater impact and harm to the openness of the Green Belt?</li> <li>• Para 3.78 BCA needs to be written in full</li> </ul>



<b>4) Infrastructure and Delivery</b>			
<b>Policy, site allocation or main heading</b>	<b>Number in Support</b>	<b>Number Objecting</b>	<b>Number commenting</b>
Supporting text	1	22	52
Policy DEL1 – Infrastructure Provision	7	17	59
Policy DEL2 – Balance between Employment Land and Housing	1	4	5
Policy DEL3 -Promotion of Fibre to the Premises and 5g Networks	4	6	10

<b>Policy, Proposal or Main Heading</b>	<b>Key Issues Raised by the Representations (type of respondents which raised these issues highlighted in bold)</b>
Infrastructure and Delivery Introduction	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• Accessible high-quality greenspace is important to local communities, as demonstrated in lockdown and in scientific research. Investment is required to ensure this, and so public open space should be included in the list of infrastructure investment that will be required to support development.</li> <li>• Public open space is not necessarily the same as high-quality natural greenspace and therefore the latter should be added to the list of infrastructure investment that will be required to support development.</li> <li>• Sites should be released in phases to prevent the potentially unnecessary destruction of greenfield sites through developers choosing to develop the easy and cheaper sites first and leaving appropriate urban sites undeveloped.</li> <li>• Provision of education/school numbers/available admission places</li> <li>• Impact on the local highway network and congestion</li> <li>• Impact on GPs and Health Care facilities/ capacity including dentists and the emergency services.</li> <li>• Gas pipes and utilities infrastructure are old and at capacity. There are often have maintenance issues requiring road works and resulting in congestion.</li> <li>• Ensure new developments provide access to local shops, schools, medical facilities, dentists, social clubs and local public transport in order to reduce the need to travel by car.</li> </ul>

	<ul style="list-style-type: none"> <li>• Additional infrastructure work required to support growth, including how growth needs can be met in neighbouring authorities.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Recognise the importance of providing an appropriate mix and amount of affordable housing as part of meeting BCA's identified housing needs, and in particular recognise the significance of meeting the housing needs of specific groups within society in accordance with NPPF paragraph 61.</li> <li>• Supports BCA's differentiated approach, however it is noted that the proposed percentages are in excess of the recommendations of the Black Country Viability and Delivery Study. Further clarification on this is requested.</li> <li>• In accordance with paragraph 16(d) of NPPF 2021, policies should be unambiguous and clearly written, so it is evident how a decision maker should react to development proposals. It is considered that the type and tenure of affordable housing sought is ambiguous: BCA should provide further clarification of its requirements which should be justified by supporting evidence.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Current supply – 10% discount on existing allocations - representations from developers questioning the deliverability of existing allocations in AAPs and from the Strategic Centres. It is considered there is limited evidence of developer involvement or justification/explanation that the allocations were sound, developable or deliverable</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• With regards to water supply, whilst future demands would be slightly higher than what is in current plans, Severn Trent do not have concerns regarding water resources</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Fully support the plans statements on the need for and integrated and sustainable transport network that seeks to encourage modal shift to public transport and active travel. However, National Highways is unable to comment on the level of housing and employment growth and whether this can be accommodated on the Strategic Road Network (SRN). National Highways consider the transport assessment should have informed the draft Black Country Plan, and without it the Plan in its current form is unsound. Provision of the transport modelling work would enable a robust assessment of the proposals to be identified to ensure that the proposed levels of growth can be accommodated on the SRN and LRN. As well as identifying what the transport infrastructure needs, and requirements are to enable the proposed levels of growth to be sustainably accommodated and delivered.</li> </ul>
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	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Would be supportive of heritage being included within this list and seeking opportunities to better reveal the significance of heritage assets and enhancement opportunities/addressing heritage at risk.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.10 suggests that new development on sites removed from the Green Belt will require careful consideration in terms of sustainability and that transport improvements may be required on and off site. This phrasing is questionable bearing in mind that the Strategic Allocations identified as NGAs are located immediately adjacent to the urban edge of the conurbation and therefore benefit from proximity to many of the services and facilities that the existing residential areas already have access to. In addition, whilst the land identified as NGAs may necessitate transport improvements to offset the impact of the development proposals, it does not follow that they are necessarily unsustainable from a transport perspective as is suggested in paragraph 4.10.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.21 refers to the financial viability that has impacted on the extent of planning obligations that can be secured in the Black Country. It states that greenfield sites and most brownfield sites will be able to sustain the full range of planning obligations required, as evidenced by the Viability and Delivery Study. However, this is clearly dependent on the sites' specific obligations that can come forward relative to each particular proposal.</li> <li>• Should an individual allocation be identified as having a particular impact requiring mitigation, such as a significant upgrade to a major road junction, this will inhibit the ability to sustain the full range of planning obligations.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• object to the term brownfield-first being used in the BCP. This suggests all land previously occupied by a permanent structure is low value with regards ecosystem services. In the Black Country many sites of high aesthetic, wildlife or health and wellbeing value are post-industrial or have been previously occupied by a structure. The NPPF is clear in its definition of previously developed land that this excludes sites 'where the remains of the permanent structure or fixed surface structure have blended into the landscape'. This term is widely understood and should be used in place of brownfield throughout the BCP</li> </ul>

	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• Prevent 'cherry picking' of greenfield sites by releasing urban sites first.</li> <li>• Clarification required on the extent to which brownfield first approach has been put in place as part of the BCP.</li> </ul> <p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• The plan needs to take account of changing working practices because of the pandemic.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Paragraph 4.4 - Financial viability evidenced in the Viability and Delivery Study is not sufficient to state that there won't be mitigation which could inhibit the ability to sustain the full range of planning obligations.</li> </ul>
DEL1 – Infrastructure Provision	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• General support for the policy and approach towards infrastructure planning. Developers and land promoters would like to be included as part of any future consultation on the Infrastructure Delivery Plan. This should support the emerging Black Country Plan through Examination</li> </ul> <p><b>Residents and Local Councillors</b></p> <ul style="list-style-type: none"> <li>• Concern regarding limited infrastructure planning and transport modelling to inform the Draft Plan.</li> <li>• Concerns regarding the extent to which developers will fund additional infrastructure. Will developers address the impact of the development and are the infrastructure requirements deliverable/financially viable? For example, they are unlikely to agree to fund expensive transport improvements such as new roads near proposed developments and not obliged to fund new health facilities.</li> </ul> <p><b>Site Promoters</b></p> <ul style="list-style-type: none"> <li>• Support for the draft Plan's assertion that allocated sites on the fringe of the urban area, which have been removed from the Green Belt, will be easier and quicker to deliver than sites within the urban area. Strongly agree that all new development should provide the necessary on and off-site infrastructure to support or mitigate the proposals. This draft policy reflects the requirement of paragraph 20 of the NPPF in this respect. Support for policy and additional delivery evidence to be provided. Strongly support the approach to address infrastructure requirements for proposed urban extensions and to review the needs of each area based on its size and location.</li> </ul>

	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• The infrastructure provisions of DEL1 should match that outlined in paragraph 57 of the NPPF. Paragraph 57 of the NPPF makes clear the tests which must be met to deliver lawful planning obligations. Policy DEL1 should be revised to identify these key tests set out in national policy to ensure all obligations required by DEL1 are properly justified. In addition, Criteria 4 and 5 refer to viability assessments. These should also reflect paragraph 58 of NPPF which sets out national policy in regard to these matters and that particular circumstances can justify the need for a viability assessment at the application stage.</li> <li>• No evidence has been provided to demonstrate that a site-specific viability assessment should only be submitted in exceptional circumstances. The policy does not offer any support for proposals that can address barriers caused by inadequate infrastructure.</li> <li>• Representations object to Part 3 of Policy DEL1. Whilst the need to bring forward sufficient infrastructure to support new development is recognised, the proposed approach set out in the policy is considered to be flawed as it fails to clearly identify what the infrastructure requirements will be to deliver and fund the allocations. It is considered deferment is contrary to the NPPF and that all of the infrastructure and the associated costs need to be provided in the BCP at this stage. This is the only way to provide certainty on what is required and for the requirements to be tested through the viability evidence accompanying the plan to be deliverable and in accordance with the NPPF. It is noted that a key requirement of the Framework is that growth and infrastructure are aligned, this is not considered to be the case. We are concerned that the CIL and any required financial contributions in combination could lead to developments being unviable. The Infrastructure Funding Statement should ensure there is no double counting.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• Support Policy DEL1, TRAN1 and TRAN3 but there may be some minor amendments that may be beneficial in positively supporting the delivery of planned growth</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Deliverability of plan allocations. The Councils need to be cautious with their approach to viability given the scale of brownfield land in the proposed supply. The draft BCP is highly dependent upon development in the existing built-up area (40,117 dwellings) and brownfield sites (81%). The Black Country's Viability &amp; Delivery Study (September 2021) confirms that 65% of urban typologies tested are marginally viable (27%) or unviable (38%). The Councils must grapple with this matter as part of the plan and in identifying its proposed supply.</li> </ul>
	<p><b>Resident</b></p>

	<ul style="list-style-type: none"> <li>• Comment received regarding legislation to require summer tyres to be replaced with all season/all year or stud-less winter tyres during the winter months. Allow more tyre retailers to introduce “Tyre Hotel &amp; Swap” services to prevent road infrastructure from closing down.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Policy DEL1 states that the BCAs will set out in Development Plan Documents, Infrastructure Delivery Plans, Supplementary Planning Documents, and where appropriate, masterplans what infrastructure will be provided, how it will be prioritised and what funding sources will be used. The Canal and Rivers Trust looks forward to working with the Black Country Authorities on this to ensure that the potential of our waterways to support sustainable development is unlocked, including through towpath upgrades, access improvements and wayfinding, as is supported by policies TRAN5 and ENV7 in the plan. We suggest that the Black Country Canals Strategy may identify priority areas for investment, which could be fed into infrastructure delivery plans or other relevant documents.</li> <li>• Para 4.24 of the plan includes an 'open' list of the types of infrastructure that may need to be funded to support development. We suggest that 'sustainable travel' and 'green and blue infrastructure' are added to this list in the interests of internal consistency within the plan</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• This policy should be updated to include reference to Environment Agency Flood Risk Management schemes. These are schemes which are likely to benefit local development and contributions should be sought from developers to facilitate the delivery of these schemes to ensure that the development is sustainable and contributes to the wider area. Please see Appendix 2 for details of Environment Agency schemes in development in the area</li> </ul>
	<p><b>Stakeholder</b></p> <p>Supported the inclusion in the Viability and Delivery Study of an indicative contribution towards the funding gap in Police infrastructure arising from the need for additional services arising directly from the proposed scale of growth.</p> <ul style="list-style-type: none"> <li>• Objected to the failure of the Councils to carry this need for financial contributions in the form of CIL/S106 forward into the policy or Justification text of the BCP. Further engagement with the Black Country authorities is requested to ensure that the plan addresses the need for sustainable safe developments supported by essential infrastructure (including policing services and infrastructure)</li> <li>• Amendments to paragraph 4.24 to include reference to policing infrastructure have also been suggested so that the paragraph states “There will also be locally specified requirements, such as crime prevention measures and, where viable in the medium to higher value zones, a requirement for financial contributions (an amount per dwelling) towards Police infrastructure.”</li> </ul>

### **Home Builders Federation**

- Viability assessment should not be conducted on the margins of viability especially in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. Without a robust approach to viability assessment, the BCP will be unsound, land will be withheld from the market and housing delivery targets will not be achieved.
- Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact. The HBF have submitted specific comments on assumptions for compliance with BCP's policy requirements.
- Under Policy HOU3, 25% of affordable housing provision is assumed as First Homes (at 30% less than market value). For the remaining 75% affordable housing provision, the following tenures are assumed in Wolverhampton, Sandwell and Dudley 100% affordable rent and in Walsall 45% social rent / 30% affordable rent. There is a concern that the full impacts of First Homes on viability have not been considered. There will be an increased cost to developers selling First Homes in terms of marketing plus an increased risk as they will not be able to sell First Homes in bulk to a Registered Provider thus obtaining a more reliable up front revenue stream. This increased risk is not reflected in the 6% profit on value assumed for affordable housing because there is no longer a guaranteed, known end value (see para 6.58). Furthermore, First Homes may impact on the ability of developers to sell similarly sized open market units. First Homes may dampen the appetite of first-time buyers for 1, 2 & 3 bedroomed open market dwellings as some households, which would have opted to purchase a home on the open market will use the discounted First Homes route instead. This may result in slow sales of similar open market units, increased sales risk and additional planning costs (if sites have to be re-planned with an alternative housing mix).
- For Policy HOU3, an extra-over cost allowance of only £521 per dwelling for M4(2) and £10,307 per dwelling for M4(3) based on DCLG Housing Standards Review, Final Implementation Impact Assessment, March 2015 is assumed. It is noted that Table 45 of the Impact Assessment shows that £521 per dwelling is based on 3 bed semidetached house, the costs for apartments are higher (£907 - £940 per dwelling). £521 per dwelling is also based on 2015 costs, which are somewhat out of date and less than alternative estimates. The Government's consultation "Raising Accessibility Standards for New Homes" (ended on 1st December 2020) estimates the additional cost per new dwelling, which would not already meet M4(2), is approximately £1,400. During the Government's Housing Standards Review, EC Harris estimated the cost impact of M4(3) per dwelling as £7,607 - £8,048 for apartments and £9,754 - £23,052 for houses (Table 45). M4(2) and M4(3) compliant dwellings are also larger than NDSS (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013), therefore larger sizes should be used when

calculating additional build costs for M4(2) / M4(3) and any other input based on square meterage except sales values, which are unlikely to generate additional value for enlarged sizes.

- The Viability & Delivery Study fails to consider the impacts of the provision of self & custom build plots on sites of more than 100 dwellings proposed in Policy HOU3, which will have a bearing on the development economics of these schemes. It is unlikely that up front site promotion costs (including planning & acquisition costs) and fixed site externals, site overheads and enabling infrastructure costs will be recouped because the plot price a self & custom builder is able to pay may be constrained by much higher build costs for self-builders. There are also impacts of not recouping profit otherwise obtainable if the dwelling was built and sold on the open market by the site developer, disruption caused by building unsold plots out of sequence from the build programme of the wider site and a worst-case scenario of unsold plots remaining undeveloped.
- A cost of Fibre to the Premise (FTTP) is included in the external works allowance. However, if Policy DEL3 requires provision above Part R of the Building Regulations, an extra-over cost allowance should be added.
- To comply with Policy TRAN8, the Viability & Delivery Study includes £800 per unit for EVCP (and £5,000 for a multi-charging point for every 4 x flats) based on an average cost from the Wolverhampton Report. However, this cost is below the Government's cost estimate and excludes any costs for upgrading local networks. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £1,000 per EVCP plus an automatic levy for upgrading networks capped at £3,600.
- If Building for a Healthy Life is introduced as a mandatory requirement of Policy ENV9, then any viability implications should be assessed. The BCA cannot assume that there are no additional costs as the creation of place in terms of local character and site context may involve specific elevational treatments / materials.
- Policy ENV9 NDSS requirements have been applied (see Table 6.4 - Floorspace Assumptions) but there is no assessment of the impact on affordability. The BCA should assess any potential adverse impacts on meeting demand for first-time buyer open market products and other affordable homeownership products such as First Homes. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. An adverse impact on the affordability may translate into reduced or slower delivery rates.
- An extra-over allowance of £10 per unit based on Department of Communities and Local Government Housing Standards Review Cost Impact, September 2014 by EC Harris is included for optional water efficiency standard under Policy ENV9. However, this figure is somewhat dated and should be increased to reflect 2021 prices.



	<ul style="list-style-type: none"> <li>• Under BCP ENV3, 10% Net Biodiversity Gain is costed at £1,003 per unit for greenfield development and £268 per unit for brownfield development based upon the West Midlands regional cost (central estimate) in the Net Gain Delivery Cost Tables 16 &amp; 17 in the DEFRA Biodiversity Net Gain &amp; Local Nature Recovery Strategies Impact Assessment 15/10/2019. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery. For example, costs increase significantly for off-site delivery under Scenario C. There may also be an impact on the ratio of gross to net site acreage.</li> <li>• For compliance with Policy CC2, the Viability &amp; Delivery Study incorporates Option 1 (20% improvement on 2013 Part L Building Regulations) of £2,557 per unit from the Future Homes Standard 2019 Consultation on changes to Part L (conservation of fuel and power) &amp; Part F (ventilation) of the Building Regulations for new dwellings: Impact Assessment. However, the Government’s response confirms that the Interim Part L Uplift 2021 will be Option 2 (31% improvement on 2013 Part L Building Regulations), which was estimated at a higher cost of £4,615 per unit.</li> <li>• Under Policy CC7 it is intimated that a cost of £4,615 per unit is included for carbon reduction / Future Homes Standard, which is the cost of Option 2 Part L Interim Uplift 2021. The cost of Future Homes Standard 2025 will be much higher and further extra-over costs should be included. Furthermore, the Viability &amp; Delivery Study excludes any additional costs associated with compulsory connections to heat networks.</li> <li>• Before the pre-submission BCP consultation, further viability work should be undertaken to address concerns raised about the afore-mentioned assumptions. Most sites should be deliverable at planning application stage without further viability assessment negotiations. Viability negotiations should occur occasionally rather than routinely. Trade-offs between policy requirements, affordable housing and infrastructure provision should not be necessary. However, if the viability of sites is overstated, policy requirements will be set at unrealistic levels. Landowners and developers will have to submit site-specific assessments to challenge assumptions in the Black Country</li> <li>• Viability &amp; Delivery Study. Such negotiations at planning application stage causes uncertainty for both the BCA and developers, which may result in significant delay to housing delivery or even non-delivery.</li> </ul>
Policy DEL2 – Balance between Employment Land and Housing	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• DEL2 should be seeking to protect existing employment sites. Rather than compromising its employment land supply further, the plan should be seeking to maximise locations for development outside of the urban area and increasing the number of homes allocated on sites currently in the Green Belt.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Include reference to ENV1 in para-4.30.</li> </ul>

	<ul style="list-style-type: none"> <li>• Support for DEL2 as it sets out how development on brownfield sites will be judged. However, the policy should be more positive in its approach to brownfield development. There is considerable scope for further brownfield land to come forward and there is likely to be on-going change and regeneration both in the Black Country centres and in areas of renewal. The Plan needs to support this on-going change, not only to protect the countryside from incursion but to allow for renewal and to ensure the Black Country remains an attractive area to invest in.</li> <li>• It is vital that all new development provides appropriate access to services and opportunities for training, apprenticeships and local jobs, especially for those most vulnerable and those living in deprived deciles within the indices of multiple deprivation. The WM LTP Green Paper has also outlined the benefits of closer links between transport and land use planning – in order to help create places in which people’s daily needs can be met within a short walk, cycle or by public transport.</li> </ul>
DEL3 – Fibre to the Premises	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• Planning requirements should not be imposed beyond Building Regulations. The Government plans to amend Part R to oblige developers to work with network operators to install gigabit broadband within a commercial cost cap, therefore the policy is not necessary.</li> <li>• The policy should be amended to reflect the fact that developers can facilitate delivery but cannot ensure provision through third parties.</li> <li>• It is not clear how costs have been taken into account in the Viability and Delivery Study.</li> </ul>
	<p><b>Stakeholders</b></p> <ul style="list-style-type: none"> <li>• Suggest minor changes to reflect: value of digital services for transport; opportunities for canals to route infrastructure; and the need to protect heritage assets.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Mast location should take into account unsightly appearance and health impacts.</li> </ul>

5) Health and Wellbeing			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
Health and Wellbeing General	7	0	5
HW1 – Health and Wellbeing	6	4	15
HW2 – Healthcare Infrastructure	3	7	5
HW3 – Health Impact Assessments (HIA's)	1	4	5

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(type of respondents which raised these issues highlighted in bold)</i>
Health and Wellbeing – General	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Supportive of the Local Plan's aspirations for health and wellbeing and identifying opportunities through new development to support the creation of strong, vibrant and healthy communities. Health and wellbeing are core to the social objective of sustainable development as defined by the NPPF (paragraph 8).</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>public access/closeness to wildlife rich green spaces and green infrastructure from their doorstep out into a widening landscape, where biodiversity can thrive alongside nature-based solutions such as flood mitigation and, carbon storage, all contribute to mental and physical wellbeing. For example, through the Midland Heath Heartland partnership - Purple Horizons Nature Recovery Project (see Annex 1 for more details). This project aims to create, enhance and connect up fragmented heathland habitat and other wildlife-rich habitats between Cannock Chase and Sutton Park, which will benefit local communities in escaping the urban environment to 'recharge their internal resilience through nature'. The health and wellbeing of people living in a very urban environment will be compromised if the Core Habitat Zones (Ref. Natural Capital Mapping 2021-contact Natural England for further detail) within the greenbelt area are not assessed fully to accommodate these opportunities.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>welcome the recognition that the built and natural environments are key determinants of health and wellbeing.</li> </ul>
	<p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>IM Land support the BCP’s aspirations for supporting health and wellbeing and identifying opportunities through new development to support the creation of strong, vibrant and healthy communities and will welcome the publication of evidence to substantiate health and wellbeing infrastructure requirements.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>a paragraph should be added that further describes the importance of the natural environment in determining health and wellbeing. The value of accessible, high-quality natural greenspace to local communities is increasingly understood. For example, the Dasgupta Review 2021 states that access to green spaces can reduce socio-economic inequalities in health and cites a longitudinal study covering over 10,000 UK residents that found that living in greener urban space was associated with greater life satisfaction (White et al. 2013).</li> <li>Figure 3 - Determinants of health and wellbeing (Barton and Grant, 2010)</li> <li>Support the inclusion of the determinants of health and wellbeing map and the recognition in the BCP of the importance of the natural environment in determining health and wellbeing outcomes.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Under these policies, we would welcome reference to TfWM’s Health and Transport Strategy and its supporting evidence, along with more emphasis on how improved sustainable transport links can deliver on improvements to people’s health outcomes. For example, through reducing health inequalities, cleaner air, increased active travel levels, safer roads, reduced noise pollution and improved levels of social cohesion. These issues are not currently picked up under this policy but are vital to health outcomes.</li> </ul> <p><b>MP</b></p> <ul style="list-style-type: none"> <li>Whilst I fully recognise the need for more housing across the Black Country, I also believe that the health and wellbeing of the local population is important, with the protection of green belt space a key component in that. I am pleased that the BCP takes into account the Sustainability &amp; Transformation Partnership that has been agreed by the local planning and health authorities and recognises that both the built and natural environment can have an impact on health provision.</li> </ul>
HW1 – Health and Wellbeing	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Draft Policy HW1 (Health and Wellbeing) provides a strategic context for how health and wellbeing is influenced by planning. We are supportive of this draft policy, particularly as it aligns with the requirements of NPPF Paragraph 92 as it aims to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles to address identified local health and wellbeing needs.</li> </ul> <p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>As discussed in response to Policy DEL1, it is important that policies within the BCP do not compromise the viability and deliverability of new developments, particularly in respect of the need for and delivery of onsite infrastructure. To ensure HW1 takes a consistent approach to viability with other policies in the plan, part j. of the policy would benefit from cross referencing draft policy DEL1 which sets out the tests for viability.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>The parts that follow (parts a) to k)) are lengthy, unwieldy, and do little more than direct the reader to other policies in the plan. A number of those other policies are themselves very lengthy. Compliance with these (as all) policies is to be expected and would lead to a positive outcome from a health and wellbeing perspective.</li> <li>To remedy this, parts a) to k) of Policy HW1 should be deleted</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>5.1 Draft Policy HW1 (Health and Wellbeing) provides a strategic context for how health and wellbeing are influenced by planning and provides links to other policies in the Black Country Plan. We agree this strategic policy is important in order to support strong, vibrant and healthy communities with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being and the 'social' objective of sustainable development. It also reflects chapter 8 of the NPPF.</li> <li>Part C of draft Policy HW1 requires that new developments, where relevant, provide a range of housing types and tenures that meet the needs of all sectors of the population including for older people and those with disabilities requiring varying degrees of care; extended families; low income households; and those seeking to self-build as set out in Policies HOU2 and HOU3. Part F refers to the provision of a range of quality employment opportunities for all skillsets and abilities along with the education and training facilities to enable residents to fulfil their potential and support initiatives to promote local employment and procurement during construction as set out in Policies HOU5, EMP2, EMP3 and EMP5. Whilst we agree that all of the requirements a-k are important to improving local health and wellbeing, we consider that the provision of a mix of housing and access to employment to be particularly important and agree they will form a key part in improving the wider social, economic and environmental circumstances that determine land. This highlights</li> </ul>

	<p>why the provision of land locally to meet current and future housing and employment needs, is particularly important to local people.</p>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Policy HW1 states that the regeneration and transformation of the Black Country will protect and improve the health and wellbeing of its residents and reduce health inequalities. It then sets out a number of criteria which will assist in this objective (where relevant), and it includes providing a range of housing types and tenures that meet the needs of all sectors of the population. It includes delivery of employment opportunities and social infrastructure including sport and recreation facilities. To do this new green and blue infrastructure will be provided and this could include allotments and gardens. Taylor Wimpey supports these objectives, although it should be made abundantly clear that not all of the criteria listed are relevant to every proposal.</li> <li>• 6.2 In addition, it should be recognised that some of the NGAs provide the opportunity to make a significant difference in regard to provision of both green and blue infrastructure and this would be available not only to new residents within the development but also existing residents in areas where there may be little alternative existing provision. This represents a significant benefit of such development and could be identified in Policy HW1 or its supporting text. Similarly, it could also be referenced within the specific policies dealing with the NGAs</li> <li>• Policy HW1 is generally supported. However, it is considered that the aim of achieving “affordable warmth” in part (d) of the policy is vague and it is not clear what developers would need to do to meet this requirement. The policy as drafted conflicts with the Framework 16 (d) as it is not evident how a decision maker should react to development proposals.</li> <li>• It is therefore considered that the text “and achieve affordable warmth” should be deleted from the policy.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Draft Policy HW1 (Health and Wellbeing) provides a strategic context for how health and wellbeing is influenced by planning. We are supportive of this draft policy, particularly as it aligns with the requirements of NPPF Paragraph 92 as it aims to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles to address identified local health and wellbeing needs.</li> <li>• Part C of Draft Policy HW1 advises that new developments that provide a range of housing types and tenures that meet the needs of all sectors of the population, including for older people and those with disabilities requiring varying degrees of care; extended families; low-income households; and those seeking to self-build,</li> </ul>

	<p>will create an environment that protects and improves the physical, social and mental health and wellbeing of its residents, and reduces health inequalities</p>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>We support the HW1 policy which outlines the requirement for new development to ensure access by inclusive, active, and environmentally sustainable form of travel and through promoting road safety and managing the negative effects of road traffic and look forward to working with the authorities to facilitate such travel where interface with the SRN occurs. National Highways is committed to continue to work with the Black Country authorities in a collaborative and constructive manner to support the progression of the Black Country Plan. As part of this approach, we will work with you to develop a greater understanding of the impact of development allocated within the draft plan on the SRN. We trust that the above is useful in the progression of the Black Country Plan and welcome continued discussions with the Council to this end.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>I welcome the recognition in the policy of the importance of protecting, enhancing, and providing new green and blue infrastructure in creating an environment that protects and improves the physical, social and mental health and wellbeing of its residents, employees and visitors. This should be a standalone point that expands upon this, rather than green and blue infrastructure being combined with sports facilities, play and recreation opportunities.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>we welcome the references throughout this policy to encouraging active lifestyles through Active Design and creating Active Environments. In particular we support: * In 1a) the reference to creating inclusive, safe environments that foster a strong sense of place and encourage social interaction for all; * In 1b) the reference to enabling active and healthy lifestyles, through measures to improve active travel opportunities for all; * In 1g) the reference to protecting social infrastructure including sport and recreation. We would recommend a minor modification to the wording to refer to 'protect, enhance and provide' a range of social infrastructure as this would capture a broader range of development opportunities, and also to make an amendment to refer to 'indoor sport and recreation facilities' in part 1g) since outdoor sport and recreation is addressed in part 1h). Part 1g) should cross-refer to the relevant social infrastructure policies including ENV8. * In 1h) the reference to sports facilities should be refined to 'outdoor sports facilities including playing fields' since indoor sports facilities is addressed in 1g). * In 1i) the reference to the importance of allotments and gardens for physical and mental well-being. Since the policy makes strong references to Active Design and Active Environments principles it would be entirely appropriate and recommended by Sport England to reference Sport England's Active Design Guidance within the associated justification and evidence.</li> </ul>

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

**Stakeholder**

- We welcome this policy direction, specifically in reference to environmentally sustainable travel, energy efficiency, climate change, water and air quality, green and blue infrastructure.
- The natural environment affords the best 'natural' play opportunities for children while offering multi- functional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales) that have proven health and wellbeing value.
- Evidence for nature play and health: Play, naturally: a review of children's natural play. Nature for health and wellbeing | The Wildlife Trusts. Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

**Resident**

- Green and blue infrastructure are different to and separate from sports facilities and play and recreation opportunities and should be included as a stand-alone point.
- The term green space is ambiguous: this could be more explicitly written as high quality natural greenspace.

**Developer**

- We welcome the Council's commitment to the health and wellbeing of its residents. As detailed in our representation to Policy HOU 2 the demographic profile of the Black Country is ageing with the SHMA identifying a requirement for 4,907 additional units of sheltered housing and 604 units of extra care accommodation by 2039.
- An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently.
- Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.



	<ul style="list-style-type: none"> <li>The respondents commend the Council for recognizing the key role that specialist older persons' housing plays in the health and wellbeing of the Black Country within sub-clause c) of this Policy. We are however concerned that the housing needs of the elderly are not considered within the housing policies which is addressed in our representations to Policy HOU2.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>it is appropriate for the Health and Wellbeing Introduction to state that the Black Country authorities have the 'key objective' of, '...Ensuring a healthy and safe environment that contributes to people's health and wellbeing...' (paragraph 5.3). Reducing crime, anti-social behaviour and the fear of crime are fundamental to creating a safe environment which will contribute towards people's health and well-being.</li> <li>welcomes the wording of Policy HW1 paragraph a. which requires where relevant, for all new development to be 'inclusive, safe, and attractive, with a strong sense of place; encourage social interaction; and provide for all age groups and abilities as set out in Policies CSP4, ENV5, ENV6, ENV8 and ENV9.' whilst also promoting road safety.</li> </ul>
	<p><b>Resident Group</b></p> <ul style="list-style-type: none"> <li>We do not believe it a good idea to create concentrations of poverty for health, educational, social cohesion and sustainability reasons. It is important that proposed ratios for such accommodation are reviewed on a community by community, rather than an authority or subregional basis. We believe that this should be made clear in the Plan under policy HW1 to reinforce the need for mixed developments. We would urge that community impact statements should be introduced or, at least, incorporated as part of Health Impact statements in HW3,</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>We think that section 5 is particularly important for the future development of the Black Country and the health and happiness of its residents and visitors. We welcome that Geopark, and other Environmental policies so strongly cross referenced here. We concur and support many of the generic statements of paragraphs 5.7 to 5. 13.</li> <li>We would however recommend that para's 5.12, 5.16 and 5.22 also include a specific bullet point/statement that highlights the specific importance of accessible natural and cultural places to wellbeing as these are increasingly being prescribed by health professionals for mitigating poor mental and physical health issues.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>While I support this policy, it is in conflict to the Green Belt policy</li> </ul>
	<p><b>Developer</b></p>

<p>HW2 – Healthcare Infrastructure</p>	<ul style="list-style-type: none"> <li>• Amongst other things it identifies that all residential developments of 10 or more units must be assessed against the capacity of existing healthcare facilities. Where demand generated by residents of the new development would have unacceptable impacts upon the capacity of these facilities, developers would be required to contribute to the provision and improvement of such services.</li> <li>• 6.4 It is the position of Taylor Wimpey that contributions towards both the provision of acute NHS services and services provided by the CCG are not, as yet universally verified as being compliant with the tests set out in the NPPF for lawful planning obligations. As such the element of Policy HW2 relating to such contributions should be removed.</li> <li>• 6.5 In addition, Criterion 5 refers to infrastructure contributions being sought on-site or its immediate vicinity. It would be wholly impractical for development of 11 dwellings to deliver infrastructure for healthcare on-site. In addition, it has been proved in a number of locations that where land is set aside to provide for new medical facilities, the delivery of these facilities has proved problematic, and the land becomes surplus. The delivery of specific medical facilities falls outside of the remit for most developers, particularly those engaged in house building. The policy should pay regard to these factors.</li> <li>• 6.6 Whilst supporting paragraph 5.30 highlights that whilst many healthcare infrastructure projects will be delivered from mainstream NHS resources, contributions would also be secured through planning agreements in line with the relevant regulations in operation at the time. As stated above, there is some uncertainty as to whether contributions towards such facilities (NHS CCG services) are in accordance with the current CIL Regulations.</li> <li>• 6.7 The policy and its supporting text refer to the 'sequential test'. It is unclear why the sequential test is being referred to in the context of the delivery of contributions towards healthcare whether it be on-site or off-site. In planning terms, a sequential test either relates to the location of development relative to areas of flood risk or town centres.</li> <li>• 6.8 Paragraph 5.32 refers to the Viability and Delivery Study indicating that, depending on the extent of other planning obligations, contributions towards healthcare provision as required in the policy may not be viable. This contradicts the approach set out in the previous policy DEL1 which states that the Plan has been subject to a viability assessment to ensure policies are deliverable and the supporting text confirms (paragraph 4.21) that greenfield sites will be able to sustain the full range of planning obligations required. As set out above, depending on its site specific S106 requirements, it may well be the case that sites in Plan cannot deliver the full range of planning obligations.</li> </ul>
	<p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>• Draft Policy HW2 sets out the requirements for the provision of health infrastructure to serve the residents of new developments. Part 3 of Draft Policy HW2 emphasises that proposals for major residential developments must be assessed against the capacity of existing healthcare facilities and/or services as set out in local development documents.</li> <li>• We are supportive of this draft policy as it seeks to deliver appropriate local facilities to support residents and to enhance the sustainability of existing areas.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Part 6) of this policy provides that, “The effects of the obligations on the financial viability of development may be a relevant consideration.” This implies that there will be circumstances where viability is not a relevant consideration. That is not the case; it is always relevant, even if only to the extent that it proves a full contribution can be made.</li> <li>• To remedy this, the word “may be” in part 6) of Policy HW2 should be replaced by the word “is”.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Policy HW2 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS’s ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed.</li> <li>• The NPPF is clear in stating that Local Plans should adopt policies that “take into account and support the delivery of local strategies to improve health, social and cultural well -being for all sections of the community”? (Paragraph 93b).??</li> <li>• The policy currently fails to consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.</li> <li>• Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.</li> <li>• With this in mind, we are keen to encourage that a greater level of flexibility be granted to the NHS via modification of the wording of Policy HW2. This will ensure that the NHS can promptly and efficiently respond to the healthcare needs of the residents as they arise.</li> </ul>

	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• just want to know why aren't you doing that already. we can't get doctor appointments now, it's disgraceful yet you keep taking our council tax</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Contributions towards both the provision of acute NHS services and services provided by the CCG are not, as yet universally verified as being compliant with the tests set out in the NPPF for lawful planning obligations."</li> <li>• Criterion 5 refers to infrastructure contributions being sought on-site or its immediate vicinity. It will be wholly impractical for development of 11 dwellings to deliver infrastructure for healthcare on-site."</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Subject to there being an evidenced need, welcomes part 7 of this policy and the requirement for onsite healthcare provision. Indeed, potential provision is already allowed for in the site's illustrative masterplan. To satisfy NPPF paragraph 16 the policy should only refer to an identified requirement, rather than a 'likely requirement', which would render this part of the policy ambiguous.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• supports the reference in part 1d) of this policy to taking opportunities where they arise to co-locate healthcare facilities with facilities for sport to capture opportunities for social prescribing since this can bring about stronger outcomes for physical and mental well-being in line with the plan's objective. A good example of this is Portway Lifestyle Centre in Sandwell (case study link attached below). <a href="https://www.sportengland.org/know-your-audience/case-studies/portway-lifestyle-centre">https://www.sportengland.org/know-your-audience/case-studies/portway-lifestyle-centre</a></li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• The loss of capacity from the closure of many local hospitals is at odds with the exponentially rising population, also the concentration onto super hospitals makes access more difficult and means greater susceptibility to cross infections, and loss of resilience to the overwhelming of a single facility.</li> <li>• With the overbearing need of developing house estates, I worry about the lack of health infrastructures e.g., GP practises, Hospitals and of course the high need for staff that goes with it. New Schools and definitely many more special Schools should be considered into this growing picture of our communities. Worship places, parks and green spaces should be preserved or dedicated to newly build areas, bus services considered, roads state maintained, roads safety thoroughly thought about and implementation of cycle lanes throughout the county.</li> <li>• I also would like to see old derelict buildings being rehabilitated, converted.</li> </ul>

	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>In relation to healthcare infrastructure "there is some uncertainty as to whether contributions towards such facilities are in accordance with the current CIL Regulations."</li> </ul>
<p>HW3 – Health Impact Assessments (HIA's)</p>	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>Health impact is essential to local areas and communities - green land provides the tools to improve healthy lifestyle through exercise - e.g., walking cycling and running, social interactions and mental health. Access to areas should not just include local park or streets - you need fields and woodlands with access to wildlife.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Welcomes the policy aspiration for regeneration of the Black Country to support an environment that protects and improves the physical, social and mental health and wellbeing of its residents, employees and visitors and reduces health inequalities, including by protecting, enhancing and providing new green and blue infrastructure. We believe that the canal network has a significant role to play in this regard, whether it be through offering a place for recreation, a route for sustainable travel or a focal point for community engagement, skills development or volunteering. Research by Simetrica carried out for the Trust has demonstrated the wellbeing benefits of spending time by our waterways. Through protecting and enhancing the quality and accessibility of the canal network, we believe that it can deliver more wellbeing benefits for residents of the Black Country</li> <li>We would hope to see green and blue infrastructure properly considered in Health Impact Assessments required under policy HW3.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>The justification text to Policy HW3 states that policy provides for the individual Black Country authorities to require Health Impact Assessments for development proposals, in line with locally determined criteria, to be set out in local development documents.</li> <li>Part 2 of the policy states that where a development has significant negative impacts on health and wellbeing, the Council may require applicants to provide for mitigation. 10.3 As such impact assessments could be applicable to sites allocated in the BCP and may be needed to inform infrastructure provision on these sites, Taylor Wimpey considers that these criteria should be identified in the BCP rather than local development documents. This is the only way to ensure that the soundness of the policy can be properly tested and assessed through the viability work which accompanies the plan.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>The policy and its supporting text refer to the 'sequential test'. It is unclear why the sequential test is being referred to in the context of the delivery of contributions towards healthcare whether it be on-site or off-site.</li> </ul>

	<ul style="list-style-type: none"> <li>Paragraph 5.32 in relation to viability of healthcare provision contradicts the claims in DEL1 about the sites being tested for viability and able to deliver policy requirements.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Policy HW3 requires development proposals to “demonstrate that they would have an acceptable impact on health and wellbeing through either a Health Impact Assessment (HIA) or Health Impact Assessment Screening Report.” Whilst the intention of that policy requirement is understood, the policy should clearly set out the threshold at which a HIA is required, to ensure consistency between planning applications.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Sport England supports the policy to require HIA's for relevant development proposals in part 1) and the requirement to mitigate negative health impacts in part 2). We support the reference in para 5.34 to applying this to relevant infrastructure for physical activity, recreation and active travel, and would encourage the Authorities to develop further guidance to explain how this policy will be applied in practice.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>This policy stipulates that some development proposals will need to demonstrate how they address any adverse health impacts through the submission of a HIA, although the thresholds for doing so are not defined. HIA should be limited to: <ul style="list-style-type: none"> <li>1) Forms of development that result in acknowledged adverse impacts on health and well-being, such as hot food takeaways, betting shops and payday loan shops, should be required to submit a HIA.</li> <li>2) B) Most of the questions in the Health Urban Planning Checklist which is in our experience the most frequently cited template by Las seeking HIA are only relevant to strategic development proposals and have little relevance to small and mid-sized developments.</li> </ul> </li> <li>We would advocate that the threshold for a HIA should be residential development in excess of 100 unit or forms of development in which there are clear issues of health and well-being, such as hot food takeaways and payday loan shops.</li> <li>Additional clarity on the thresholds for HIA should be provided in the Black Country Strategy. We would request that HIA's are limited to developments with a clear detrimental impact on health and well-being and / or housing development in excess of 100 units.</li> </ul>
	<p><b>Residents Group</b></p> <ul style="list-style-type: none"> <li>We would urge that community impact statements should be introduced or, at least, incorporated as part of Health Impact statements in HW3, and that housing policies should be reviewed to put greater emphasis on balanced communities.</li> </ul>

6) Housing			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
<i>HOU1 – Delivering Sustainable Housing Growth</i>	17	193	95
<i>HOU2 – Housing Density, Type and Accessibility</i>	12	17	44
<i>HOU3 - Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing</i>	5	29	34
<i>HOU4 – Accommodation for Gypsies and Travellers and Travelling Show people</i>	2	4	2
<i>HOU5 – Education Facilities</i>	3	4	24
<i>HOU6 – Houses in Multiple Occupation</i>	4	0	4

Policy, Proposal or Main Heading	Key Issues Raised by the Representations (Type of respondents which raised these issues highlighted in bold)
HOU1 – Delivering Sustainable Housing Growth	<b>Residents and Stakeholder</b> <ul style="list-style-type: none"> <li>Population / household projections underlying Government local housing need figures are not robust for various reasons, significantly over-estimate housing need and should be challenged / not used.</li> </ul>
	<b>Developers, Landowners and Agents</b> <ul style="list-style-type: none"> <li>The Local Housing Need (LHN) set out in Table 2 of the Draft BCP is not as per the HMA 2021 and there should be consideration of an uplift to Government local housing need figures to reflect local and/or regional economic growth ambitions e.g. HS2, and also affordability, given the low amounts of affordable housing likely to be delivered on housing allocations due to majority being brownfield sites with low viability.</li> </ul>
	<b>Residents and Councillors</b> <ul style="list-style-type: none"> <li>The Dudley housing target is higher than local need and should be reduced.</li> </ul>
	<b>Developers, Landowners and Agents</b> <ul style="list-style-type: none"> <li>General support for provision of new housing, including affordable / Council housing, to meet the needs of future generations.</li> </ul>

<ul style="list-style-type: none"> <li>Housing supply is over dependent on sources in the urban area which are likely to under-deliver over the Plan period due to factors such as viability constraints, market limitations and covid impacts -primarily occupied employment land, high density sites in Strategic Centres for which there is no evidence, constrained brownfield land and unrealistic windfall allowances. Release of occupied employment sites for housing is not deliverable and could have a detrimental effect on employment land supply. Increased densities should not be over-ambitious and should be supported by those responsible for housing delivery. Additional green belt release sites should be identified to meet the existing / increased shortfall and deliver more affordable housing, particularly before exporting to other authorities</li> </ul>
<p><b>Stakeholder and Local Authority</b></p> <ul style="list-style-type: none"> <li>There should be an attempt to accommodate the Wolverhampton 35% uplift within the urban area.</li> </ul>
<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>The BCP housing supply does not include any headroom / flexibility, which is required given high dependence on brownfield sites / viability issues identified in the Viability and Delivery Study.</li> </ul>
<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>1,250 homes should be removed from supply for potential further demolitions in Dudley, as only 423 of a potential 2,500 demolitions are accounted for, and the replacement rate is likely to be 50% as set out in the BCCS (52%)</li> </ul>
<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>2,900 homes should be removed from windfall supply, in order to reduce supply from windfalls to 6% of total supply, in line with the statement made by BCCS Inspectors that this is an appropriate level.</li> </ul>
<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>The 5% discount rate for planning permissions should be justified by further up to date local evidence.</li> <li>The 15% discount rate applied to occupied employment land and the 10% discount rate applied to: other commitments; existing allocation in Strategic Centres; and other allocations, are not justified / evidenced and should be higher due to delivery constraints.</li> <li>The Draft BCP housing target of 2,518 homes per annum is less than that delivered in recent years, demonstrating that delivery and demand are not constraints, and so the target should be increased.</li> <li>A substantial discount should be applied to the Strategic Centres uplift figures as sites have not yet been identified and there may not be capacity.</li> </ul>
<p><b>Stakeholder and Local Authority</b></p>



	<ul style="list-style-type: none"> <li>BCP evidence should be revisited to take account of major national changes (Covid, Brexit, home shopping and working) which are likely to have an impact on demand for housing and supply of land for housing over the Plan period. This could include allocation of more sites and/or large windfall allowances on redundant employment, retail and office land, particularly in centres.</li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>More clarity and consistency is required on assumed implementation rates for major sites, in particular sites realistically deliverable within 5 years, and sites with remediation issues and which require external funding. The BCP housing trajectory does not provide an individual trajectory for each site to allow delivery assumptions to be checked. A 5-year housing land supply (5YHLS) statement has not been provided and it has not been clarified if the BCA wish to demonstrate 5YHLS through adoption of the BCP as set out in 2021 NPPF (para 74b).</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>The potential to bring empty homes back into use should be taken account of in housing supply.</li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>A discount / lapse rate should be applied to green belt release sites, as there are examples of sites not delivering as quickly as expected.</li> </ul>
	<p><b>Developers, Landowners and Agents</b></p> <ul style="list-style-type: none"> <li>The Plan gives rise to an unacceptably large housing shortfall and does not adequately explain how this will be met.</li> <li>The GBBCHMA authorities should prepare a joint SoCG as a matter of urgency, to commit to resolving the redistribution of unmet housing needs in full across the HMA. The SoCG should confirm that all authorities will meet their own LHN (except BC and Bham) and what proportion of BC and Bham unmet need will be met by each, including a flexibility allowance.</li> <li>Given the large proportion of local housing need to be exported, the BCP should include guidance on where the BCA would support allocation of sites in emerging Plans. The guidance should support sites close to the edge of the BC with good access to services, and which can deliver all infrastructure on site and come forward promptly, and which can deliver high biodiversity net gain and take advantage of existing landscape features.</li> </ul>
	<p><b>Stakeholders</b></p> <ul style="list-style-type: none"> <li>Not sufficient requirements in the BCP for more energy efficient and better-quality housing</li> </ul>
	<p><b>Developers</b></p>

<p>HOU2 – Housing Density, Type and Accessibility</p>	<ul style="list-style-type: none"> <li>• Agree that a range of types and sizes of homes are needed, and that both densities and accessibility of housing to residential services should be maximised, subject to flexibility on a site-by-site basis and use of the most recent evidence on housing need and viability. In particular, realistic and appropriate housing capacities should be assumed for BCP allocations, in line with local character and constraints.</li> <li>• A range of densities specific to the character of different areas of the BC is necessary.</li> <li>• The density policy should take into account a range of considerations as set out in PPG, including site constraints, character, environmental and infrastructure capacity and market / site viability, and be applied on a site-by-site basis.</li> <li>• The requirement for a mix of home types as set out in Table 5.10 would make 40 dph challenging to achieve.</li> <li>• The capacity of proposed housing allocations has been overestimated, as on-site open space and net biodiversity gain requirements will reduce the net developable area.</li> </ul> <p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• More family homes / lower densities should be provided in the urban area, to meet local needs (including for home working) and to improve design / avoid town cramming. Requiring higher densities could reduce design quality.</li> <li>• New homes should be smaller / less expensive to meet local needs</li> </ul> <p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• The requirement for the National Described Space Standards (NDSS) set out in Policy ENV9 is not necessary or evidenced as required by PPG and would be inflexible in terms of affordability and market choice and make higher densities more challenging to achieve. If NDSS were designed to apply to all housing development, it would have been included in standard Building Regulations. Transitional arrangements should be put in place for NDSS.</li> </ul>
<p>HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build/ Custom Build Housing</p>	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• The policy should provide clear tenure requirements in line with national guidance, specifically regarding 10% affordable home ownership on all 10+ home sites (NPPF para 65) and 25% of all affordable housing secured to be First Homes. Shared ownership should be supported as an affordable home ownership product.</li> <li>• Policy HOU3 affordable housing requirements are above those recommended in the Viability and Delivery Study, are not evidenced and should be reduced or made flexible subject to market conditions. It should be clear that the requirements will only apply where viable.</li> </ul> <p><b>Stakeholders</b></p>

	<ul style="list-style-type: none"> <li>• Policy should require, on larger sites, well dispersed clusters of maximum 10-15 affordable homes, which are visually indistinguishable from other tenures.</li> </ul> <p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• As sites in the urban area will provide limited amounts of affordable housing, more sites should be allocated in the green belt to increase affordable housing provision.</li> <li>• Requirements for wheelchair accessible housing are not based on sufficient evidence; are too high / too onerous; will make development unviable; and will reduce densities by increasing home sizes. If all green belt release and non-employment/Strategic Centre allocations deliver the required 15% of M4(3) housing this would generate 2,196 homes, exceeding identified need of 1,674 homes.</li> <li>• The M4(3) requirement should distinguish between M4(3a) and M4(3b), and the M4(3) requirements should only be for homes over which the BCA has housing nomination rights.</li> <li>• Requirements for self-build/custom build housing are not based on sufficient evidence; are too high / too onerous; will make development unviable; will cause health and safety / phasing issues; and will reduce densities. 12 months is too long, and "appropriate marketing" should be defined.</li> <li>• Self / custom build plots should be provided on small housing allocations with willing landowners or by the BCAs directly, rather than as part of larger developments, where this may cause health and safety, logistical and consistency of design issues. There is no evidence to support the use of a 100-home threshold.</li> <li>• There are few individuals on self-build registers compared to the potential level of supply through HOU3, and those individuals will have specific needs that may not match the sites available and may not have the means to acquire and construct a home.</li> </ul> <p><b>Residents and Local Councillors</b></p> <ul style="list-style-type: none"> <li>• Given there is an identified need for 32.7% of new housing built over the Plan period to be affordable, more affordable housing should be provided by the Plan, and this should be provided in the urban area, rather than development in green belt areas.</li> </ul> <p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• Support for a high proportion of wheelchair accessible homes, accessible design and supported housing.</li> </ul>
HOU4 – Accommodation for Gypsies and Travellers	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• The Policy should require consultation with WM Police and consideration of security, community safety and social inclusion in line with Secured by Design principles.</li> </ul> <p><b>Local Authorities</b></p>

and Travelling Show people	<ul style="list-style-type: none"> <li>Some neighbouring local authorities have a shortfall of gypsy and traveller pitches and have asked if part of their unmet need can be exported to the Black Country.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Request addition to require sites to be located within flood zones 1 and 2 as gypsy and traveller sites are classified as “highly vulnerable” in accordance with PPG: Flood Risk and Coastal Change. Highly vulnerable development is only appropriate in Flood Zone 2 following the exception test.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>No further gypsy sites are needed, and could cause disorder, nuisance, noise, traffic and litter. There is an over-concentration of new sites in Walsall. Gypsy and traveller allocations at Holbeache Lane/Wolverhampton Road and Swindon Road should be removed.</li> </ul>
HOU5 – Education Facilities	<p><b>Stakeholder and Resident</b></p> <ul style="list-style-type: none"> <li>Request revisions to part 5) to support improvements to existing school network and to part 2) to allow contributions to be secured retrospectively where forward funding is necessary. Appropriate timing of delivery should be secured.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Part 4) and delivery section should be amended to refer to securing community use in line with evidence of need, and through a suitably worded community use agreement.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Site allocations should provide details of new schools required, supported by viability assessment which assumes developers will provide both land and funding, whilst also retaining flexibility. Infrastructure Funding Statement should be prepared to establish funding from CIL/ S106, prioritising S106 as it provides clarity and transparency.</li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>More evidence / detail should be provided on education requirements for specific sites and on the justification for education costs used in the Viability and Delivery Study, including on Key Large Sites.</li> <li>It should be recognised that delivery of education facilities is outside the remit of developers and relies on the LEA or free schools.</li> </ul>
	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>There should be more investment in schools and developments should be supported by enough school places, provided in a timely manner, and with sufficient funding.</li> </ul>

	<ul style="list-style-type: none"> <li>Existing schools are full / under pressure therefore new housing developments will force existing residents to travel further to good schools, causing environmental damage / congestion.</li> </ul>
HOU6 – Houses in Multiple Occupation	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Policy should only allow conversion to Houses in Multiple Occupation in areas at risk of a 1 in 100 year plus climate change flood event where finished ground floor levels are at least 60cm above the 1 in 100 year plus climate change flood level, to ensure the safety of any future occupants.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Part (c) should be amended to protect the character and appearance of the natural environment</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Policy should refer specifically to security, crime and anti-social behaviour.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Policy should protect affordable and specialist housing and 3/4-bedroom houses from conversion to HMOs and support de-conversion back to houses.</li> </ul>

7) Black Country Economy			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
Employment Chapter	0	3	10
Employment Evidence	0	3	1
EMP1 – Providing for Economic Growth and Jobs	1	9	15
EMP2 – Strategic Employment Areas	0	1	3
EMP3 – Local Employment Areas	1	1	2
EMP4 – Other Employment Sites	1	2	1
EMP5 – Improving Access to the Labour Market	0	1	1

Policy, Proposal or Main Heading	Key Issues Raised by the Representations (type of respondents which raised these issues highlighted in bold)
The Black Country Economy – General	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Concerned that there is not enough emphasis on the importance of good transport accessibility to employment opportunities and that this should be strengthened.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>Whether the employment land requirement is appropriate given that it contains a degree of aspirational growth over and above the baseline. The Council are unable to provide for employment land needs arising in the Black Country.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>The proposed housing requirement will hamper the recovery and growth of the economy. The scale of new housing proposed in the Plan will result in very modest increases in labour supply which is less than that required to support levels of required jobs growth.</li> <li>The balanced approach to delivering employment land, but that there should be recognition of the impact of CV-19 in terms of home working and flexible working patterns – the Plan should consider local employment hubs close to where people live.</li> </ul>

	<ul style="list-style-type: none"> <li>• The sites currently occupied by employment activity which are allocated for housing in the Plan are not supported by evidence of deliverability and availability and should be removed as a source of housing capacity.</li> </ul> <p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• The Employment Key diagram is poor and does not give sufficient detail on where employment sites are planned.</li> <li>• A member of the public has suggested that the types of activities driving the demand for employment land are dependent upon HGV drivers of which there is a shortage.</li> <li>• The Plan should encourage low carbon, hi-tech high wage industries with a smaller footprint than traditional heavy industry. We should build on former and underutilised existing business sites.</li> </ul> <p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• The employment land evidence underestimates the quantitative and qualitative requirements and does not reflect the drivers of current and future demand. There is a need to provide for margin and choice, and the lack of strategic sites within the Black Country increases the quantum of land that needs to be exported to neighbouring areas. Birmingham and South Staffordshire have strong economic interactions with the Black Country.</li> <li>• The Sustainability appraisal of the Preferred Option (J) is not complete without an assessment of the implications of how unmet needs will be accommodated either through cross-boundary provision or the alternative which is to meet more of the requirement in the Black Country green belt. The former will require an understanding of what the options for exporting to neighbouring areas actually are.</li> <li>• The GVA based approach to identifying manufacturing requirements is a sound one.</li> <li>• Expressing concerns over the employment land requirement: <ul style="list-style-type: none"> <li>○ the employment-based approach to identifying logistics requirements is not supported by any justification / explanation and this underestimates the amount of land required.</li> <li>○ Using past trends to inform the logistics requirement exacerbates the problem of constrained supply of the appropriate location, quality and size of site.</li> <li>○ The projections must be questioned based upon the evidence of activity in the occupier and development land markets both in the long term, and in the period since the onset of the pandemic in March 2020.</li> <li>○ The efficiency gains used to reduce the manufacturing land requirement is not supported by robust justification or explanation.</li> <li>○ The land requirement should allow for an additional two years.</li> </ul> </li> </ul>
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EMP1 – Providing for Economic Growth	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>The employment land requirement needs to be reviewed because of uncertainties created by the CV-19 pandemic, the potential double-counting of need on sites in SStaffs where sites are serving the Black Country but are counted as meeting need in SStaffs.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>The employment land requirement is underestimated, and the deliverable supply is overestimate. There is also a mismatch between the quality and types of sites demanded and those being supplied – especially in the case of strategic sites (25ha+). The key concerns are: <ul style="list-style-type: none"> <li>The approach is not consistent with the original EDNA / SEP.</li> <li>Methodology of the derivation of GVA need is not clear, completions data is based on constrained supply and takes no account of land delivered on the edge of the Black Country in SStaffs.</li> <li>Economic assumptions made.</li> <li>Under-estimate of the land required for B8 uses.</li> <li>The extent of replacement for losses.</li> </ul> </li> </ul>
	<p><b>Business Owner</b></p> <ul style="list-style-type: none"> <li>The Plan should be seeking to meet needs in full within the Black Country. The current approach is flawed because too much weight is put on the impact on the natural environment and landscape in the Sustainability Appraisal which supports the Strategy, and there is an absence of agreement with neighbouring areas to meet the needs.</li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>The employment land supply in the Black Country is overestimated by 74ha – land that will be brought forward on ‘other’ sites, mainly through redevelopment and intensification – this is redevelopment of the existing stock and not net additions which will meet forecast needs.</li> <li>for existing allocations, the BCAs and WMCA should work together to ensure their delivery to provide for as many jobs within the Black Country as possible.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Concerned with the lack of recognition of the visitor economy and the accommodation of hospitality sectors.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Asked for the inclusion of a number of green growth jobs targets in the plan in Dudley.</li> </ul>
	<p><b>Stakeholder</b></p>



	<ul style="list-style-type: none"> <li>• Welcome the allocation of the 100+ sites to meet industrial and logistics activities, the inclusion of EZ projects around M54, Darlaston and Brierley Hill and the protection of 3,000ha of existing employment areas.</li> <li>• requested that the Plan includes a reference to sustainable development of industrial and mention of the Repowering the Black Country project.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Unable to advise whether this scale and location of employment development is acceptable in the absence of a strategic transport assessment and associated modelling.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• Do not have sufficient land to meet their own needs without removing land from the green belt.</li> </ul>
EMP2 - Strategic Employment Areas	<p><b>Landowner</b></p> <ul style="list-style-type: none"> <li>• the Policy should provide for greater flexibility and should refer to ‘allowing employment generating uses or a mixed-use employment led scheme’ on an allocated employment site, will retain the importance of the employment area whilst allowing the policy to be adaptable to the specific set of circumstances.</li> </ul>
	<p><b>Landowner</b></p> <ul style="list-style-type: none"> <li>• Welcoming part 4 of the Policy in principle but suggesting that it should be widened to accommodate a range of other uses for the tenants of these industrial areas. Such additional facilities reduce travel and make these industrial areas more attractive to existing and potential tenants – such uses include children’s facilities, vets, food and drink outlets.</li> </ul>
	<p><b>Parish Council</b></p> <ul style="list-style-type: none"> <li>• How the employment land shortfall is being addressed and what are the implications for South Staffordshire.</li> </ul>
EMP3 – Local Employment Area	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• The Policy could conflict with the approach set out in Policy DEL2 which allows for housing development on previously developed land. To address this, the Plan should contain an employment protection Policy setting out the criteria to test proposals for housing on employment sites. This could be included in HOU1 and/or EMP1-4.</li> </ul>
	<p><b>Landowner</b></p> <ul style="list-style-type: none"> <li>• Welcoming part 4 of the Policy in principle but suggesting that it should be widened to accommodate a range of other uses for the tenants of these industrial areas. Such additional facilities reduce travel and make these industrial areas more attractive to existing and potential tenants – such uses include children’s facilities, vets, food and drink outlets.</li> </ul>
	<p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>To provide for the protection of existing activities not currently listed in a-f of Part 2 of the Policy, and to provide flexibility for the redevelopment of these sites going forward.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Generally supporting the Policy but suggesting that it may result in the retention of poorly maintained premises in prominent locations adjacent to new housing which can work against the objective of encouraging inward investment, attracting visitors and aspirational housing.</li> </ul>
EMP4 – Other Employment Sites	<p><b>Landowner</b></p> <ul style="list-style-type: none"> <li>It allows other employment uses to be introduced in employment use or to be redeveloped for other uses which could include housing. Such an approach is in line with the advice in paragraphs 122 and 123 of the NPPF.</li> </ul>
	<p><b>Business</b></p> <ul style="list-style-type: none"> <li>The Policy is too inflexible to provide for beneficial alternative forms of development to be brought forward on EMP4 locations, specifically in relation to retail uses. Alternative wording is suggested which would remove the need for the marketing of sites for industrial / logistics / employment uses or evidence to show that these uses are not viable where the proposed use would give rise to net positive employment.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>While supporting the Policy in principle, suggest the requirements set out for proposals for the redevelopment of such areas are subjective, impractical and not justified – in particular what is meant by ‘such uses’ in Part b of (2), and the reference to the need to consider needs associated with displaced businesses from other parts of the BC in Part a is difficult to evidence.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>It should be updated to better protect local employment uses as such sites as the case for retention and renewal will always struggle economically against alternative plans to redevelop for housing.</li> </ul>
EMP5 – Improving Access to the Labour Market	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Should be clear that planning conditions and obligations can only be sought where they are necessary to make a development acceptable in planning terms.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>The Policy should more strongly address improving access to employment, especially by sustainable options – how investment in transport can support economic recovery in terms of direct employment to deliver on infrastructure and through improved accessibility to employment opportunities.</li> </ul>

8) The Black Country Centres			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
<i>Centres Chapter: General</i>	0	3	9
<i>CEN1</i>	4	3	12
<i>CEN2</i>	3	3	6
<i>CEN3</i>	2	1	1
<i>CEN4</i>	1	0	0
<i>CEN5</i>	1	1	1
<i>CEN6</i>	0	1	0

Policy, Proposal or Main Heading	Key Issues Raised by the Representations (type of respondents which raised these issues highlighted in bold)
Centres Chapter - General	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>Should prioritise residential provision in centres.</li> <li>Centres are becoming obsolete and need to consider the future of the High Street given issues such as online shopping and Covid. Consideration should be given to the redevelopment of these brownfield sites and the regeneration opportunities.</li> <li>Following Covid, the importance of clean air and green spaces in the centres.</li> </ul>
	<p><b>Wildlife Trust</b></p> <ul style="list-style-type: none"> <li>suggesting the significance of structural changes for the future centres should be made explicit and provides the opportunity to strategically plan for vibrant and desirable centres which support the growth of the Black Country and more strongly set the scene for the review of Area Action Plans (AAPs).</li> <li>The value of well-planned green and 'blue' infrastructure with regards the services it provides in mitigating the impacts of climate change (e.g., urban heating, pollution and flooding) should be made clear and the BCP should set out that this will be a requirement of the review of relevant AAPs.</li> </ul>
	<b>Transport for West Midlands</b>

	<ul style="list-style-type: none"> <li>Emphasised that Tier 2 and 3 centres especially may lend themselves well to being ‘15-minute neighbourhoods’, especially where new development is taking place, and this should be explored as a potential policy in the Black Country Plan</li> </ul> <p><b>Turley on behalf of Aldi</b></p> <ul style="list-style-type: none"> <li>No analysis of qualitative factors such as whether existing stores are overtrading or under trading relative to company average turnovers.</li> <li>The approach to the formulation of retail policy in the BCP is heavily influenced by the outputs of the Study and particularly the findings that there is only a very small requirement for new retail floorspace (for both convenience and comparison goods) over the Plan period. This has led to the formulation of policy which sets unduly high hurdles for new edge or out of centre development to achieve, coupled with no policy incentive for LPAs to review and expand their designated centre boundaries to accommodate no new retail development in the second-tier development plans.</li> <li>Of particular concern regarding the formulation of retail policy in the draft BCP, which we consider is directly influenced by the outputs of the BCCS, is the setting of a local threshold of 280 sq. m for the submission of retail impact assessments for all edge or out of centre retail proposals (Policy CEN6). This is considered to be very low (and in our view unjustified) threshold is a direct consequence of the view that as there is very little qualitative need for new convenience retail floorspace. We consider that such a perspective is based on speculation rather than evidence and does not form a sound basis to construct policy.</li> </ul>
CEN1	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>Support the diversification of uses in Brierley Hill and the monorail should be brought back.</li> <li>Regeneration should not harm any heritage assets.</li> <li>Should allow redundant offices to convert to residential units</li> </ul> <p><b>Black Country UNESCO Global Geopark Partnership</b></p> <ul style="list-style-type: none"> <li>emphasised the importance of natural and built heritage in Policies CEN1 &amp; 2</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>reference to sports uses should be added to CEN2 part 1b) and CEN3 part 1) in-line with the NPPF. Sport and recreation uses should be included within part 1) 'appropriate uses', consistent with NPPF Glossary definition of Main Town Centre Uses, and helps foster healthy communities and increasing social interaction and cohesion.</li> <li>An amendment is suggested to para 8.15 referencing sports uses in part a).</li> </ul> <p><b>West Midlands CPRE</b></p>

	<ul style="list-style-type: none"> <li>• The impact of the pandemic on the contraction of centres e.g., in retail and office terms has implications on the balance of uses in centres.</li> <li>• Support the need for residential provision in centres and the need for good connectivity. Particular consideration should be given to widening the socio-economic base of the Black Country, and designing schemes which capitalize on the transport links to the centres.</li> <li>• Studies haven't yet taken into account fully the impact of pandemic and recession. There's considerable scope for new land to come forward for housing from redundant retail and employment land and this should be accounted for.</li> </ul>
	<p><b>Residents, NXD Consulting and CPRE West Midlands</b></p> <ul style="list-style-type: none"> <li>• Centres have been damaged due to the move to online shopping leading to vacant units and other uses should be considered including residential which would be beneficial to residents being within walking distance of amenities</li> </ul>
	<p><b>Tyler Parkes on behalf of the Chief Constable of West Midlands Police</b></p> <ul style="list-style-type: none"> <li>• Policy CEN1 encourages the expansion of the leisure evening economy which will be a significant area of growth and objects to the lack of appropriate wording within Policy CEN1 policy to address the expansion of the leisure evening economy which will impact Policing and could potentially undermine the Plan's vision and objectives and the NPPF objectives for sustainable development. Suggested examples of problems and relevant safety issues of the evening economy are cited, such as fear of crime and access to and from the facilities. Modified wording to the Plan is suggested.</li> <li>• As per Policy CSP5 'Cultural Facilities and the Visitor Economy' the CCWMP highlights the need to consider the threat of terrorism and measures to minimise crime and anti-social behaviours which can be associated with large gatherings, such as in town centres. The NPPF is cited requiring that local planning authorities should anticipate and address possible malicious threats, especially in locations where large numbers of people are expected to congregate and PPG sources of guidance are identified. Suggested policy wording is provided.</li> </ul>
	<p><b>D2 Planning on behalf of London Cambridge Properties</b></p> <ul style="list-style-type: none"> <li>• Own a number of retail centres in the Black Country and want to ensure that all of these retail holdings are identified within the hierarchy of centres and policies must be flexible given the ongoing difficult conditions with the retail sector to allow a range of uses including retail, leisure and residential.</li> </ul>
	<p><b>MH No.1 Limited Partnership and Ellandi</b></p>

	<ul style="list-style-type: none"> <li>• Strongly support Merry Hill’s continued inclusion as part of the Brierley Hill Strategic Centre as it recognises the crucial role Merry Hill plays in the sub-regional economy and will help to facilitate the continued regeneration and improvement of the centre and wider Strategic Centre of which it forms a part.</li> <li>• The Plan’s overall approach to direct new residential and employment development across the Black Country to support and contribute to the regeneration of existing centres; the recognition that recent changes in the retail sector suggests that shopping and service needs of existing and future residents can be met by the current centres hierarchy, and the recognition there may be a change in the concentration of retail uses to ensure viability is strongly supported as it represents a realistic reflection of the challenges faced by the retail sector and provides the best opportunity to deliver the regeneration and continued health of the Black Country’s centres.</li> <li>• It is recommended that this approach is strengthened and that the Plan makes it clear that its focus is that appropriate investment should be directed to the Strategic Centres in the first instance in accordance with the centre hierarchy.</li> </ul>
CEN2	<p><b>MH No.1 Limited Partnership and Ellandi</b></p> <ul style="list-style-type: none"> <li>• emphasise the need for flexibility in respect of the range of uses within the Strategic Centres. This would reflect the dynamic nature of the retail market where fast paced change through disruptive processes requires responsive policies and planning decisions that allow centres to benefit from this pace of change. The Strategic Centres are the key drivers of the Black Country economy, and it is crucial that they are able to quickly adapt and respond to ever quicker market changes.</li> <li>• It is not considered that an updated Area Action Plan is the best mechanism to provide this for Brierley Hill and the other Strategic Centres, given the current nature of the market for retail and other town centre uses is changing at an unprecedented pace and planning policy mechanisms that would be more efficient and responsive than an AAP in helping to shape the future regeneration of Brierley Hill Strategic Centre could more appropriately include either a Supplementary Planning Document or Development Framework that would help to guide future development</li> </ul> <p><b>D2 Planning on behalf of London Cambridge Properties</b></p> <ul style="list-style-type: none"> <li>• Supports the policy as it seeks to allow a range of uses to be accommodated in Tier One Strategic Centres</li> </ul>
CEN3	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Need to bring back and encourage small shops in centres</li> </ul> <p><b>A&amp;J Mucklow (Investments) LTD</b></p>

	<ul style="list-style-type: none"> <li>Agree with the recommendation that Halesowen remains a Town Centre in the hierarchy of centres, given its vitality and viability. However, they disagree with the conclusion that the "town centre boundary for Halesowen should not be amended as the existing road boundaries provide a physical barrier to the centre's boundaries". The Local Plan should be more visionary and bolder in its thinking and should consider alternative options such as a link or crossing. By making policies more flexible, new development can change with the forever adapting world and reduce the dominance of the car.</li> </ul>
	<p><b>D2 Planning on behalf of London Cambridge Properties</b></p> <ul style="list-style-type: none"> <li>Give support to this policy which allows a range of uses within Tier Two Centres, such as retail, offices, leisure, residential, community, health, education and cultural facilities etc and emphasise the emerging policy needs to be as flexible as possible to allow a range of uses to ensure that these centres continue to be viable</li> </ul>
	<p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>Support and suggests reference to sports uses should be added to CEN2 part 1b) and CEN3 part 1) in-line with the NPPF. Sport and recreation use should be included within part 1) 'appropriate uses', consistent with NPPF Glossary definition of Main Town Centre Uses, and helps foster healthy communities and increasing social interaction and cohesion. An amendment is suggested to para 8.15 referencing sports uses in part a).</li> </ul>
CEN4	<p><b>D2 Planning on behalf of London Cambridge Properties</b></p> <ul style="list-style-type: none"> <li>Support to this policy which allows 'appropriate' uses within Tier Three Centres. However, we believe that 'appropriate' uses need to be defined and should include the range of uses identified in Policy CEN3 namely, retail, offices, leisure, residential, community, health, education and cultural facilities. The policy should be amended accordingly.</li> </ul>
CEN5	<p><b>D2 Planning on behalf of London Cambridge Properties</b></p> <ul style="list-style-type: none"> <li>Support in principle to this policy which allows the provision of small-scale use of up to 280sqm gross subject to a range of criteria. The Policy states that the loss of some local facilities will be resisted e.g., convenience shops, pharmacy etc. It is unclear how this criterion would be controlled given that many of these uses can now change within Class E without requiring planning permission. It is therefore recommended that this criterion be deleted.</li> </ul>
CEN6	<p><b>Turley on behalf of Aldi</b></p> <ul style="list-style-type: none"> <li>We consider that Policy CEN 6, as proposed, sets out an unduly high bar for proposed edge or out of centre retail development to meet in respect of retail impact considerations. The national default threshold for the submission of RIA within England, contained in the NPPF, has been set at 2,500 sq. m gfa for a number of years.</li> </ul>

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|--|---|
|  | <ul style="list-style-type: none"><li>• The Black Country contains four authorities that wrap around and are intrinsically interlinked with Birmingham City. Birmingham City also has a hierarchy of defined centres, and they are not materially different in size or function to those in the Black Country, notwithstanding any differences in nomenclature. They face the same issues and opportunities regarding edge and out of centre development. Nevertheless, Birmingham Council, in the Development Plan, have accepted the NPPF level threshold for submission of RIA. We can see no sound reason for the BCP adopting a different threshold. The adoption of the NPPF threshold in the BCP would provide a consistent basis for assessing retail impact in the conurbation. There is no evidence-based support for imposing such a low threshold for RIA across the Black Country area</li></ul> |
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9) Transport			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
Transport Chapter	1	3	15
TRAN1: Priorities for the Development of the Transport Network	8	7	22
TRAN2: Safeguarding the Development of the Key Route Network	1	1	3
TRAN3: Managing Transport Impacts of New Developments	3	4	7
TRAN4: The Efficient Movement of Freight	3	1	6
TRAN5: Creating Coherent Networks for Cycling and Walking	8	2	8
TRAN6: Influencing the Demand for Travel and Travel Choices	2	0	4
TRAN7: Parking Management	0	2	5
TRAN8: Planning for Low Emission Vehicles	5	6	12

Policy, Proposal or Main Heading	Key Issues Raised by the Representations ( <i>type of respondents which raised these issues highlighted in bold</i> )
Transport – General	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Support alignment with WMLTP and regional funding streams, which offer over £1.5bn in total. More comments possible once modelling data relating to new land policies becomes available. TfWM will support.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Complaints over TfWM networking being complicated, inflexible and overpriced. Ticketing system is complicated. Market research on bus usage should strive to find out why not just simple questions. Out of town centres with free parking has jeopardised local centres and public transport. Simpler fayres and more accessible buses will increase usage. Reduce or simplify zones.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Investment in an improved public transport network provides the opportunity to provide well-planned green and blue infrastructure integrated into the network. The value of well-planned green and blue infrastructure with regards the services it provides and in achieving the desired outcomes described in 9.2 and 9.3 should</li> </ul>

	<p>be made clear. Furthermore, it should be set out in the BCP that this will be a requirement in the planning of public transport network improvements from the earliest stages. Further detail on the requirements for green and blue infrastructure investment should be described in each of the Transport policies.</p>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Feel that there is little that the four boroughs can do to improve transport links although the ambitions for the Metro and the Stourbridge line are to be applauded. Money will be the key as much as existing land use. There is little scope for improving the road network and it is right that we move towards more sustainable transport links. Canals are now part of the leisure industry but at least they provide safe walking paths (speeding cyclists permitting) and useful wildlife corridors.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Given the climate crisis all plans should incorporate the following requirements: 4) Improvement of public transport including a fit-for-purpose segregated cycle lane network, substantial extensions to the tram network, enhanced bus services including late night buses and adequate connections to outlying rural locations, enhanced train services including new stations, late night trains and restoration of the missing links between Wolverhampton &amp; Walsall, Stourbridge &amp; Dudley and Dudley &amp; Walsall.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Support the recognition in the BCP that a modernised and sustainable transport network is important in helping to address the climate crisis, and the specific objectives of reducing pollution and road congestion through improvements to public transport, promoting walking and cycling networks and reducing the need to travel.</li> <li>• Support the recognition in the BCP that transport strategy in the Black Country has a key role to play in reducing carbon emissions and the impact on the natural environment, and the need to focus on promoting the appropriate design, location and layout of development, increasing investment in infrastructure, improving the quality, equality and accessibility of public transport, supporting walking and cycling, enhancing road safety and reducing the amount of emissions produced by transportation.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Ask for more frequent bus services and repair of damaged roads and pavements. Need transportation like trams buses and trains to run more frequently</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Specific consideration of waste logistics and related impacts in Chapter 9 could also be useful, especially given the central location of the Black Country. Scope for developing 'Waste by Rail' options, -rather than by</li> </ul>

	<p>road should be considered as this allows large amounts of waste to be moved longer distances relatively efficiently. Large waste vehicles can also deter people from cycling.</p>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• What improvements to transport will be needed to support new developments and where will they be located?</li> <li>• No new evidence base submitted as part of the Local Plan</li> <li>• No methodology for the review of the Strategic Transport Evidence Base.</li> <li>• No Strategic Transport Assessment to inform the review.</li> <li>• All 8 Transport Policies currently have no indicators or targets associated with them.</li> </ul>
	<p><b>Resident Group</b></p> <ul style="list-style-type: none"> <li>• Wider region should be considered in transport. I would have thought strategic included cross boundary BC issues linked to cooperate with adjoining authorities. There does not seem to be anything in BC Plan putting proposals in wider WM Region setting.</li> <li>• The plan needs to be tested in relation to WM and Staffordshire Plans for development.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• There is a need for all WMCA related authorities to work together on improving and simplifying public transport. Currently, it would appear that a number of authorities are working on their own improvements. What is needed is a greatly simplified ticketing system that moved away from the ridiculously high number of options currently available. Regular public transport users should have access to a single card that provides seasonal and PAYG options associated with a ticket price that is standard across all areas and is associated with a time limited travel period. See Finland's HSL.FI for an excellent example.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• The majority of areas shown as neighbourhood growth have the worst transport links &amp; infrastructure. The south of the map shows minimal growth areas, but has better transport link, it makes no sense</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• This section needs to be the main focus of the document. The Black Country transport infrastructure is already on its knees and needs a complete new vision. A working transport infrastructure underpins every other element of this plan and should be the highest priority. Minor improvements and a reliance on public transport will not work, it needs a fundamental change.</li> </ul>
	<p><b>Local Authority</b></p>

	<ul style="list-style-type: none"> <li>• We note that detailed transport modelling work to support the Local Plan is ongoing and will be available to inform the publication Plan. It is unclear at this time whether the detailed transport modelling work being undertaken extends to Worcestershire’s transport network that may be impacted by the proposed Plan.</li> <li>• We would welcome the opportunity to meet with the Black Country authorities to better understand the scope and methodology for the detailed transport modelling work being undertaken. It may also be beneficial to establish a transport working group that meets regularly throughout the development of the Local Plan to collaboratively progress and inform the transport evidence base.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Better parking for disabled cars better free transport on disabled small buses for off peak times less congestion get rid of E scooters not on roads as they are dangerous 20 mph on housing estates off main road and speed cameras on all housing estates side roads stop speeders.</li> <li>• All bike rider should be make where a helmet compulsory &amp; push bike riders and E scooter or take bikes off them up till got helmet like if got no tax insurance on your car police take car off you so do it to all bike riders &amp; scooter riders and quad bikes and made to wear a high vis coat and lights on.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• WCC is the Highway Authority for Worcestershire and is responsible for operating and maintaining the county’s local road network, both in respect of current activities and needs as well as its long-term operation and integrity. It is on the basis of these responsibilities that the comments that follow are made.</li> <li>• Our network adjoins the Draft Black Country Plan area at the A456, to the immediate south of Halesowen, the M5 to the south of Quinton and the A449 located to the south of Stourton. We are keen to ensure that transport and land use planning policy is closely integrated, so that the Worcestershire transport network is able to facilitate the delivery of sustainable economic growth.</li> <li>• We are interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan process that may impact on Worcestershire’s highway and transport network, and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.</li> <li>• In summary, as a minimum, in order for the transport evidence base to satisfy the requirements of the NPPF, it is necessary to establish: <ul style="list-style-type: none"> <li>○ The transport impacts of the development allocations.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ The improvements necessary to ensure that the impacts are not severe.</li> <li>○ Any land required for the delivery of the necessary improvements.</li> <li>○ The cost of the necessary improvements.</li> <li>○ Any other deliverability constraints.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>● It should be noted that we had anticipated that a new transport evidence base would be submitted in support of the plan. By providing a transport evidence base, we as the Strategic Highway Authority have a clear and defined reference for working alongside Local Highway Authorities to plan for and mitigate against the impacts of forthcoming future development, enabling infrastructure for growth.</li> <li>● A number of the documents that form the evidence submission in support of the plan are considered dated, or in the case of the Black Country Plan Transport Modelling Study, are unavailable for review. Therefore, a refresh of the evidence base should be considered.</li> </ul>
TRAN1 -	<p><b>Planning Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>● The transport chapter identifies that the delivery of an improved and integrated transport network is fundamental to achieving transformation of the Black County, to deliver housing growth and improve economic performance. It recognises that the Covid-19 pandemic and a shift towards homeworking has had a significant impact on public transport patronage levels, which may take a number of years to recover. It nevertheless reiterates that high quality public transport remains at the heart of the Black Country transport strategy.</li> <li>● Paragraph 9.6 identifies that specific objectives should include reducing pollution and road congestion through improvements to public transport, promoting walking and cycling networks and reducing the need to travel. Taylor Wimpey recognises that pursuing these objectives will result in some potential improvements to both pollution and road congestion. However, whether significant improvements to public transport provision on their own will make any material difference to either reducing pollution or road congestion is debatable, particularly when the public transport improvements are likely to relate to the improved bus services provision, e.g., more bus services running along existing routes.</li> <li>● Generally supports the approach identified in Policy TRAN1 (Priorities for the Development of the Transport Network) which includes safeguarding land needed for the implementation of priority transport networks, providing adequate access to all modes of travel in association with new developments, key transport corridors being prioritised through the delivery of new infrastructure to support various transport improvements and the various identified specific transport improvements. However, it is unclear how paragraph 9.20, which predicts that bus services will have recovered at a faster rate than even rail or metro by 2026, has been</li> </ul>

	<p>evidenced. In addition, the emphasis on bus services should recognise that congestion is likely to be a significant factor both on patronage, attractiveness of the bus and journey times.</p>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Part 2 of draft Policy TRAN1 (Priorities for the Development of the Transport Network) sets out that “all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport. Residential development will be expected to meet the accessibility standards set out elsewhere in this Plan”. We agree that it is appropriate for new developments to provide access for sustainable transport modes where possible.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• An available, efficient, easy to use and cost-effective transport network is required to support employment, our industry, our economy and our society.</li> <li>• Ongoing green development of our transport network will require industry to provide innovative solutions which will support employment the economy.</li> <li>• Transport development and innovation hubs will create employment opportunities which will help to reduce levels of poverty.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• The reopening of Stourbridge to Dudley (OWW main line) Dudley to Walsall (and beyond, South Staffordshire line) and Stourbridge to Wolverhampton (via Wombourne) line for local and THROUGH Passenger and goods services is vital to combatting this areas extremely congested roads</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• One might suggest bringing back the ever-loved monorail... sustainable transport anyone?</li> <li>• Who doesn't love a tram? Only uncool people don't like trams. Great plans for the Wednesbury to Brierly Hill extension and consider doing more!</li> </ul>
	<p><b>Local Councillor</b></p> <ul style="list-style-type: none"> <li>• Regarding public transport, the lay-out of new housing development needs to be sympathetic to efficient penetration by bus services. In particular, to avoid wherever possible the creation of large dead-end housing developments which, while the mitigate against rat-running by motorists, will involve buses having to double-back on themselves, resulting in inefficient, time-wasting - and often unviable - diversions to journeys.</li> </ul>
	<p><b>Resident</b></p>

<ul style="list-style-type: none"> <li>Expensive road projects, such as The M6 Toll- M54 link road should not be prioritized. We would also strongly oppose any return of the Western Strategic Route (previously called the Western Orbital Route), which was until recently supported by Midlands Connect.</li> </ul>
<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Good, transport infrastructure is essential to facilitate Black Country regeneration by making it easier for people and goods to get from "a" to "b". A lifetime of travelling to work all over the WM conurbation, convinced me that, to deal with the problem of road congestion, some sort of off-road public transport network with Park &amp; Ride was needed (Railways and/or Tramways and/or dedicated Busways). In our climate, Cycling is impractical. Adequate Car Parking needs to be provided within Town Centres to avoid deterring new residents, imprisoning existing ones and promoting their exodus - and to cater for external workers.</li> </ul>
<p><b>Agent on behalf of Landowner</b></p> <ul style="list-style-type: none"> <li>Policy TRAN1 of the Plan covers priorities for the development of the transport network and sets out arrange of specific improvements that are intended to be delivered over the plan period including the extension of the Midland Metro network from Wednesbury to Brierley Hill. These improvements are supported to increase accessibility across the Black Country to boost economic activity and increase the proportion of journeys made by sustainable transport modes.</li> </ul>
<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Object to all proposed road improvements/new road building, especially motorways.</li> <li>Extending Metro from Brierley Hill to Stourbridge Junction, and from Wednesbury to Walsall along former heavy rail corridor in addition to Wednesbury to Brierley Hill sections already approved and under construction urgently needs to be moved to the top of the list of schemes for future funding.</li> <li>Metro route on old railway line from Brookmoor to Wolverhampton via Wombourne in conjunction with South Staffs District Council should be another top priority.</li> <li>Buses in West Midlands need to be taken over and directly operated by West Midlands Combined Transport Authority.</li> </ul>
<p><b>Planning Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>Generally, support the approach identified in TRAN1 which includes safeguarding land needed for the implementation of priority transport networks, providing adequate access to all modes of travel in association with new developments, key transport corridors being prioritised through the delivery of new infrastructure to support various transport improvements and the various identified specific transport improvements."</li> </ul>

	<ul style="list-style-type: none"> <li>It is unclear how paragraph 9.220, which predicts that bus services will have recovered at a faster rate than even rail or metro by 2026, has been evidenced. In addition, the emphasis on bus services should recognise that congestion is likely to be a significant factor both on patronage, attractiveness of the bus and journey times."</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Passing legislation that requires summer tyres to be replaced with all season/all year or stud-less winter tyres during the winter months</li> </ul>
	<p><b>Land Promoter</b></p> <ul style="list-style-type: none"> <li>Fully support the content of this policy as this will support the clear objective for a step change in public transport provision within the Black Country, which can help serve and link centres, improve sustainable transport facilities, improve connectivity to national networks and improve the efficiency of strategic highway networks. These are essential as part of a package of measures to address the climate change crisis, whilst also key to helping support both proposed housing and economic growth.</li> <li>However, RSL are unclear as to how land is to be safeguarded within the BCP and consider that the policy and/or the wider Transport Section of the BCP would benefit from additional detail, particularly in regard to specific projects that are key to securing the required step change to ensure these are not compromised. It is also of relevance to make reference to the recent WMCA Board approval of the bid to the Government's City Region Sustainable Transport Settlement (CRSTS) fund in September 2021, which covers a wide range of projects that would be funded within the Black Country, including extensions to the Metro network, a new railway station at Aldridge and development of key interchanges such as Dudley Port.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Supports part 2) of the policy that refers to all new developments must provide adequate access to all modes of travel including walking and cycling and the need to meet accessibility standards. However, the policy stops short of requiring developments to contribute to a modal shift to active travel which seems a missed opportunity, since a strong case can be made for requiring developers to do their part to reduce reliance on private cars. Can the policy be strengthened to address this point? Sport England supports part 3) of the policy that includes reference to prioritising key transport corridors for active travel, though the key transport corridors listed in part 4) of the policy do not specifically include any priorities relating to walking and cycling, referring only to priorities for motorways, rail, rapid transit, key road corridors, and interchanges. The associated justification also doesn't make any reference to active travel priorities. This then suggests that the</li> </ul>



	<p>priorities are not active travel related? Can this be addressed by strengthening the policy to provide reference to key corridors for walking and cycling, potentially linked to the national cycle network, existing infrastructure such as canal towpaths etc?</p>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Supports the aspiration to improve transport across the sub-region. Priority for spending should be on public transport schemes.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• We welcome reference to the Council’s transport strategy for the Black Country Area. We are keen to understand what stage the proposals listed within the policy are at, and what assessment has been undertaken to date to understand the impacts for the significance of heritage assets including their setting.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Rapid transit should also include A456 Hagley Road. This aligns with the CRSTS submission for rapid transit development funding along this corridor</li> </ul>
	<p><b>Resident Group</b></p> <ul style="list-style-type: none"> <li>• The Trust believes that there needs to be a recognition of and responses to the relationship of Wombourne and other areas to the west of the Black Country and related movement issues. Reference has already been made to the A463 Corridor. The trust does not believe increasing road capacity would be an appropriate response. However Public Transport must be improved.</li> <li>• This corridor is an important gateway to the Black Country from the west. In consultation with the Staffordshire authorities the visual impact of the route could be enhanced by opening up vistas revealing the views from the road. There would be benefits in terms of the attractiveness of the areas to residents, businesses and others of applying more widely the ideas of corridor enhancement contained with schematic illustrations in the Conurbation report published in 1948 and in part implemented along the A4123 in Oldbury</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Against smart motorways</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• TfWM welcomes these key transport priority schemes, but these must be fully cross referenced with the CRSTS scheme allocations and BSIP schemes.</li> </ul>

	<ul style="list-style-type: none"> <li>• In terms of point 3 in policy TRAN1, we feel this needs to be reworded to state “Key transport corridors will be prioritised through the delivery of infrastructure to support active travel (walking, cycling), public transport improvements (including HS2 Connectivity Package measures).</li> <li>• West Midlands Rail Executive in particular, feel the plan needs expanding upon further, capturing several additional rail projects, and the policy text should therefore be amended to the following: <ul style="list-style-type: none"> <li>i. Wolverhampton – Walsall service and new Willenhall &amp; Darlaston stations</li> <li>ii. New Aldridge station and service to Walsall/Birmingham</li> <li>iii. Midlands Rail Hub</li> <li>iv. Wolverhampton – Shrewsbury Line Improvements</li> </ul> </li> <li>• Additional policies should also be included in TRAN1 (rail section), and these are outlined below with further details provided in appendix A: <ul style="list-style-type: none"> <li>v. Rail line re-openings of Sutton Park Line and Walsall – Lichfield</li> <li>vi. Future rail network capacity upgrades vii. Train maintenance and stabling depots</li> </ul> </li> <li>• And while there is some uncertainty about the rail proposals as referenced above, this doesn’t mean the schemes shouldn’t appear with in the Black Country Plan.</li> </ul>
	<p><b>Business Owner</b></p> <ul style="list-style-type: none"> <li>• The Black Country is blighted by empty and non-commercial high streets which, with more creative thinking, could be adapted to bring in smart residential units linking in with such things as the new metro extensions. Not only would town centres benefit from increased footfall but there would be a massive community benefit in having more affordable housing based within walking distance of public transport facilities for commuting to larger commercial centres such as Birmingham.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• We welcome and fully support the plans statements on the need for and integrated and sustainable transport network that seeks to encourage modal shift to public transport and active travel.</li> <li>• However, we are uncertain about section of Policy TRAN 1 and what it contains as it is considered out of date, or referencing schemes which are not committed.</li> </ul>
	<p><b>Local Authority</b></p>

	<ul style="list-style-type: none"> <li>• Within the emerging Plan, there are a number of policies relevant to transport and of interest to WCC Highways. We particularly welcome policies DEL1 - Infrastructure Provision, Tran1 - Priorities for the Development of the Transport Network, and Tran3 - Managing Transport Impacts of New Development. Having reviewed these policies in detail, we feel there may be some minor amendments that may be beneficial in positively supporting the delivery of planned growth. We look forward to discussing these with you as we further engage to progress the transport evidence base.</li> </ul>
	<p><b>Local Group</b></p> <ul style="list-style-type: none"> <li>• Dudley MBC should commit more.</li> <li>• Investment in the walking and cycling infrastructure to join up routes and provide extra cycle lanes. We want to see a 50% increase in people using public transport, walking and cycling in the Borough. Cycle parks should be strategically placed at bus and railway stations.</li> <li>• Traffic calming measures should be introduced in all residential areas to slow traffic, increase public safety and reduce emissions. For example, there are major problems with traffic at all major arterial road leading to and from Dudley Town centre, on Stourbridge Ring Road, through Amblecote, Wordsley and Kingswinford, Russells Hall, Merry Hill, Quarry Bank Brierley Hill, Colley Gate and more. At Oldswinford Cross, Stourbridge and similar sites there are no proper pedestrian crossings. Halesowen Road, Netherton is identified among the top 10 most polluted areas in the West Midlands and currently breaches air quality standards. Dudley Borough has a major traffic congestion problem which must be addressed immediately to ensure we can tackle the Climate Emergency and to ensure the improved health and wellbeing of those who live and work in the Borough.</li> <li>• It is essential that Dudley Council work with West Midlands Transport Authority to invest in a sustainable public transport network. Routes need to be accessible and joined up. It has to be easy for people to leave their cars at home. Local bus services should be fare free and go where people need them at the right times and there is an incentive to not drive.</li> <li>• This is not just about commuting but also about social justice, health and well-being too. For example, re-introducing Sunday services from rail and main bus depots to places like Kinver or Clent so people can access nature and green space when they have family time together. We need to encourage parents and children to walk more to and from schools.</li> <li>• Currently many residential areas have poor air quality near schools as parents or taxis drive children to school and leave engines idling in the street. This cause of this behaviour is often that they don't their children are safe to walk or cycle.</li> </ul>

	<ul style="list-style-type: none"> <li>• Reinstatement of existing rails routes for passengers and freight should be considered rather than spending money on new metro track which does not even join up the public transport network to Stourbridge and mainline rail junctions. Key centres and national rail links need to be included in the transport network for example the Brierley Hill to Stourbridge Junction rail link. Transport depots with toilet /washing and refreshment facilities for freight drivers should be located at suitable supply hubs in the borough and have electric charging points from renewables installed.</li> <li>• Fleet vehicles such as those used by Dudley MBC should be sustainable and run on renewable energy by 2030.</li> <li>• The FoE target for the installation of EV charging points in the Borough by 2030 is 1549.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• We welcome the emphasis on supporting public transport, but we are concerned that the plan still includes support for significant additional road funding, including (TRAN1) Motorway Junction Improvements which will only increase the pressure on local roads and a new link road between the M6Toll and the M54. We would argue that it is far more important to fund local public transport improvements.</li> <li>• We also remain dubious of the benefits of the A34 Sprint, especially if it simply replaces services such as the X51. What is needed is much more significant investment and prioritisation of Public Transport.</li> <li>• We are also concerned that the ambition for sustainable modes, such as walking and cycling are not high enough.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Whilst some major roads are named in the Plan for improvement no mention is made of the A491. This is already a very busy arterial route at most times of the day. Although Dudley Council has made a few minor improvements it is still a huge bottleneck and will only get worse unless drastic action is taken. Time to brush off plans for the Western Orbital Route?</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Where specialist establishments have to be built to serve a borough wide need (hospitals) these will be developed with an integrated transport policy at their heart that ensures we are all able to access a frequent public transport system that provides we are on that transport within fifteen minutes of leaving home. With this level of service being provided for at least eighteen hours a day seven days a week.</li> </ul>
	<p><b>Resident</b></p>

	<ul style="list-style-type: none"> <li>• Prioritising the Metro line between Wednesbury and Brierley Hill is fundamentally flawed. This plan is naive in not recognising that Birmingham is fundamental to the economic growth of the Black Country. The priority should be to improve public transport between Dudley and Birmingham. For Brierley Hill, this means putting in the rail/light rail (doesn't matter what mode, just whatever can be implemented quickest), so that access to/from Birmingham is improved. Nobody will travel for well over an hour from Brierley Hill to Birmingham, via Wednesbury. Without extensions/connections to Stourbridge and Walsall it is a complete white elephant.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Better links are always needed but as long as houses are not affected by this</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Whilst the Policy is good in its vision, it completely ignores the distribution of where the new housing is being proposed and provides no improvements either. Specifically, the new housing developments in Kingswinford where the transport infrastructure is currently inadequate and will be made worse by future developments. A radical solution is required, and not trying to bolster the existing public transport system.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Draft Policy TRAN1 (Priorities for the Development of the Transport Network) advises that key transport corridors will be prioritised through the delivery of infrastructure to support active travel (walking, cycling), public transport improvements, traffic management (including localised junction improvements) and road safety. Part 4 of Draft Policy TRAN1 also emphasises that key transport priorities identified for delivery during the lifetime of the Black Country Plan currently include M6 Junction 10 and key road corridors, including the A454.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• The evidence does not take into account the changes in public use of public transport and possible move to non-public transport options post the pandemic.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• For too long there has been a protracted debate about what mode should be used to bring the Stourbridge to Brierley Hill line back into use. We've had numerous suggestions about tram/train, Parry People Mover, heavy rail etc. As per my previous comment we need this link restored asap to link Brierley Hill to Birmingham. Any feasibility studies should be prioritised and concluded quickly. We need to adopt whatever solution can be implemented quickly and then build on it, and we cannot wait for the Metro to be in place. We need action now.</li> </ul>
TRAN2	<p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>• The supporting text to Policy TRAN2 (Safeguarding the Development of the Key Route Network) sets out how the Key Route Network (KRN) caters for the main strategic demand flows of people and freight across the metropolitan area. Policy TRAN2 goes on to state that the Black Country Authorities will safeguard land in order to implement improvements to the KRN.</li> <li>• It is not clear how this will be achieved; there is no indication as to what these improvements to the KRN might be, nor is there any indication of safeguarded land on the draft Proposals Map. It is considered likely that land ownership constraints will be a significant barrier to the implementation of this Policy.</li> <li>• If housing and employment allocations located on the KRN are required to include safeguarded land and/or deliver improvements to the KRN then this should be made clear through the Plan, as such improvements will ultimately impact upon the viability of the allocations.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• At first sight sections 9.11-9.13 and 9.43-9.44 appear to be contradictory in that the great need for improved rail freight capacity is being stymied by the current construction of the Metro extension between Wednesbury and Brierley Hill. However, Section 9.12 mentions Tram-train technology. This effectively can provide the “get-out clause” that will allow the Metro construction to go ahead, subject to certain provisos.</li> <li>• It has been established the bridge reconstructions currently taking place in Tipton and Great Bridge will be to “heavy rail” standards, as will the reconstruction of the bridge over the A4123. These first steps will enable the track to be re-laid to a standard suitable for carrying freight, with the appropriate axle-loading. Points and crossings, unlike those on Metro Line One will need to be constructed with suitable radii. The acknowledgement that tram-trains will be used ensures that there will be no stupid conflict as happened in Sheffield because someone tried to re-invent the wheel.</li> <li>• It is probably too late but perhaps consideration should be given to constructing the Metro route south-west of Dudley on a new road alignment. The route could follow the A4101 as far as Russells Hall and then follow the Stourbridge Road to Brierley Hill and Merry Hill. By this route it would pass closer to the communities that the line is intended to serve. This would then free up the existing rail alignment for rehabilitation for freight use. Track is already in place for part of the route although some re-alignment would be necessary north of Brierley Hill.</li> </ul> <p><b>Stakeholder</b></p>

	<ul style="list-style-type: none"> <li>Concerning the KRN, TfWM welcomes the inclusion of this policy, but we would like to see further reference of the KRN Enhancement package which is part of CRSTS together with the Highway Investment Strategy and its Highway Investment Package Phase 2. This will be vital in supporting and monitoring the development of the KRN, in conjunction with the KRN Action Plans (produced in July 2021), which should also be included in the evidence base of the plan and referenced.</li> <li>The new WM LTP reflects current Government strategies with a strong emphasis on the importance of the re-allocation of road space, with increased cycling and walking infrastructure and bus priority measures along the KRN. Recognition of this would be welcomed in Policy TRAN2 alongside the ‘Connecting Communities’ programme.</li> <li>Finally, under paragraph 9.30 TfWM request that this be expanded upon to state: “Capital scheme improvements will be identified where appropriate, but it also is vital that this network is managed efficiently through the collaboration of all four authorities in their role as LHA together with neighbouring authorities where routes cross responsibility”.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Policy TRAN2 what assessment has been undertaken with regards to safeguarded land needed for future transport development and the impact on the historic environment?</li> </ul>
TRAN3	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Policy TRAN3 refers to managing transport impacts on new development. The policy states, amongst other things, that mitigation schemes must demonstrate an acceptable level of accessibility and safety can be achieved "...using all modes of transport to, from and through the development". Taylor Wimpey considers this policy needs further revision to take account of circumstances when, for instance, bus penetration through a site may not be possible due to constraints such as site size, physical barriers or other design considerations (delivering high density housing developments based on Manual for Streets principles where bus penetration would be inappropriate).</li> </ul> <p><b>Planning Consultancy</b></p> <ul style="list-style-type: none"> <li>Draft Policy TRAN3 (Managing Transport Impacts of New Development) sets out that “planning permission will not be granted for any proposals that are likely to have significant transport implications, unless accompanied by mitigation schemes that demonstrate an acceptable level of accessibility and safety can be achieved”. We agree that it is appropriate to require a Transport Assessment/Transport Statement and Travel Plan as part of a major planning application to ensure that a new development does not have significant transport implications or can provide an appropriate level of mitigation. This is in line with the requirement of policy 113 of the NPPF.</li> </ul>

	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>We are supportive of Draft Policy TRAN3 (Managing Transport Impacts of New Development), which is consistent with NPPF Paragraph 113, emphasising that Transport Assessments and Travel Plans produced by developers are essential to demonstrate that an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development. Support TRAN3.</li> <li>Paragraph 9.3 - Policy TRAN3 should be revised to take account of physical or design barriers which may exist at sites which could prevent bus penetration through a site.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Development must be designed for efficient public transport, especially buses and it may be necessary to remove the occasional building in developed areas to allow buses to serve areas more efficiently and remove circuitous routes that cause long travel times and are not attractive to passengers.</li> <li>We need a more protective design of bus passenger shelter. The current open fronted shelters are useless when the wind is in the 'wrong' direction as the wind blows the rain onto the people waiting. (I have personal experience.) Also, if vehicles are causing spray this then can easily reach the waiting people. These open fronted shelters do not live up to the name of shelter and must be discouraging passengers.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>We generally support the aspiration of TRAN3. However, mitigation should aim not only to address access by sustainable modes but to prioritize it.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Lack of public transport.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Parked cars on pavements causing problems for accessibility.</li> </ul> <p>Traffic congestion in the borough is also a problem. There appears to be several reasons for this, these include street parking on through roads (including dual carriageways) roadside marked parking areas, poorly designed road systems etc (more gyratory systems please to move traffic more quickly).</p>
	<p><b>Resident</b></p>



	<ul style="list-style-type: none"> <li>Widening the local roads will have a significant negative impact to local residents, increased traffic, air pollution, noise all which are identified as factors which should not have an adverse impact on the local area.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Paragraph 113 of the NPPF advises that all developments that will generate significant amounts of movement should be required to provide a Travel Plan, and the application should be supported by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed. As such, we are supportive of Draft Policy TRAN3 (Managing Transport Impacts of New Development), which is consistent with NPPF Paragraph 113, emphasising that Transport Assessments and Travel Plans produced by developers are essential to demonstrate that an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>TRAN 3 should positively prioritise those modes over car travel and should seek to break down barriers which prevent use of sustainable modes such as unsafe road crossings.</li> </ul>
TRAN4	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Elements of this policy are welcomed, particularly in terms of transferring freight onto sustainable modes of transport like rail and waterways with some of the policy thinking echoing that of TfWM's own Regional Freight Strategy, which will be updated in light of the new WM LTP. However, there are no policies on management measures in the form of restrictions on daytime road deliveries, consolidation initiatives or favourable policy in support driver facilities.</li> <li>In particular, this policy section would benefit from addressing the role of consolidation centres for towns and opportunities for smaller logistics operations for last mile, such as local neighbourhood micro-consolidation facilities, improved routing software together with integrated online sales systems. The inefficiencies of the last mile problem have only been compounded by the continuous rise of ecommerce in retail, which has dramatically increased the number of parcels delivered, as well as raised customer expectations for fast delivery.</li> <li>Policy TRAN4 could also address the use of cargo and eCargo bikes, ZEVs in freight and the use of micromobility and mobility hubs (including parcel lockers). In particular, supporting the shift toward ZEVs within the freight industry could be noted explicitly in this policy together with meeting the refueling needs, through appropriate freight charging stations as part of new development. Adopting cleaner technologies (to</li> </ul>

	<p>help meet air quality improvement goals laid down by the government) is also vitally important, especially as freight vehicles currently account for a disproportionately high percentage of harmful air pollutants.</p> <ul style="list-style-type: none"> <li>• There are also no policies which capture the importance of safety with regards construction vehicles or how these must not hinder sustainable and active travel infrastructure, especially for those more vulnerable road users. Potentially capturing the importance of Delivery and Servicing Plans and Constructions and Logistics Plans, as well as adherence to the Construction and Logistics Community Safety Scheme (CLOCS) could help minimise the impact both HGVs and LGVs will have on the surrounding highway, brought about through new development and construction. Also, in new developments themselves, the importance of ensuring good road safety measures is vital and needs capturing in this policy.</li> <li>• Freight parking requirements are also missing from this policy section, and TfWM would welcome exploration into potential sites for lorry holding areas as well as good off-street servicing facilities and provision of facilities for home deliveries within new developments, whilst not impacting on the wider public realm.</li> <li>• More explicit reference to the Major Road Network (MRN) should also be noted in the plan. This new category of economically important 'A' roads, and Large Local Majors (LLM) schemes (focusing on significant upgrades to local roads) will help unlock housing and economic growth and support the Strategic Road Network across the Black Country.</li> <li>• Policy TRAN4 could also be further expanded upon in terms of rail freight, through capturing further enhancements to the existing rail network which facilitate rail freight growth into and through the Black Country including network capacity and capability upgrades to allow more frequent, longer and heavier trains on key domestic and deep seaport routes</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Delighted to see that existing and disused rail lines are to be protected and sites sought for rail freight facilities. Surely there is a case for reopening the mothballed line to Pensnett which could be used once again for freight but also light rail into the regenerated Brierley Hill area.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• What assessment has been undertaken with regards to safeguarded land needed for future transport development and the impact on the historic environment</li> </ul>
	<p><b>Stakeholder</b></p>

	<ul style="list-style-type: none"> <li>• Welcome the encouragement for the use of waterways for freight. We suggest that the policy could helpfully go further by requiring applicants for major developments to consider the feasibility of using waterborne freight in the construction, demolition, and excavation phases where the development site is adjacent to a navigable waterway. This would set a clearer expectation for developers and indicate to a decision maker how they should consider this issue in a planning application.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Whilst it may be worth investigation, the Canal option is unlikely to be viable in most cases. Rail is most suitable for moving anything in bulk over medium to long distances and should be better utilised and expanded where viable. Provision still has to be made for transport by road from Rail Terminals to the final destination. Hence, road improvements would need to be made to handle that traffic.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Draft Policy TRAN4 (The Efficient Movement of Freight) also encourages road-based freight to use the Key Route Network whenever practicable. In addition, Draft Policy TRAN4 advises that junction improvements and routing strategies will be focused on those parts of the highway network evidenced as being of particular importance for freight access to employment sites and the motorway network. We strongly support Draft Policies TRAN1 and TRAN4, especially as the ongoing investment and improvement of committed transport priorities and projects, including to M6 Junction 10 and the Black Country Route (A454) which are located approximately 2km to the south of the Site, reinforces the suitability of the Site for a high quality employment development as it will be adequately serviced by a variety of travel modes. These transport improvements will support the scale of growth proposed at the Site and within the wider Core Regeneration Area and will also facilitate improved access to the Site for local communities.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• No content on how inland waterways might assist with freight.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• I see the reopening of the Stourbridge - Walsall - Lichfield railway line to freight as a vital artery which will free up capacity for more passenger services elsewhere. Access to heavy rail must be preserved along the sections being used for the Midland Metro extension. Moving more freight to rail must be a priority and the building of HS2 should release further capacity too</li> </ul>
TRAN5	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Policy TRAN5 relates to creating coherent networks for cycling and for walking.</li> </ul>

	<ul style="list-style-type: none"> <li>• It states that creating an environment which encourages sustainable travel requires new development to be linked to existing walking and cycle networks and such links should not be impeded by infrastructure provided for other forms of transport. Taylor Wimpey consider that this reference should be revised to refer to circumstances where transport infrastructure can provide for multiple users, e.g., combined pedestrian/cycle routes and other routes which could be shared by bus services but not car users.</li> <li>• The Policy also refers to cycle parking, although Taylor Wimpey considers this should be further developed to identify not only where cycle parking could be provided in association with commercial or employment uses, but how cycle parking should be provided within residential developments. In this regard, it is generally accepted that provision within rear garden areas or communal open space areas is a preferred option rather than public parking areas which could be subject to inadequate maintenance or poor surveillance.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Draft Policy TRAN5 (Creating Coherent Networks for Cycling and Walking) also encourages new developments to create an environment that encourages sustainable travel via safe and direct links that connect to existing walking and cycling networks, in addition to public transport nodes and interchanges. We are supportive of this policy, as it accords with the requirements of Paragraph 110 of the NPPF, which advises that in assessing sites that may be allocated for development in plans, it should be ensured that appropriate opportunities to promote sustainable transport modes can be taken up, and that safe and suitable access to the site can be achieved from all users.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Very much support more use of our great canal network and the emphasis on more cycle routes and facilities. Cyclists need to get off the main roads or have dedicated cycle lanes if there is to be a real uptake of cycling as an alternative to the private car - on safety and air pollution grounds.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Cycling is not an option for many – especially in bad weather</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Sustainable transport needs to be fully integrated and support key priorities.</li> </ul>
	<p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>• Support Policy TRAN5 and would welcome the canal network being more accessible. We also welcome public realm improvements and consider that there could be opportunities to enhance the historic environment</li> </ul>

	<p>through signage, interpretation, creation of new links and accessibility etc. and would be keen to see this referenced in the policy as a potential aim.</p>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>We generally support the aspiration of this policy. However, the aim should be to prioritize walking and cycling modes with a specific goal of removing barriers which might prevent use of those modes</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Supports the proposed policy wording for cross LA working to ensure a comprehensive network and to common design standards for walking and cycling. We support the emphasis in part 2) of the policy to ensuring new developments link to existing walking and cycling networks, ensuring links are suitably designed to be safe and direct and not impeded. In our experience, developers are often less successful in this area and tend to focus on infrastructure for walking and cycling within their developments. The policy should make it clear how developers will be expected to contribute to improving connecting new development to existing links for walking and cycling: i.e., through developer contributions. Consideration should be given to including requirements within the policy for the provision of showers/changing facilities and lockers within major employment/workplace uses to complement the requirement for cycle parking facilities to positively influence a modal shift</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Paragraph 113 of the NPPF advises that all developments that will generate significant amounts of movement should be required to provide a Travel Plan, and the application should be supported by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed. As such, we are supportive of Draft Policy TRAN3 (Managing Transport Impacts of New Development), which is consistent with NPPF Paragraph 113, emphasising that Transport Assessments and Travel Plans produced by developers are essential to demonstrate that an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Support the thrust of this policy, but it needs to be strengthened to achieve coherent networks well linked into local areas. New developments, and redevelopments should link into existing or potential new networks, and not be planned as unconnected islands. Where possible, the potential for creating safe crossing of busy roads by restoring railway bridges should be explored</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Support, but the network as presented in Figure 9 should be much more comprehensive. At a minimum, all Tier 1 and 2 centres should be connected or in close proximity to the cycling network. Currently it appears</li> </ul>

	<p>Bearwood, Cape Hill, Stourbridge, Cradley Heath, Bilston, Bloxwich, Brownhills, aren't. The network should also not just 'end' - e.g., the stub running west from Blackheath should connect to another section of network. Connectivity to Birmingham cycle networks should also be highlighted and promoted to encourage sustainable travel across the region.</p>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Walking and cycling along canals don't mix, towpaths too narrow. Pedestrians only.</li> <li>• Roads are in a terrible state, potholes, unremoved debris, markings for cycle lanes, etc often worn away. I often cycle on roads in Dudley, but often feel I am mad to do so.</li> <li>• Roads need to be redesigned (and better maintained) to encourage safe cycling and priority for buses, in such a way as to actively discourage and frustrate car drivers.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• We support the requirement, where possible, for existing links such as the canal network to be enhanced. This is consistent with policy ENV7. We have suggested amendments to policy DEL1, above, to further support this.</li> <li>• As well as providing opportunities for sustainable travel within the Black Country, the canal network provides opportunities for sustainable travel to/from neighbouring areas. We note that nothing within policy TRAN5 excludes the possibility of improving such links, but we would suggest that the supporting text is amended to confirm this. At present, much of paragraphs 9.50 to 9.52 'refers to within the Black Country'</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Draft Policy TRAN5 (Creating Coherent Networks for Cycling and Walking) also encourages new developments to create an environment that encourages sustainable travel via safe and direct links that connect to existing walking and cycling networks, and good walking and cycling links to public transport nodes and interchanges. We are generally supportive of this policy as it accords with the requirements of Paragraph 110 of the NPPF, which advises that in assessing sites that may be allocated for development in plans, it should be ensured that appropriate opportunities to promote sustainable transport modes can be taken up, and that safe and suitable access to the site can be achieved from all users.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• TRAN5 should positively prioritise those modes over car travel and should seek to break down barriers which prevent use of sustainable modes such as unsafe road crossings.</li> </ul>
	<p><b>Stakeholder</b></p>

- Whilst there are many elements in this section TfWM strongly welcome, we feel this policy section could further be expanded upon, especially concerning the importance of behaviour change with prioritisation given to sustainable modes of travel, which will be vital in delivering a successful Black Country Plan.
- Under point 1a Park and Ride, there is no mention of TfWM's adopted Park and Ride Policy, nor is there no mention of expanding on Park and Ride ZEV charging and the use of parking charges at Park and Ride sites to encourage people to re-mode.
- Under this point as well, considering future expansion of appropriate intercept Park and Ride sites for the Black Country (where users do not live near to inter-urban and local rail stations) maybe worth exploring further with TfWM Officers and included in policy, where appropriate. Yet also noting Park and Ride is not a demand management tool if it generates more car-based trips which could be walked and cycled.
- Under point 1b, reference to the West Midlands UTC scheme is made, yet TfWM would also welcome acknowledgement of the Regional Transport Coordination Centre (RTCC).
- In promoting and implementing Smarter Choice measures, there is no reference to micromobility (including scooters and ebikes), Demand Responsive Transport and the use of mobility as a service (MaaS) products and mobility credits. These shared transport services could play a key role in the early phasing stages of new development.
- The growth of innovation and digital investment in transport is also playing a significant role in the region and we would welcome acknowledgment of this within all new development. As the West Midlands is benefiting from its Future Transport Zone, we believe all new development proposed should be designed to enable the installation of the most up-to-date digital connectivity and transport innovation measures.
- The importance of good interchange facilities, across all modes for new development should also be referenced in this section.
- Whilst we fully agree with the 7 principles outlined in this policy for walking and cycling, we feel this could be strengthened further, especially in light of the pandemic and the active travel fund measures being rolled out.

	<p>Under point 1 especially, in terms of ‘maintaining a comprehensive cycle network’ this should include the words ‘safe and convenient network’.</p> <ul style="list-style-type: none"> <li>• The Metropolitan Cycle Network originally identified in LTP4: Movement for Growth is now known as the Starley Network. Stronger reference to the Starley Network should therefore be made together with the West Midlands Regional Walking and Cycling Strategy. Any cycling provision proposed within the plan should connect fully to all existing routes and these should be of high quality and designed to meet guidance set out by LTN 1/20 and the West Midlands Cycle Design Guidance under the Development and Places for People section.</li> <li>• New developments should not only have good walking and cycling links to public transport nodes and interchanges (as stated in point 4 of the policy) but have excellent links to all local amenities and services and be of mixed use and higher density (where possible) to help make the provision of sustainable transport economically viable and reduce the overall demand to travel, as stated under policy 4 &amp; 6.</li> <li>• The reallocation of road space for cyclists should also be included under this policy, covering cycle lanes and pavement widening together with the importance of active travel behaviour change programmes such as TfWM’s community engagement programmes for active travel and that of its partners including School Streets and Low Traffic Neighbourhoods. Considering 20mph on all residential roads is also promoted in our West Midlands Cycle Design Guidance and TfWM’s Developer Guide, and we would welcome a 20mph policy for residential areas.</li> <li>• Finally, reference to the new West Midlands Cycle Hire scheme and the Interconnect West Midlands; the regions wayfinding system would be strongly welcomed.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Creating cycle routes that are separate from other road users should be a priority, indeed completely separate cycle only roads mirroring the trunk routes should be the ideal goal, primarily for the safety of cyclists.</li> </ul>
<p>TRAN5 &amp; TRAN6</p>	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Generically agree with the need for a better connected, greener, sustainable transport system as set out in the paragraphs and policies of section 9, and the transformation to lower carbon, healthier transport options. In terms of the Geopark and connecting its many natural and cultural assets to public transport and healthy travel we particularly support policy TRAN 5 and feel that perhaps the strategic importance of heritage</li> </ul>



	locations should be specifically referenced in TRAN 6 as the visitor economy and access to areas of special character may influence travel choices.
TRAN6	<b>Resident</b> <ul style="list-style-type: none"> <li>• There should be estate buses, smaller more local buses to enable people to get to main bus routes or to local shops.</li> <li>• Ring and ride should be much better financed for elderly or disabled people to enable them to get to where they need to go to see other people, the doctors and shopping or to enable them to work.</li> </ul>
	<b>Resident</b> <ul style="list-style-type: none"> <li>• Development proposals should prioritise Streets that enable walking and cycling.</li> </ul>
	<b>Resident</b> <ul style="list-style-type: none"> <li>• Policy TRAN6 is there any information available on where the sites for new park and rides are likely to be?</li> </ul>
	<b>Resident</b> <ul style="list-style-type: none"> <li>• Sustainable travel should be promoted within developments and throughout Dudley where possible.</li> </ul>
	<b>Resident</b> <ul style="list-style-type: none"> <li>• The provision of secure, adequate Park &amp; Ride facilities would make Public Transport an option for people who otherwise would not use it. However, reliability would need to be improved first.</li> </ul>
	<b>Resident</b> <ul style="list-style-type: none"> <li>• Justification should state 'Prioritisation of re-allocation of road space.</li> </ul>
TRAN7	<b>Stakeholder</b> <ul style="list-style-type: none"> <li>• All houses/bungalows should have a drive so that car charging can be done safely for pedestrians on pavements. These drives could be at the rear or the front but parking for two vehicles would be advised including with terraces houses.</li> <li>• Of terraced housing is to be built and there is no drive, a car park should be built with allocated 2 spaces per house.</li> <li>• All flats should have adequate 'off road' parking.</li> <li>• Additional car parking for roads with only terraced houses on, should be allocated a designated 'off road' parking area to prevent a) individuals from breaking the law by trailing electric car charging cables across the pavement making these a trip hazard to all or preventing disabled people particularly those in wheelchair, scooters or walking aids from being able to travel safely and without obstruction along our pavements.</li> </ul>

	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Sets out that maximum parking standards for each of the Black Country Authorities will be enforced through supplementary planning documents. This approach is not supported by Taylor Wimpey. Any parking standards should be defined within the Plan to allow their appropriateness to be robustly tested at examination.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Draft Policy TRAN7 (Parking Management) identifies that the Black Country Authorities will ensure a consistent approach to maximum parking standards is enforced in new developments, as set out in supplementary planning documents. We are supportive of this policy in principle,</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Quick parking management win - ban all parking on Stourbridge High Street and pedestrianised.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• TfWM has responsibility for Park and Ride sites, certain electric vehicle charging infrastructure and some cycle parking provision. As part of wider policy and demand management measures, to restrain car usage and increase sustainable modes, we see car parking management measures being vital.</li> <li>• The current WM LTP4, Movement for Growth sets out a need for a metropolitan parking strategy to balance the role of car access to centres to support economic vitality, whilst promoting the use of sustainable travel. This is to ensure that private car volumes are not at such levels where the dominance of the car detracts from the quality of our centres.</li> <li>• Based on this, we welcome many of the points made under policy TRAN7, however the importance of good quality parking needs to be presented too. From TfWM's LTP evidence review into parking, the 'whole quality parking experience' including how parking interconnects with other transport modes is seen as extremely important. And where 'mobility hub' style options are available with pop up shops, distribution lockers, ZEV charging opportunities and food outlets alongside standard car parks and sustainable transport options, these are welcomed, and have helped reduced the impact of parking in other towns and cities.</li> <li>• From our LTP evidence base research, we also know that only 20% of trips into centres are for commuting purposes with the remainder being for retail and leisure. There is also limited evidence to suggest that parking charges act as a deterrent to shopping trips, and its good quality pedestrian measures and investment in traffic reduction and public realm which increases retail footfall and makes the greatest impact on local high</li> </ul>

street economies, and we would be happy to share our evidence in this area, to help shape further the parking policies within the plan.

- The NPPF also echoes this by stating “that local authorities should consider an area’s accessibility, type, mix and use of development, availability of public transport, local car ownership levels ... when setting local parking standards”.
- Based on this, paragraph 9.61 should be altered to read: “The management of car parking is fundamental to achieving the Vision for sustainable communities, environmental transformation and economic prosperity. It also has a key role in helping to reduce the overall level of private vehicle trips with obvious benefits for congestion, road safety, air quality and carbon emissions”.
- Under policy TRAN7 1a, concerning parking measures between centres, we feel the decision to not include Brierley Hill (Merry Hill) within the parking policy for charging across strategic centres is a serious omission. It should be noted that the WMCA (underwritten by Dudley MBC and the other West Midlands constituent authorities) are investing many millions of pounds into improving public transport connectivity across the Black Country, including the Wednesbury to Brierley Hill Midland Metro Extension. To support this investment, substantial funding has been raised by loans which are linked to increased use of the Midland Metro (as part of its extension). This policy as drafted, has potential to create challenges with regards to the jointly targeted strategic outcomes of increased public transport usage as an alternative to single occupancy car usage.
- Under more general comments now, there is no policy reference to parking facility / kerb side management requirements for freight, servicing and logistics, for ZEV charging points, for pick-up/drop off points for taxis, car club schemes, coaches and bus layover points, for powered two wheelers and cycle parking or parking for disabled people. Hence, policy TRAN7 could be expanded upon, to cover wider parking matters including:
  - Promoting car free developments in those most accessible locations where excellent public transport is available.
  - Introducing permit parking schemes for new developments.
  - Ensuring adequate parking provision for disabled car drivers and passengers.
  - Full consideration of ZEV charging infrastructure and parking, together with spaces for ZEV car clubs
  - – covering both off street and on street public parking provision.

	<ul style="list-style-type: none"> <li>○ The need for all future stations/interchanges/mobility hubs to be designed with restrictive car parking and full promotion of sustainable options for onward journeys, including cycle hire facilities/bus connections.</li> <li>○ Incorporating secure and covered cycle parking to meet long-term demand from occupiers and visitors, in convenient locations to maximise usage, together with consideration of showers, changing facilities, lockers and bike hire scheme parking.</li> <li>○ Adequate provision of designated pick-up/drop-off points for taxis, demand-responsive transport services and car clubs etc.</li> <li>○ Adequate parking and docking facilities for scooters.</li> <li>○ Endorsing mobility credits as incentives to new residents to give up parking spaces, with usage of spaces being kept under review.</li> <li>○ Making appropriate parking provision for deliveries and servicing (including the requirement of Delivery and Servicing Plans for appropriate developments) to help meet road safety requirements, transport emissions and other environmental impact standards and reduce repeat deliveries.</li> <li>○ Promoting controlled parking zones around schools and early years' settings.</li> </ul> <ul style="list-style-type: none"> <li>● In addition to the above bullet points, consideration should be given to further measures to help manage the overall demand for travel such as the expansion of Controlled Parking Zones, greater use of Traffic Regulation Orders and the role out of permit schemes.</li> <li>● Also, where car parks are under-utilised, changes in land uses could be explored including replacing parking provision with mobility hubs, and be adapted to reflect demand, and we have seen this as a policy in other local plans across the region and beyond. Also, any policies which restrict the proliferation of 'bomb site' car parks on vacant land would further be welcomed.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>● Draft Policy TRAN7 (Parking Management) identifies that the Black Country Authorities will ensure a consistent approach to maximum parking standards is enforced in new developments, as set out in supplementary planning documents.</li> <li>● Whilst it is considered important to promote sustainable transport methods as part of new developments, the provision of parking is critical to the success of logistics schemes. Indeed, where a logistics development is in operation for 24-hours a day, it can mean a shift change takes place overnight where public transport is either limited or not available.</li> </ul>

	<ul style="list-style-type: none"> <li>We would therefore recommend that draft Policy TRAN7 is amended to confirm that maximum parking standards would not relate to logistics developments.</li> </ul>
TRAN8	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Each housing unit built either single unit or multiple units, houses, or flats/apartments should have parking with electric car charging points.</li> <li>Flats should have at least one allocated 'off road' parking space with an electrical car charging facility in view of the incoming requirement to move to carbon free proposals for transport and the fact that it is illegal to trail a charging lead across a public highway of which included a pavement.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Policy TRAN8 (Planning for Low Emission Vehicles) requires developments to include 'adequate provision' for charging infrastructure. Whilst Taylor Wimpey is supportive of the transition towards electric vehicles (EVs) and the provision of EV infrastructure, it is considered that 'adequate provision' is vague and not clear and therefore does not accord with the requirements of Paragraph 16 d of the NPPF ("Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals."). If it is the expectation that all development should include EV charging infrastructure, then Policy TRAN8 should be explicit that that is the case.</li> <li>The Viability and Delivery Study does not appear to apply any cost to this policy requirement but does cover electric vehicle charging points under Policy CC4. It notes that the current policy is for one electric vehicle charging point required for each home, where feasible and viable, as set out in Black Country Air Quality SPD and states: "For the purposes of our viability assessment, we have included £800 per unit for EV charging (and £5,000 for a multi-charging point for every 4 x flats). This is based on the Wolverhampton average cost".</li> <li>Typically, the provision of car charging points will require higher voltage cabling to be installed throughout the site, resulting in higher on-site infrastructure costs. The policy requirement as drafted is also onerous given that there can be varying requirements for the provision of car charging points across developments with some LPAs requiring the necessary infrastructure to be in place and others to deliver the actual charging point.</li> <li>It is also possible that capacity for such voltage will not be available on the current network and therefore the costs to upgrade the network can be significant, requiring on site substations or off-site primary substation</li> </ul>

upgrades. These costs are extremely difficult to quantify and can exceed hundreds of thousands of pounds dependent on site size and current service capacity.

- This scenario is untested in the Viability and Delivery Study and should be considered further, particularly as the expectation to have usable and fit for purpose EVCPs is going to increase.
- We also understand that the Government is proposing to introduce requirements for charging points under Schedule 1 to the Building Regulations 2010, which are expected to come into force in 2022. This will introduce a nationwide standardised approach to the provision of charging points in new buildings. It is therefore questionable whether this Policy is required as it will duplicate national policy. It is also considered that the £800 per unit under-estimates the actual
- cost for providing a charging point. The Government Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £1,000 per EVCP plus an automatic levy for upgrading networks capped at £3,600.
- The Government's intention is to ensure that the introduction of this requirement does not add such a burden on developers that certain developments become unviable.

**Developer**

- Draft Policy TRAN8, proposals for low emission vehicles will be supported by “ensuring that new developments include adequate provision for charging infrastructure e.g., electric vehicle charging points in car parks...”
- As set out in the Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019), the Government's preferred option is the introduction of a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country and supersede the BCA's policy approach.
- Until the introduction of proposed changes to Part S of the Building Regulations, Investin considers that the physical installation of active EVCPs is inappropriate, as a passive cable and duct approach means that householders can later arrange and install an active EVCP of their choice.

	<ul style="list-style-type: none"> <li>• NPPF paragraph 16d states that policies should be “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.” The policy should therefore be clearer in specifying if adequate provision for charging infrastructure is a requirement for a passive cable and duct approach or installation of active EVCPs.</li> <li>• Draft Policy TRAN8 is unsound because it fails the four tests of soundness as per NPPF paragraph 35 as it is not positively prepared, justified, effective and consistent with national policy</li> </ul>
	<p><b>Planning Agent</b></p> <ul style="list-style-type: none"> <li>• Part A of draft Policy TRAN8 (Planning for Low Emission Vehicles) requires “that new developments include adequate provision for charging infrastructure e.g., electric vehicle charging points in car parks, measures to encourage LEV use through travel plans and other initiatives”. We agree that adequate provision should be made for low emission vehicles, as per paragraph 107 of the NPPF.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>• Must be sufficient off-road charging points for EV. Avoid cables across pavements.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Draft Policy TRAN8 sets out how proposals for low emission vehicles will be supported. Whilst we are supportive of the principle of encouraging low emission vehicle use and providing infrastructure to facilitate this, it is considered that the current policy wording is too vague, particularly in relation to the provision of charging infrastructure. Paragraph 16d) of the NPPF states that Plans should contain policies that are unambiguous. Part a) of the Policy states that “adequate” provision for charging infrastructure should be provided as part of new developments, however it is not clear what is meant by this, as there is no indication / guidance as to what may be considered adequate. Without knowing what infrastructure may be required to be provided as part of new developments in relation to charging infrastructure, the viability implications cannot be fully understood. The Council should ensure that all of the anticipated development costs associated with all of the draft policies of the BCP have been taken into account, as required by National Policy. It is therefore considered that in order to ensure that the policy is realistic and deliverable, it should be amended to be more explicit in terms of what infrastructure will be expected to be delivered.</li> </ul>
	<p><b>Developer</b></p>

	<ul style="list-style-type: none"> <li>• Draft Policy TRAN8, proposals for low emission vehicles will be supported by “ensuring that new developments include adequate provision for charging infrastructure e.g., electric vehicle charging points in car parks...”</li> <li>• As set out in the Department of Transport consultation on Electric Vehicle Charging in Residential &amp; Non-Residential Buildings (ended on 7th October 2019), the Government's preferred option is the introduction of a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country and supersede the BCA’s policy approach.</li> <li>• Until the introduction of proposed changes to Part S of the Building Regulations, St Philips considers that the physical installation of active EVCPs is inappropriate, as a passive cable and duct approach means that householders can later arrange and install an active EVCP of their choice.</li> <li>• NPPF paragraph 16d states that policies should be “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.” The policy should therefore be clearer in specifying if adequate provision for charging infrastructure is a requirement for a passive cable and duct approach or installation of active EVCPs.</li> <li>• Draft Policy TRAN8 is unsound because it fails the four tests of soundness as per NPPF paragraph 35 as it is not positively prepared, justified, effective and consistent with national policy.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• LEV’s should be changed to ZEV’s.</li> <li>• We fully support this policy, but consideration of ZEV charging of public transport infrastructure may also be required for new developments. As part of the BSIP, by 2030, we aim to have nearly 90% of our regions 2,000 strong bus fleet zero emission.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Supports electric vehicle charging points in principle.</li> </ul>
	<p><b>Developer</b></p>



	<ul style="list-style-type: none"> <li>The additional loading created by car charging infrastructure is significant and it is essential that the Black Country Authorities liaise with electricity providers as part of the Black Country Plan process so that the implications in terms of network capacity can be understood and planned for. It cannot be left to individual developers to pick up the cost of what could be multi-million-pound upgrades to the Black Country's electricity infrastructure.</li> </ul>
	<p><b>Planning Agent on behalf of Landowner and Developers</b></p> <ul style="list-style-type: none"> <li>This policy requires that new developments should include adequate provision for charging infrastructure but there are no specific requirements noted. However, the Viability and Delivery Study (May 2021) has assumed £800 per dwelling for electric vehicle charging points therefore clarity is sought on whether a specific percentage of electric charging points are being sought on sites. The policy should only require provision of infrastructure to fit EV points rather than the points themselves and should include reference to 'where possible' given there may be viability or practicality constraints.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Policy TRAN8 states that proposals for low emissions vehicles will be supported by ensuring that new developments "include adequate provision for charging infrastructure e.g., electric vehicle charging points in car parks, measures to encourage LEV use through travel plans and other initiatives."</li> <li>Whilst the intention of this policy is recognised, it is considered more suitable for any requirement for electric vehicle charging points to be left to future updates to the Government's Building Regulations, and for the policy to refer to that. Indeed, the Government's 'Electric Vehicle Charging in Residential &amp; Non-Residential Buildings' consultation set out the Government's intention to implement a nationally standardised approach to EV charging through a new functional requirement under Schedule 1 to the Building Regulations 2010, with further guidance expected in late 2021. As such, Policy TRAN8 should not seek to pre-empt those requirements, which would be contrary to the Government's desire to create a rationalised, streamlined system led by the Building Regulations rather than local requirements.</li> <li>With that said, should Policy TRAN8 continue to pursue a policy requirement in relation to electric charging provision rather than referring to the Building Regulations, it is important that the policy clearly specifies what that requirement is (expressed as a percentage of dwellings) based upon evidence of need and reflective of current uptake. Should that approach be taken, the level of charging provision should be taken into account in</li> </ul>

a Viability Assessment that demonstrates that “the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Ref. 10-002-20190509). That assessment should take into account that electric vehicle charging can often be costly; particularly where residential plots are served by remote parking or where additional capacity is required in the local electricity grid to accommodate charging points. That matter should be considered carefully by the BCAs should they pursue a requirement.

**Developer**

- Policy TRAN8 states that proposals for low emission vehicles will be supported by ensuring that new developments include adequate provision for charging infrastructure.
- The Viability and Delivery Study does not appear to apply any cost to this policy requirement but does cover electric vehicle charging points under Policy CC4. It notes that the current policy is for one electric vehicle charging point required for each home, where feasible and viable, as set out in Black Country Air Quality SPD and states: “For the purposes of our viability assessment, we have included £800 per unit for EV charging (and £5,000 for a multi-charging point for every 4 x flats). This is based on the Wolverhampton average cost”.
- Typically, the provision of car charging points will require higher voltage cabling to be installed throughout the site, resulting in higher on-site infrastructure costs. The policy requirement as drafted is also onerous given that there can be varying requirements for the provision of car charging points across developments with some LPAs requiring the necessary infrastructure to be in place and others to deliver the actual charging point.
- It is also possible that capacity for such voltage will not be available on the current network and therefore the costs to upgrade the network can be significant, requiring on site substations or off-site primary substation upgrades. These costs are extremely difficult to quantify and can exceed hundreds of thousands of pounds dependent on site size and current service capacity. This scenario is untested in the Viability and Delivery Study and should be considered further, particularly as the expectation to have usable and fit for purpose EVCPs is going to increase.
- We also understand that the Government is proposing to introduce requirements for charging points under Schedule 1 to the Building Regulations 2010, which are expected to come into force in 2022. This will introduce a nationwide standardised approach to the provision of charging points in new buildings. It is therefore questionable whether this Policy is required as it will duplicate national policy. It is also considered that the £800 per unit under-estimates the actual cost for providing a charging point. The Government Electric

	<p>Vehicle Charging in Residential &amp; Non-Residential Buildings consultation estimated a cost of £1,000 per EVCP plus an automatic levy for upgrading networks capped at £3,600.</p> <ul style="list-style-type: none"> <li>The Government's intention is to ensure that the introduction of this requirement does not add such a burden on developers that certain developments become unviable.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Supports the scope of Policy TRAN8 and recognises the importance of a low carbon future, BHL are aware that the Government is seeking to introduce a new requirement for EVCP's under Part S of the Building Regulations, which will inevitably supersede BCA's policy approach.</li> <li>Moreover, BHL requests an explanation on what is meant by "adequate provision". In accordance with NPPF paragraph 16d, a policy should be "clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". If this policy is to be included in the BCP, it needs to modify to ensure that it is measurable to ensure consistency between planning applications and allow developers to take into account the implication of the requirement on scheme viability.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Support, but there should be a firm and explicit commitment to support LEV through provision of charging points on residential public roads, either through dedicated charging points or adapting lampposts for example, which is being done in other parts of the UK. Could offer reserved parking on residential streets for EVs.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Draft Policy TRAN8 (Planning for Low Emission Vehicles) lacks clarity in this regard. Consequently, L&amp;Q Estates seek clarification that new parking standards are being developed which will replace the Walsall Council Parking Strategy (2008) and would welcome the opportunity to consult on this, where appropriate.</li> </ul>
	<p><b>Planning Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>This policy seeks to ensure that new developments include adequate provision for charging infrastructure e.g., electric vehicle charging points in car parks, measures to encourage LEV use through travel plans and other initiatives.</li> <li>Our client supports the provision of electric vehicle charging points in principle, but has significant concerns about the practicalities of delivery, in light of wider infrastructure constraints. The additional loading created by car charging infrastructure is significant and it is essential that the Black Country Authorities liaise with</li> </ul>

	<p>electricity providers as part of the Black Country Plan process so that the implications in terms of network capacity can be understood and planned for. It cannot be left to individual developers to pick up the cost of what could be multi-million-pound upgrades to the Black Country's electricity infrastructure.</p> <ul style="list-style-type: none"><li>• It will also be important for the policy wording to maintain some flexibility so that in cases where the provision of such infrastructure would make a scheme unviable, an exception can be made.</li></ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"><li>• Monitoring needs to be established to ensure the policy objectives are met and the changes are made to implementation if they are not.</li></ul>

10)Environmental Transformation and Climate Change			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
ENV1	7	17	38
ENV2	3	7	9
ENV3	12	12	29
ENV4	12	15	19
ENV5	16	4	17
ENV6	4	0	3
ENV7	8	1	14
ENV8	9	5	18
ENV9	8	12	19
CC1	5	3	15
CC2	4	12	13
CC3	2	0	2
CC4	3	4	10
CC5	5	4	21
CC6	3	2	5
CC7	6	9	15

Policy, Proposal or Main Heading	Key Issues Raised by the Representations (type of respondents which raised these issues highlighted in bold)
ENV1	<p><b>Statutory Consultees</b></p> <ul style="list-style-type: none"> <li>Add wording to state the process of Local Sites Selection through the LSP to the justification</li> </ul>
ENV3	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>Policy not consistent with national policy as it requires all development to deliver a minimum 10% net gain in biodiversity value when measured against baseline site information. The NPPF places no requirement on development proposals to deliver a notional target of a 10% net gain.</li> </ul>

- The approach in the plan is trying to predict a policy context which is at the early stages of development and when the ultimate policy context may be significantly different. More appropriate response would be for the Plan to follow the policy context set out in the NPPF.
- Policy should not prejudice delivery of affordable housing, should be limited to 10% net gain and guidance on how to achieve it should be signposted.
- Re 10% BNG - request that the words “a minimum” are deleted from Policy ENV3.
- Government will introduce exemptions applicable to the most constrained types of development which will be set out in secondary legislation and as such, the use of “all development” is premature.
- The Councils should be aware of the cost implications that Biodiversity Net Gain can have on an otherwise viable scheme. It can result in lower unit numbers or the requirement to acquire additional land for off-setting, which can come at a great cost to a developer. Therefore, the Policy should provide some flexibility.
- Concerns regarding the ability of development to achieve 10% when balanced against other competing needs of the plan (affordable housing, planning obligations and densities) and the practicalities of delivering 10% in relation to residential development within urban areas.
- This is a new requirement and will see the amount of land needed to achieve this increase. This will be true on brownfield and greenfield sites, with brownfields sites often being quite interesting from an ecological perspective for all manner of reasons. This also questions whether the 80% net area assumption is sound.
- Supports the principal of net gain and the 10% target which will shortly be mandated nationally. It also supports the principal of calculating net gain using the national Biodiversity Metric, to ensure a consistency of approach between Local Authorities.
- The policy should be updated to make specific reference to the BNG Metric.
- Part 2 and 3 of the policy duplicates the provisions of the emerging Environment Bill. Once the Bill is adopted it will require 10% biodiversity net gain. Dual regulatory control is inappropriate. As such parts 2 and 3 of the policy should be removed.
- We consider that Point 7 should refer to “where viable” regarding providing compensation prior to development.
- Policy states that off-site compensation is only to be accepted in “exceptional circumstances.” That is too high of a threshold for such a policy - further guidance in relation to the mechanism for delivering biodiversity compensation should be included in the policy or supporting text to provide developers with certainty on that process

**Stakeholder, Developer and Resident**

	<ul style="list-style-type: none"> <li>• The Draft Local Nature Recovery Opportunity Map and components description (published as Appendix 18 in the BCP) should be added to the list of Primary Evidence.</li> <li>• Map produced at Appendix 18 is of such a small scale (1:125,000) as to make it unusable for many specific sites. Some of the strategies depicted by the mapping itself are difficult to understand.</li> <li>• Much of the evidence has not yet been published - this remains an untested map produced by the Wildlife Trust for Birmingham and the Black Country and the local Environmental Records Centre. This is not a sufficient basis for what could be a significant Plan policy which has ramifications for strategic and local development.</li> <li>• Clarity is required on what 'measured against baseline site information' means.</li> <li>• Clarity is sought on the requirements for 'Core Expansion Zones'.</li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• Not all sites may be able to provide BNG on-site. The BCA should use proportionality in their application of planning policy. Sites without reasonable biodiversity net gain opportunities should not face risks of delay through rigid or prescriptive requirements - policy approach to BNG should include provision for off-site contributions to mitigation, where this is appropriate and required.</li> <li>• Consideration should be given to identifying a comprehensive package of strategically located habitat banks across the BCP area. Without this, it will be difficult for developments that require off-site mitigation to deliver it and therefore could adversely impact deliverability of some sites.</li> <li>• Whilst the policy states that provision on site is preferred, it does not define what is meant by 'practicable.' Does this mean in terms of viability / land-take or the ability for land to be managed and maintained for the long-term?</li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• No information is given in terms of potential costs associated with an off-site contribution to sites within the local area. This will be required for developers to consider on and off-site options and to help inform negotiations on development values with landowners.</li> <li>• Part 7 states that compensation will only be accepted in exceptional circumstances and should be provided prior to development. The provision of compensation prior to development is not likely to be practicable in all instances as it may be necessary to use receipts from the sale of dwellings on the site to fund this compensation. A better approach would be to allow for the timing of payments to be secured through legal agreements and the policy wording should be amended to allow for this approach.</li> </ul>
	<p><b>Stakeholder</b></p>

	<ul style="list-style-type: none"> <li>• Advise including Natural England’s Midlands Heathland Heartland partnership and the Purple Horizons Nature Recovery Project within the policy. This project aims to create, enhance and connect fragmented heathland habitat and other wildlife rich habitats between Cannock Chase and Sutton Park</li> <li>• Policy should clarify that biodiversity net gain is not applied to irreplaceable habitats.</li> <li>• Policy should clarify that any mitigation and/or compensation requirements for European sites should be dealt with separately from biodiversity net gain provision.</li> <li>• Policy should set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme.</li> <li>• Policy should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development, which should be as specific as possible to help build an evidence base for future reviews of the plan; e.g. the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.</li> <li>• Please note that Biodiversity Metric 3.0 is now available and replaces the beta Biodiversity Metric 2.0 published in 2019. We would advise updating the policy accordingly.</li> </ul>
	<p><b>Site Promoter</b></p> <ul style="list-style-type: none"> <li>• Suggest site available for use as BNG receptor – for allocation in BCP</li> </ul>
	<p><b>Stakeholder Group</b></p> <ul style="list-style-type: none"> <li>• paragraph 4 - an implied assumption that developments will always have a negative impact on the Nature Recovery Network and/or Biodiversity. In respect of canal restoration, highly likely that the development will have a positive impact. Thus, propose amendments to paragraph 4 to ‘Development that is likely to have a negative impact on biodiversity and/or on nature connectivity will be considered in accordance with the mitigation hierarchy set out in the NPPF’.</li> <li>• Prefer to see a minimum of 20% net gain, in order to ensure that significant benefits for wildlife are delivered by all developments.</li> </ul>
ENV4	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Aware that Ash dieback disease is beginning to take hold in parts of the Black Country where significant stands of Ash trees are present. Important to have a bullet point that relates to such natural factors that may result in significant changes in tree cover, that whilst not development or refurbishment consequences per se, can significantly affect landscape character.</li> <li>• Can some reference be made to the Black Country Urban Forest? These trees are now over 20 years old and in need of management. These trees contribute significantly to the BC landscape and should not be destroyed in</li> </ul>



pursuit of development sites. If these sites are under threat, then appropriate mitigation nearby needs to be found.

**Stakeholder**

- Support provision of an appropriate landscaping buffer adjacent to ancient woodland and hedgerows on development sites but request a minimum depth of 25m be required - only in exceptional circumstances would a buffer of less than 50m be permitted.
- Developments adjacent to ancient woodland should be orientated to face them to reduce negative impacts associated with proximity to residential developments such as the introduction of non-native plant species.
- Request that the evidence used to calculate the target increase in canopy cover to at least 18% over the plan period is published in the BCP.
- Request wording changes to reflect and reinforce the evidence provided by the Draft Local Nature Recovery Strategy, recognising that tree planting is often not the most ecologically appropriate action.
- Ecosystem services evidence should be produced and followed in order to maximise the benefits of tree planting for biodiversity and climate change mitigation by ensuring this is undertaken in the most appropriate locations.
- Support the recognition of the value of large, canopied street trees and that the planting of these should be included in all new residential developments and other significant proposals. This should go further - should encourage the planting of new street trees in existing residential and employment areas to maximise the wide range of health, biodiversity and climate change mitigation and adaptation benefits.
- The opportunity to fund the retrofitting of street trees through Biodiversity Net Gain contributions should be explored, especially as this is expected to provide resources to manage these for a period of 30 years.
- Support the minimum contribution of 20% canopy cover across the development site and a recommended contribution of 30% canopy cover across the development site in new developments but should be caveated to state that this will not be required if it would lead to damage or loss of existing habitats of value.
- Off-site street trees of large-canopied species should be added to the options for delivering compensation.
- Request that replacement hedgerows should be of a suitable diverse mix of locally sourced native species, and that a resourced maintenance and management programme will be required that will include the replacement of plants that fail within a specified period by plants of a suitable size, species and quality.
- Suggest that paragraph 1 is split and the text specifically about ancient woodland is a separate paragraph.
- Advise BCA to expand on the buffers, explaining that the size of the buffer will depend on the type of the development proposed and the type of the woodland / tree.

- Include reference to heritage assets and the historic landscape, to ensure that appropriate design and species are chosen to complement/ enhance the historic environment and that consideration is given to ensure there is no harm for the historic environment or heritage landscapes.
- recommend a minimum buffer around ancient woodland of 50metres and more in some circumstances.
- advocate a minimum of 30% canopy cover in order to maximise the impact that new trees and woods can have in tackling both the climate and biodiversity emergencies. Concern about two-tier approach - councils in determining planning applications may go for the “easier” option of 20% tree canopy cover.

**Developers**

- Policy is contrary to the NPPF paragraph 180c.
- Policy should not seek to protect all trees on a site and lower quality trees should not be afforded the same weight as a veteran or Category A tree.
- Site constraints / layout should also be noted as potential reason for removal subject to replacement planting.
- Part 5 - guidance on the use of TPO’s is set out in the National Planning Practice Guidance. It should not be repeated in Local Planning policies.
- Part 6 conflicts with the aims of Part 3 within the same policy, which specifically requires replacement tree planting to compensate for any trees removed, as opposed to assessing the wider opportunities for biodiversity net gain. Therefore, further clarification is required in relation to which part of Draft Policy ENV4 would be applicable to strategic allocations.
- Criterion 12 states that development proposals should use large canopy species where possible. This will often cause conflict with Highway Authorities, where they be located along new streets. Highway authorities often reluctant to adopt street trees on developments.
- Policy refers to 20% canopy cover and a ‘recommended’ contribution of 30% canopy cover across a development site. Such an approach would have a significant impact on the capacity of development sites. Figures are arbitrary and unjustified.
- Should be amended to confirm that minimum canopy cover contribution can be reduced subject to viability considerations or confirm that the Black Country Authorities would accept tree planting in an appropriate off-site location.
- How will canopy cover be calculated?
- 20% canopy cover should be provided “where practical” and the policy amended accordingly.

- Criterion 14 refers to new houses and buildings being carefully designed to avoid shade cast by both existing and new trees. As creating shade with trees is one response to climate change and combating the urban heat island effect, the inclusion of this criterion needs further clarification and justification.
- Part 15 suggests that the positioning of trees in relation to streets and buildings should not worsen air quality for people using and living in them by allowing street level ventilation to occur. It is not clear how this could be accurately assessed or achieved in practice - do not consider it would be effective.
- Criterion 18 refers to trees proposed for removal during development being replaced at a ratio of at least 3 trees for 1 removed tree. It goes on to state the size and number of replacement trees would be commensurate with the size, stature, rarity and amenity of the tree to be removed. This approach is unreasonable, not justified by evidence and does not properly consider the practicalities of providing replacement trees particularly when larger specimens can be difficult to establish.
- Reduce the requirement for additional tree planting in urban areas.
- Include an allowance for tree planting, green walls/roofs in the Local Plan Viability Assessment.
- Criterion 22 refers to utilisation of planning conditions to require an arboricultural Clerk of Works being required on sites where development will potentially impact on trees. It is unclear how this requirement will be enforced on the ground.
- Criterion 23 states a presumption will be applied to replacement trees being from the UK and Ireland to negate the spread of tree pests and diseases whilst supporting regional nurseries. The evidence base for this requirement is questioned. Similarly, it is difficult to understand how this would be enforced via planning conditions or through a planning permission. It could also mean trees are difficult to resource in the planting season.
- Criterion 24 states there will be a presumption against the wholesale removal of hedgerows for development purposes. Support the principle that established hedgerows should be protected in development proposals. However, particularly when dealing with greenfield sites it is inevitable that some hedgerows will need to be removed to facilitate other requirements such as access, circulation routes, drainages etc and the policy should be amended to reflect that there are occasions where hedgerows can legitimately be removed to secure other planning objectives.
- Criterion 27 states new hedgerows would be sought as part of site layouts and landscaping schemes. This should be revised to reflect differing circumstances within the Black Country whereby it would not be appropriate to plant a hedge in every case, particularly in urban/town centre locations.
- Policy should be rationalised in order to be more clearly written and consistent with National Policy, and to serve a clear purpose.

	<ul style="list-style-type: none"> <li>• The level of detail proposed within Policy ENV4 is considered to be unnecessary and inappropriate and there are provisions within the policy that area already covered by best practice guidance and / or other regulations.</li> <li>• Suggests that guidance be included in a Design Supplementary Planning Document (SPD) or an appendix to the plan. Indeed, that would align with the Government’s PPG on plan-making that specifies that SPDs “should build upon and provide more detailed advice or guidance on policies in an adopted local plan.”</li> </ul> <p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• Tree planting may not be the most ecologically appropriate form of habitat creation for a location - the choice should be informed by survey work and by landscape scale planning and tree planting is not the same as woodland creation.</li> <li>• The inclusion of planting of large-canopied street trees should go further and encourage the planting of new street trees in existing residential and employment areas.</li> <li>• New hedgerows should be diverse and appropriate species used when planted and hedges should be given a 50m buffer for protection.</li> </ul>
ENV6	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Consider deleting ‘where possible’ in clause 1.</li> </ul> <p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Would be useful for the boundaries of the Black Country UNESCO Global Geopark to be defined within the policy’s supporting text.</li> </ul>
ENV9	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• not appropriate for a Development Plan Policy to reiterate requirements in other legislation.</li> <li>• Paragraph 10.16 to 10.18 - A list of design considerations from ENV9 are challenged on the basis they are outside of planning legislation.</li> <li>• Policy appears to be a duplication of the criteria contained in draft policy CSP4 and can be most appropriately dealt with by way of the production of a Local Design Guide for the Black Country aligning with the Governments’ recent amendments to the NPPF. As such it is not necessary.</li> <li>• Part 2 of the policy would benefit from further clarification either within the policy text itself or the justification text and it may be worthwhile for a design guide to be prepared as part of the BCP which reflects local character and design preferences and would provide more specific guidance to developers on design requirements.</li> </ul>

	<ul style="list-style-type: none"> <li>Concerns are raised in terms of Local Authorities adhering to Manual for Street principles in relation to the adoption of highways. There needs to be a step change in relation to the approach to development layouts from Highway Authorities if this to be achieved.</li> <li>Part 5 of the policy refers to 'greening' of the Black Country. This term is not precise. Whilst it generally refers to undertaking or incorporating sustainability measures in order to try and reduce the environmental impact of development it is not clear how can this be measured or assessed.</li> <li>the use of Building for a Healthy Life should remain voluntary rather than becoming a policy requirement.</li> </ul>
	<p><b>Developer and Stakeholder</b></p> <ul style="list-style-type: none"> <li>concerned with reference to Secure by Design included at Part 1) d) of Policy, as Secure by Design guidance encourages cul-de-sacs and discourages permeability which is at odds with all other design guidance.</li> <li>requests that reference is made within Justification paragraph 10.134, to the need for developers, as well as the local authorities, to engage with the West Midlands Police Design Out Crime Officers (DOCO) at the pre-application as well as the planning application stage.</li> <li>considers the policy does not go far enough as it does not have a requirement for Secured by Design principles and Park Mark to be incorporated into development proposals. suggests rewording: <i>'2) Development will be designed to the highest possible standards, creating a strong sense of place. Development proposals must address as appropriate:...</i></li> <li><i>f) the need to ensure crime prevention measures and Secured by Design and Park Mark principles are incorporated to reduce crime, the fear of crime and anti-social behaviour.'</i></li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>references to compliance with the Building Regulations at parts 1d) and 3) of policy are superfluous and should be removed. There is no need for planning policy to direct compliance with separate legislation.</li> <li>Objection is raised to policy replicating Building Regulation requirements in relation to water efficiency. This should not be insisted upon at the planning stage where design SAP calculations are not possible until the technical stage of a design is reached.</li> </ul>
	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>The BCHMA suggest that there is a requirement of 17,866 accessible and adaptable homes in the Black Country and a requirement for 1,674 wheelchair user dwellings. Combined this equates to approximately 25.7% of the total housing requirement (76,076), and 40% of the requirement that is expected to be met within the Black</li> </ul>

	<p>Country administrative area (47,837). That being the case, unless typically less than 40% of the houses on new development sites are built to NDSS standards there is no basis for this policy.</p> <ul style="list-style-type: none"> <li>• The PPG is quite clear that the Councils need to gather evidence first to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plan. There is not sufficient evidence to require all new properties to meet NDSS.</li> <li>• Support is given to the use of the NDSS. Can it be clarified that the impacts of this have fed into the viability work undertaken as part of the draft BCP?</li> <li>• The requirement for all new residential development to meet the NDSS (except where it would cause heritage harm) at part 4) of the policy is inappropriate. Part 4) should be amended to include as a further exception the provision of housing types to meet a particular need where deviation from the NDSS can be justified</li> </ul>
	<p><b>Developers and Stakeholder</b></p> <ul style="list-style-type: none"> <li>• requires new residential development to meet water efficiency standards of 110 litres per person per day. The Water Cycle Study (2020) identifies the Severn Trent Water and South Staffordshire Water supply regions as areas of only moderate water stress. A clear local need has not been demonstrated.</li> <li>• When the WCS was written, the water companies were classed as being in areas of “moderate” water stress. In July 2021, following a consultation exercise, the Secretary of State has determined that both Severn Trent Water (except their Chester zone) and South Staffs Water are now considered to be in areas of ‘serious water stress’ for the purposes of water resources planning. This change in water stress classification adds further weight to this tighter limit and it may be worth reflecting this new classification within the plan as it is a key driver to tighten water usage in this area.</li> <li>• this requirement is a minimum only and developments that choose to go beyond this should be supported by the plan. Further limiting water consumption and encouraging re-use would provide additional benefits in relation to managing the pressures of climate change. This links to comments in relation to Policy CC1 - Increasing efficiency and resilience. In light of this EA ask that you consider amending the policy to read as follows:</li> </ul> <p><i>3) New residential development (including conversions from non-residential properties) and houses in multiple occupation will be required to meet water efficiency standards<sup>59</sup> of 110 litres per person per day, as set out in Part G2 of current Building Regulations 2010 or any successor legislation. Any scheme that voluntarily proposes to go beyond this requirement would be viewed favourably.</i></p>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• support recognition of the opportunities that major developments provide in contributing to the greening of the Black Country, and the specific references in points 5a, 5b and 5c to green infrastructure opportunities. These</li> </ul>

	<p>opportunities can be realised in most developments at any scale - request that this should not apply only to major developments.</p> <ul style="list-style-type: none"> <li>• New development that is not appropriately located and/or well-designed can adversely impact nearby areas of public realm, green and blue infrastructure and open space in many of these ways. Suggest that either a point 8 should be added to policy to address adverse impacts on such areas or point 7 should be amended to indicate that development will need to avoid adversely impacting areas of public realm, green &amp; blue infrastructure or open space in these ways (where appropriate).</li> <li>• The policy is a missed opportunity to reference Active Design and Active Environments Principles which would sit well with the other principles of good design that are referenced in this policy and would then cross relate to the reference in policy ENV8, and to the other parts of the plan that relate to Health and Well-Being. For instance, could the wording of this policy be strengthened to require major developments to demonstrate they have addressed Active Design issues by providing an Active Design Checklist? (see appendix A of the attached guidance) <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a></li> </ul> <p>We are supportive of this policy and have a few queries. What is meant by clause 1a? Are there views linked with clause 1b and how have these been defined? We suggest that a link to Policy ENV5 is also necessary in clause 1e. We support clause 4.</p>
CC1	<p><b>Developers</b></p> <ul style="list-style-type: none"> <li>• Part e of the policy requires developments to incorporate “grey water recycling and rainwater collection” where possible. Whilst that requirement is recognised, it should be made clear that the use of grey water recycling should only be applied where viable and appropriate.</li> <li>• There is duplication with this policy and other policies that are in draft Plan. As such, this policy is superfluous and should be removed.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• It may be necessary for development to incorporate mitigation and resilience measures designed to reduce the risk of flooding from other sources. Suggest amending point (f) to refer to any potential source of flooding would be consistent with the NPPF and NPPG.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Water scarcity and energy use embedded in water purification, delivery and subsequent treatment of wastewater. Policy body only mentions water efficiency in relation to conversions (g), and greywater and rainwater collection as a means of reducing run-off (e).</li> </ul>

	<ul style="list-style-type: none"> <li>• Recommend CC1 include reference to the need to ensure both water resources and quality are considered in this policy to ensure water efficiency and protection and enhancement of the water environment is a priority.</li> <li>• The outcomes of WCS Phase 2 on water quality and reduction in river flow should feed into this policy.</li> <li>• Recommend the policy is reworded as follows: <i>1(i) new developments should reduce their water usage as far as possible through sustainable water demand management (in line with the requirements of ENV9)</i></li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Climate Change policy inadequate.</li> <li>• The policy deals entirely with how developments will individually be designed with climate change in mind.</li> <li>• The policy does not seek to influence where development happens.</li> <li>• Climate Change needs to be a core element of the plan including a target for reaching Net-Zero in line with the Councils position in terms of the Climate Emergency.</li> <li>• It also needs to influence which sites are included in the plan and their transport impact in terms of car-dependency.</li> <li>• Such a policy should be at the core of meeting the Climate Challenge in the Borough. It should also be included as a Core Strategic Policies.</li> </ul> <p><b>Residents Group</b></p> <ul style="list-style-type: none"> <li>• The Black Country Plan 2039 policy on Climate Change is inadequate and falls within other objections about lack of innovation and total reliance on sustained growth of existing models of production, wealth generation and income generation.</li> <li>• Natures Carbon Sinks must be sustained.</li> <li>• Dramatic Weather Patterns and Flooding - dramatic changes in weather patterns have resulted in Floods which the consequential economic, social and physical damages and costs. It is beyond stupid to develop on sites where the risks of Flooding on the site and adjacent areas is probable or already demonstrated.</li> </ul> <p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• Not enough emphasis is being placed on developers to reduce carbon emissions, too much emphasis on adaptation and mitigation to climate change, this needs to be reversed.</li> </ul>
CC2	<p><b>Residents</b></p> <ul style="list-style-type: none"> <li>• All new build housings should have solar panels, air pump heating as standard.</li> </ul>



	<ul style="list-style-type: none"> <li>• solar panels fitted on roofs paid for by council &amp; government put small wind turbine on roofs or in gardens hydro power cars only water comes out of exhaust pipe no plug-in cars less cost</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Support the need to minimise energy usage - question policy approach requiring various specific energy elements to be analysed where much technology and delivery of items such as combined heat and power are at tentative early stages.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• The Policy should make clear that a 'fabric first' method of reducing energy usage is preferable and most efficient. This approach also utilises existing well-tested technology, whereas some forms of energy generation have been adversely affected by products which are quickly obsolete or result in system failure.</li> <li>• The Policy goes on to refer to developments of 100 homes or more having energy provision developed and agreed between the Local Planning Authority and developer to establish the lowest lifetime carbon energy provision. The Policy identifies 10 individual requirements with regards to energy provision. Taylor Wimpey supports the need to minimise energy usage but question the approach taken in Policy CC2 which is requiring a number of specific energy elements to be analysed in an environment where much of both the technology and in particular ability to deliver items such as combined heat and power are at tentative early stages. Indeed, no reference is made in the Plan to any existing provision of combined heat and power within the Black Country and whilst it is understood that the plan is aspirational in this regard and that there is an overwhelming need to move towards a carbon neutral economy, providing a development plan policy with such specific requirements in an environment where there is little experience or existing provision points to a lack of evidence.</li> <li>• Instead, it is submitted that matters relating to the energy usage and efficiency of dwellings is deferred to Part L of Building Regulations and the roadmap to zero carbon and future homes standard.</li> </ul>
	<p><b>Agent on behalf of Landowner and Developers</b></p> <ul style="list-style-type: none"> <li>• We are concerned about the proposal to require a decentralised energy network on sites of 10 dwellings or more. We remain unconvinced that decentralised energy is always appropriate in anything other than unconstrained, strategic level development sites (OOO's rather than OO's of dwellings), and certainly not for smaller schemes.</li> <li>• This is because of the limitations this can place on the ultimate consumer -where decentralised energy can limit consumer choice in terms of energy provider and where the consumer may wish to add further energy saving measures - such as solar power, heat pumps, etc.</li> </ul>

<ul style="list-style-type: none"> <li>It is not clear from this policy why it would be beneficial: district heating systems have had a mixed result, where residents have had to sign up for long term contracts of 25 years or more. Efficiencies tend to be a lot lower for small schemes, as the infrastructure costs can be the same, so the larger the scheme, the more viable it could be. The industry itself is not regulated in the same way and physical problems with a district heating system or decentralised energy system can often result in whole areas being without heating or hot water for period of time.</li> </ul>
<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>it is important to note that decentralised energy provision and renewable and low carbon energy dwellings may not always be practicable or viable in new developments. Therefore, we are supportive of Draft Policies CC2 and CC7 insofar as they allow for such requirements to be reduced where it can be clearly demonstrated that it is not practical or viable.</li> </ul>
<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Criterion 4) in relation to future energy and infrastructure requirements places a significant burden on a developer at the planning application stage of a project when no certainty exists in relation to planning permission being secured. Whilst this strategic approach is acknowledged as important for large scale developments, the threshold of 100 homes seems to low. It is unlikely that energy providers will engage with this process at such an early stage with them requiring certainty on start dates, which without the benefit of planning permission will not be available.</li> </ul>
<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Development proposals will need to consider the harm to the historic environment and ensuring that any proposals protect the significance of heritage assets, including their setting.</li> </ul>
<p><b>Planning Agent</b></p> <ul style="list-style-type: none"> <li>Draft Policy CC2 (Energy Infrastructure) requires that “any development including ten homes or more, or non-residential floorspace of 1,000 sqm or more must include opportunities for decentralised energy provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised power networks”. We consider that this requirement complies with paragraph 157 of the NPPF.</li> </ul>
<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>Generally supportive but proposes an amendment for the preference of a fabric first method.</li> </ul>

	<ul style="list-style-type: none"> <li>• Support the need to minimise energy usage but question the approach taken in Policy CC2 which is requiring a number of specific energy elements to be analysed in an environment where much of both the technology and in particular ability to deliver items such as combined heat and power are at tentative early stages.</li> </ul> <p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• Offsite decentralised energy provision may be out of the control of landowners and have viability issues which the policy viability evidence has not considered. "Part 4 of the policy goes on to deal with proposals for on-site energy provision and the means by which this can be achieved. These provisions (parts a to j of the policy wording) are detailed, but not clearly justified".</li> <li>• Parts 1 to 3 of this policy require new developments of 10 homes or more to include opportunities for decentralised energy provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised power networks. Where there is existing decentralised energy provision available close to the site, the development will be expected to link into it or should be designed to accommodate a subsequent connection. Whilst Taylor Wimpey supports the principal of planning for development in ways which help, as much as possible, eliminate and mitigate greenhouse gas emissions, it has a number of concerns around the provisions of Policy CC2. Firstly, the assumption that developments can easily to off-site sources is problematic, as this may require connection through land outside of the ownership of the application and over which they have no control. As a result, it would be difficult to guarantee that such connections would be available to serve the site when required or that they would be available at all. In addition, the information provided in the BCP Viability Study suggests that the provision of or connection to decentralised energy networks has not been factored into the viability assessment work. The viability implications of such provision have not, therefore, been adequately assessed. The costs of provision or of connection to decentralised energy networks will need to be properly considered in the Council's viability evidence if this is to be pursued.</li> <li>• Part 4 of the policy goes on to deal with proposals for on-site energy provision and the means by which this can be achieved. These provisions (parts a to j of the policy wording) are detailed, but not clearly justified and so seem somewhat over prescriptive. We would recommend that the policy wording be revised to encourage developers and energy companies / bodies to engage in the early stage of the development process to establish the likely future energy and infrastructure requirements, and to engage with the relevant BCP authorities to determine the most appropriate solution.</li> </ul> <p><b>Agent on behalf of Developers</b></p> <ul style="list-style-type: none"> <li>• This policy requires major development sites to include opportunities for decentralised energy provision site – subject to viability and practicality. Savills has worked on numerous strategic residential schemes where this</li> </ul>
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	<p>approach has been suggested at the policy making stage. However, to date we have not found any examples that have been delivered viably by house builders. Further clarity is sought from the Council on the practicality of delivering decentralized energy provision on sites in conjunction with other policy requirements proposed.</p>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• The intention of Policy CC2 is recognised by WDH. However, it is noted that the requirement for sites of 10 or more dwellings to “include opportunities for decentralised energy provision within the site” is not required by national policy and has not been justified based on proportionate evidence (in accordance with NPPF paragraph 35b).</li> <li>• Moreover, whilst the reference to any provision being subject to suitability, feasibility and viability is welcomed, it is important that the BCAs take that requirement into account in a full viability assessment should they proceed with including that policy requirement (if it is fully justified).</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Identifies that development proposals would need to include opportunities for decentralised energy provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised power networks. Such an approach is supported, given that the policy suitably reflects that opportunities for decentralised energy provision may not always be appropriate or viable</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>• Proposed Policy CC2 requires development of 10 or more dwellings to include opportunities for decentralised energy provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised power networks. Where there is existing decentralised energy provision in close proximity to the site, the development will be required to connect to it or should be designed to accommodate a subsequent connection if a source has not yet become operational.</li> <li>• BHL are aware that decentralised energy networks can deliver benefits, including low carbon heat to residents, helping to reduce the carbon footprint. Yet, notwithstanding its merits, there are certain difficulties in its application. For example, in the case of communal heat networks, currently the predominant technology for district-sized communal heating networks is still gas combined heat and power (‘CHP’). The alternatives of large heat pumps, hydrogen or waste-heat recovery has been relatively slow on the uptake by heat network projects due to the large up-front capital cost. BHL consider that this will remain uneconomic for most heat networks to install low-carbon technologies for the foreseeable future.</li> <li>• BHL are aware of some reports and research that states that biomass renewable energy.</li> </ul>

	<ul style="list-style-type: none"> <li>plants are one of the biggest single sources of carbon dioxide and PM10 (particulate matter of 10 micrometres and smaller) air pollution of all EU power stations- more so than some of Europe's Coal Plants. The UK Government treats bioenergy as immediately carbon neutral on the assumption that forest regrowth soaks up the carbon again, but recent science disputes its carbon neutrality. BHL considers that more research needs to be done before decentralised energy provision is mandatory in local planning policy.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>We welcome the expectation in policy CC2 that heat sources for a communal heating system should be chosen to minimise likely emissions. The use of fossil fuels and all forms of energy generation that rely upon the combustion of carbonaceous feedstocks will need to be phased out and replaced by zero carbon, non-polluting and energy-efficient sources. Sustainably maximising the use of heat extraction from the canal network should have a valuable role to play in this.</li> <li>The expectation that heat sources for a communal heating system should be chosen to minimise likely emissions could be strengthened by setting out a hierarchy against which developers and decision makers will be expected to assess proposals. Such an approach is set out in policy SI 3 (D) of the recently adopted London Plan. It gives preference to zero-emission and local secondary heat sources over lower emission solutions like combined heat and power. The definition of secondary heat within the plan includes heat that exists naturally within the environment (air, ground and water).</li> </ul> <p><b>Agent on behalf of Landowner and Developer</b></p> <ul style="list-style-type: none"> <li>We object to the requirement that all developments of 10 or more houses or more than 1,000 square metres should include opportunities for decentralised energy provision. Whilst in theory the use of decentralised energy has a number of sustainability benefits, the reality is that incorporating it in new development is very difficult and expensive on small schemes making it unviable. Similarly, the end user i.e., homeowners, commonly have next to no experience of using shared heating systems and this can often be a detractor. As such, there is no desire to develop the technology as ultimately there is no demand from the purchasers.</li> </ul>
CC3	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Buildings and open spaces used by large numbers of people should balance the benefits of sunlight and ventilation with the need for shelter from extremes of weather - heat, cold and rain and snowfall. The covered colonnade, common in many countries, is under-used in the UK. COVID exposed the paucity of provision of sheltered outdoor seating, noticeably outside catering venues.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>The University of Manchester has undertaken research into the effect of urban cooling from the Rochdale Canal on Manchester City Centre and concluded that there is a notable cooling effect from the canal. Policy</li> </ul>

	CC2 should recognise the benefit of maintaining and enhancing (including through restorations) the Black Country's waterway network as part of efforts to manage heat risk.
CC4	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>Policy CC4 deals with air quality. It states the Plan will promote a diverse approach to addressing the issue of poor air quality. Taylor Wimpey supports this approach. However, Criterion 2 states new development must be air quality neutral and, amongst other things, should not lead to a deterioration of existing poor air quality. The Policy should be amended to indicate that mitigation measures which would in overall terms ensure that air quality was not diminished, would be a legitimate way forward rather than an in-principle objection to any proposal that could have even the slightest degradation of air quality. Other parts of the Policy already provide such a scenario. In addition, whilst Criterion 2 states development must be air quality neutral, Criterion 4 indicates that where proposals have a moderate air quality impact which can be dealt with standard mitigation measures, there will not be a requirement for air quality assessment. This appears to provide an inherent contradiction with the approach set out in the Policy. This all points to the need to revise Criterion 1 of the Policy.</li> </ul> <p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>Identifies conflict between Criterion 2 and 4 and suggests that Criterion 2 should be amended so that in overall terms air quality is not diminished by development rather than "an in-principle objection to any proposal that could have even the slightest degradation of air quality." Also concludes that Criterion 1 is also amended.</li> <li>Supports a diverse approach to dealing with air quality.</li> </ul> <p><b>Agent on behalf of Developers</b></p> <ul style="list-style-type: none"> <li>New development is expected to be 'air quality neutral' within Policy CC4. Further clarity is sought as to whether this includes mitigation.</li> </ul> <p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Support, but the policy should also identify a potential need for a Clean Air Zone to bring air quality standards in line with national legal limits, if required.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Under policy CC4 Air Quality, paragraph 10.179 should also be expanded to include the following text: "This revised version will need to take into account the current Environment Bill and its requirement for new UK targets, to be set by October 2022, for annual average levels of PM 2.5 in ambient air, and for population exposure reduction to PM 2.5. The University of Birmingham-led WM-Air Project, which is supported by West</li> </ul>

	<p>Midlands local authorities and WMCA, will then help inform the development of the new Black Country Air Quality Supplementary Planning Guidance document”.</p> <ul style="list-style-type: none"> <li>• Furthermore, under the Strategic Approach (point 1a) the policy should include public transport and read “the integration of cycling, walking, public transport and electric charging points as part of their transport provision”. Also point 1b should include walking and cycling and read “promoting and supporting (including through continued joint working with authorities outside the Black Country) a modal shift from private motorised vehicles to use of clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks and cycling and walking”.</li> <li>• In summary, greater acknowledgement of decarbonizing the transport system is required in this chapter, through ensuring new developments do not result in additional trips and carbon emissions, through using far less energy intensive personal vehicles and more sustainable modes and ensuring our land use policies result in people travelling far less and over shorter distances. Aligning this chapter with that of the transport chapter is therefore imperative, to demonstrate the links transport plays in tackling the climate emergency.</li> </ul>
CC5	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Point 11 - Flood Risk Groundwater Source Protection Zones: Although we welcome the inclusion of this point, this should not sit within flood risk policy CC5 as it is not do with flood risk. In light of our comments in relation to the water cycle study, foul drainage and river basin management planning we recommend an additional policy is added which addresses the protection of water quality and the wider water environment, sitting aside from flood risk, climate change and biodiversity-specific issues. This policy requirement would sit better within such a policy body.</li> <li>• Our groundwater protection guidance documents state that in SPZ1 and SPZ2, the Environment Agency will only agree to proposals for infrastructure developments of non-national significance where they do not have the potential to cause pollution or harmful disturbance to groundwater flow or where these risks can be reduced to an acceptable level via Environmental Permitting Regulations if applicable.</li> <li>• Where a new infrastructure development presents a significant risk to groundwater, the Environment Agency may require a programme of groundwater monitoring to be designed, agreed, installed and undertaken to give early warning of any developing groundwater pollution and/or interference to groundwater flow. This programme may include off-site locations if necessary to identify pollution and to allow monitoring in the event that the site becomes inaccessible. Where appropriate, the Environment Agency will use its powers to require this at existing sites.</li> <li>• Point 12 - This section should highlight the relevant River Basin Management Plans which provide additional detail on the de-culverting and the creation of naturalised watercourses.</li> </ul>

- Point 14 - This should be expanded to read to link into the requirements under point 15 'Development should not take place over culverted watercourses and a suitable easement should be provided from the outside edge of the culvert'.
- Point 15 - We welcome this policy as it goes beyond the Environment Agency's statutory remit in permitting development along watercourses which only requires an 8m easement along Main Rivers for flood risk maintenance and access purposes.
- Supporting text should include reference to the Main Rivers to support the general statement of 10m easement from main rivers.
- Point 17 - We strongly recommend the addition of the following element to this point to which supports sustainable development.
- 'Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme the developer will be expected to contribute towards the cost of delivery and/or maintenance of that scheme'.
- We strongly support this part of the policy and welcome the provision of safeguarding land for flood risk management. This approach is in line with planning policy guidance which states, 'If an area is intended to flood, e.g., an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often'.
- Point 9c) States that an FRA will be required for minerals or waste development. As this is not a requirement of the NPPF we query the reason for including this, and the evidence base to support its inclusion. The Environment Agency would not look to review such information under our role as a statutory consultee and as such would likely fall to the LLFA to undertake such review. Such sites would be regulated under the Environmental Permitting Regulations with a mind to preventing pollution. Surface drainage is addressed within these permits. Any such FRA would need to take this into account and ensure any consideration of drainage issues are complementary and no duplication of the planning and permitting regime occurs.
- This policy should take into account the latest climate change allowances are available on the following website: [https:// www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances). Please note the guidance has recently been updated to give more local climate change figures.
- This policy should reference the latest Strategic Flood Risk Assessment to take account updates to this assessment to ensure that developments are using the latest assessments of flood risk in the area.



	<ul style="list-style-type: none"> <li>We strongly support a catchment approach to flood risk and water management and the promotion of Nature Based Solutions to provide wider environmental and community benefits both on site, off site and on a strategic level.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>Policy CC5 deals with flood risk, of which Criterion 2 indicates that the sequential test will be applied to all developments to ensure that it takes place in areas with the lowest flood risk. This does not accord with the NPPF or PPG, which only requires a flood risk assessment to be provided in respect of major developments or developments within areas of defined flood risk. The Policy needs to be clearer and that the sequential test referred to in Criterion 2 only applies to the specific circumstances set out in the NPPF. Paragraph 167 of the NPPF is clear that only certain applications will be subject to site specific flood risk assessments and this in turn can lead to the application of the sequential test for flood risk. The Policy should reflect this.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Support that developments should, where possible, naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements.</li> <li>Point 15 - Support that there should be no built development within five metres of an ordinary watercourse and ten metres of the top of the bank of a main river, these buffers should be given as minimums allowed only in exceptional circumstances. Developers should be expected to provide buffers which protect and, where relevant, increase the extent of the natural environment adjoining the watercourse. Furthermore, whilst WTBBC support the enabling of the preservation of the watercourse corridor, public access and new and improved greenways should also be given as a desired outcome, with links to policies CSP4 and ENV8 made.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>Developments should, where possible, naturalise urban watercourses and open up underground culverts, to provide biodiversity net gain as well as amenity improvement. I support that there should be no built development within five metres of an ordinary watercourse and ten metres of the top of the bank of a main river, these buffers should be given as minimums allowed only in exceptional circumstances. Developers should be expected to provide buffers which protect and, where relevant, increase the extent of the natural environment adjoining the watercourse.</li> </ul>
	<p><b>Planning Agent</b></p> <ul style="list-style-type: none"> <li>Draft Policy CC5 (Flood Risk) states that the Black Country Authorities will seek to minimise the probability and consequences of flooding by adopting a strong risk-based approach to site allocations and the granting of planning permission, in line with the NPPF.</li> </ul>

	<p><b>Parish Council</b></p> <ul style="list-style-type: none"> <li>We welcome the revised policy CC6 Sustainable drainage and surface water management to protect the blue infrastructure of the plan area and wider water catchment including the river Stour and its tributaries.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>It is important to ensure that policy CC5 is effective in minimising the probability and consequences of flooding from all sources, in accordance with the NPPF.</li> <li>we suggest that part 1: The BCA will seek to minimise the probability and consequences of flooding from all sources is referred to within some points of this policy, we suggest that part 1 of the should be amended to state 'The BCA will seek to minimise the probability and consequences of flooding FROM ALL SOURCES by...' (and the amendments that we suggest to CC1) would help to ensure that the requirement is clear from the outset.</li> <li>The Trust owns and manages reservoirs within the Black Country. Building properties in the inundation zone of a dam could adversely alter the risk assessment for the reservoir which may require additional works to be carried out at the expense of the applicant/developer, to reduce the risk to an acceptable level. Whilst the likelihood of reservoir failure may be considered low, the consequences of such a failure can be significant. The failure of a reservoir has the potential to cause catastrophic damage due to the sudden release of large volumes of water. This change in risk cannot be properly quantified and assessed without detailed information and may require updated breach models, funded by the developer, to compare the current and proposed consequences of a dam failure. The outcome of this modelling should then form a key part of the Flood Risk Assessment for the site and will aid in determining whether mitigation measures either on or off-site can alleviate flood risk concerns and make the development compliant with national planning policy. This work would be necessary for the Trust to determine whether the applicant / developer will need to fund any work at a reservoir to mitigate increased risk. It should however be recognised that it is highly unlikely to be able to remove the risk entirely.</li> <li>Developers need to be aware that sluices and weirs that CRT use to remove excess water from canal infrastructure may run in culvert under their site - even some distance from the canal. The same applies for feeders. Feeder abstraction points will soon be under licence conditions so any development near a point on a watercourse where the Trust abstracts must not alter the current set up.</li> </ul> <p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>The policy needs to be clearer and that the sequential test referred to in Criterion 2 only applies to the specific circumstances set out in the NPPF.</li> </ul> <p><b>Residents Group</b></p>
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	<ul style="list-style-type: none"> <li>• Pleased to see the recognition of the importance of planning taking account of regional and local flooding risk. These concerns relate to the lack of a holistic approach to water catchment management. This does now seem to be understood in the rural/agricultural context but maybe less so in urban areas. Managing the soil so that water is allowed to percolate below the surface and hence stored before drainage/runoff. Housing projects should include an element of soil management to this end - the tendency for homes to pave large areas to the exclusion of "gardens" should be discouraged or CONTROLLED!</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Policy CC5 on Flood Risk, identifies waste (and mineral) facilities as the only types of development where all such proposals would require a flood risk assessment and surface water drainage strategy. While proposals for certain types of waste facilities may need such assessment, WMRTAB suggest that the BCAs check whether this blanket approach is justified.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Solutions should be sought where flooding affects heritage assets and the wider historic landscape. Any measures identified must be appropriate and sensitive to the significance of heritage assets and their setting.</li> </ul> <p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>• Support the recognition of potential cross boundary impacts and the approach at paragraph 17)</li> </ul>
CC6	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Support that all new developments should incorporate SuDS and all development proposals should provide details of adoption, ongoing maintenance, and management of SuDS.</li> <li>• Support that preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area, a clear link to Policy ENV3 and the delivery of the Draft Black Country Local Nature Recovery Strategy should be made.</li> </ul> <p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• Supports the utilisation of SuDS, there are circumstances where SuDS are not feasible, such as ground conditions. In view of this the policy requires amendment to allow for such exceptional circumstances. Furthermore, Taylor Wimpey does not support cross reference to 'design standards'. Any standards should be contained within the Plan for clarity.</li> <li>• Criterion 3 states for major development surface water flows must be reduced back to an equivalent greenfield rate. It goes on to state that if greenfield run-off rates are not considered to be feasible for viability reasons, then this must be evidenced by the developer. However, there are circumstances where, for reasons</li> </ul>

	<p>other than viability, such as location or size of development or other site constraints, where greenfield rates could not be achieved unrelated to viability. The Policy should be amended to reflect this.</p>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Development proposals will need to consider the harm to the historic environment and ensuring that any proposals protect the significance of heritage assets, including their setting.</li> </ul>
	<p><b>Resident</b></p> <ul style="list-style-type: none"> <li>In the future I would go so far as to suggest all new houses come with a system of rainwater collection.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>There are circumstances where SuDS are not suitable and where there are circumstances other than viability which prevents greenfield rates being achieved.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Subject to the Trusts' agreement to technical and commercial details, surface water can be sustainably discharged to the canal network. Water levels in the canal network are managed by the Trust using control structures such as weirs and sluices to maintain a suitable depth for navigation by boats, but also to try to avoid water levels becoming too high in periods of heavy rainfall where runoff from hard surfaces can lead to excess water passing into the canals. Given this, surface water discharge to canals can be a highly effective way of managing local surface water flood risk and may allow development of sites that would otherwise not be viable due to concerns with alternative site drainage options.</li> <li>SUDs adjacent to or connecting to canals will need to be maintained to ensure they function as they were designed to and do not cause pollution or excess flows.</li> <li>In the interests of local flood risk management and the protection of water quality, where a site proposes SUDs, this system should be designed in a way that if it were to fail the canal would not be inundated with water.</li> </ul>
	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>Support the recognition of potential cross boundary impacts and the approach at paragraph 17</li> </ul>
CC7	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>Policy CC7 relates to renewable and low-carbon energy. It states that major developments of 10 or more homes must achieve a 19% carbon reduction improvement over the requirements of the Building Regulations Part L 2013 or achieve any higher standard than this that is required under new national planning policy or Building Regulations and, in addition, incorporate generation of energy from renewable or low-carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development. This</li> </ul>

	<p>requirement would clearly impose a significant burden upon even relatively small-scale proposals. The justification does not identify any evidence as to why 19% is the appropriate target. As is the case with other policies relating to energy generation and/or nature conservation, referring to either separate regulatory regimes or standards that are not currently in force, is not appropriate for a development plan policy.</p> <ul style="list-style-type: none"> <li>• In addition, it is also recognised in the justification of the policy (Paragraph 10.211) that the 20% renewable energy requirement will impact on some major developments within the Black Country from a viability perspective. If this is already acknowledged on the macro level, before site specific circumstances which can impose further development costs are established, then it is not sound to include a blanket policy requirement of this type. In addition, the justification indicates that as well as the 19% carbon reduction improvement required for major development under Policy CC7, the requirement for energy generation (20%) would be beyond the already discounted figures. This is unduly onerous and not backed up by evidence.</li> </ul>
	<p><b>Agent on behalf of Developer and Landowner</b></p> <ul style="list-style-type: none"> <li>• The aims of CC7 are laudable, it is clear that there is some duplication between this planning policy and Building Regulations, which are delivered in any case. There are therefore elements of this policy which are not particularly justified or necessary, insofar as they effectively repeat Building Regulations requirements.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• objects Policy CC7 which requires that major developments creating ten or more homes must: <ul style="list-style-type: none"> <li>a. achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document, Part L 2013, or achieve any higher standard than that is required under new national planning policy or building regulations.</li> <li>b. incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion.</li> </ul> </li> <li>• It also requires assessment of the use of district heat and / or decentralised energy networks.</li> <li>• Recognises the benefits of reducing energy use and promoting renewable technologies and meets Part L on all sites and regularly seeks efficiencies above the recommended standard. However, we consider that no clear evidence has been provided in the Draft BCP to confirm why a 19% reduction has been identified and why it is justified.</li> <li>• In addition, the policy relates to a proposed reduction in Building Regulation targets. The control of emissions is controlled through Building Regulations and the application of a Local Plan policy which seeks a reduction below these targets is not appropriate. In order to ensure consistency with the Building Regulations, it is considered that any reduction in emissions should be informed by up-to-date Building Regulations targets rather than through the</li> </ul>

	<p>application of a local plan policy.</p> <ul style="list-style-type: none"> <li>• Also notes that no clear justification or evidence is provided for the 20% renewable or low carbon sources requirement in Part 3(b) of the policy. It appears that the BCP authorities have selected an arbitrary figure for this requirement which is based on policy aspiration only and is not supported by any evidence.</li> <li>• The justification text to the policy indicates that the 20% requirement should be applied to the residual energy demand of the development, after application of the 19% carbon reduction improvement required by policy CC7. The costs to developers of meeting these requirements would therefore be significant.</li> <li>• The Viability Study indicates that cost applied to meet these standards is £4,615 per unit which is the cost of Option 2 Part L Interim Uplift 2021. The cost of Future Homes Standard 2025 will be much higher and further extra-over costs should be included. We also note that the BCP Viability Study excludes any additional costs associated with compulsory connections to heat networks.</li> <li>• Considers that the BCA should comply with the Government's intention of achieving net zero carbon development through the Building Regulations. The proposed policy approach is unnecessary because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.</li> <li>• Policy CC7 is considered to be contrary to the Framework as it is not justified and based on proportionate evidence. In order to ensure that the Policy is sound Taylor Wimpey considers that Parts 3, 4 and 5 of Policy CC7 should be deleted.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• Supports the objective of achieving net zero carbon development but considers that the BCP should comply with the Government's intention of achieving net zero carbon development through the Building Regulations. As such, the BCA's proposed policy approach is unnecessary because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• We are generally supportive of Draft Policies CC2 and CC7 which relate to the mitigation of, and adaptation to, climate change.</li> <li>• However, it is important to note that decentralised energy provision and renewable and low carbon energy dwellings may not always be practicable or viable in new developments. Therefore, we are supportive of Draft Policies CC2 and CC7 insofar as they allow for such requirements to be reduced where it can be clearly demonstrated that it is not practical or viable</li> </ul>
	<p><b>Residents</b></p>

	<ul style="list-style-type: none"> <li>• All new builds should incorporate electric only (no gas) and solar panels should be installed on EVERY NEW PROPERTY BEING BUILT.</li> <li>• All new housing should also be built with this in mind and any redevelopment - solar panel, the new green boilers etc.</li> <li>• My main comment on the plan is that all new homes should be built to net zero carbon standards now.</li> <li>• The policy should include operational carbon emissions but also embodied carbon emissions. For a new home, the embodied carbon emissions from construction can be as much as half the carbon footprint measured over its 60-year design life (RICS, 2017).</li> <li>• There is a considerable evidence base for much stronger local standards, a there is no agreed national standard, “Future Homes standard” still be some years away and subject to consultation.</li> <li>• There is clear evidence that new homes built merely to minimum Building Regulations standards - i.e., not built to zero carbon standards - would be five times more expensive to retrofit a decade later (Currie &amp; Brown, 2019).</li> <li>• Construction is clearly the best point at which to make a home both energy efficient and low carbon.</li> <li>• We support the objective of delivering higher levels of sustainability in new development, however, we disagree with the need for this policy. It largely replicates Building Regulations.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Development proposals will need to consider the harm to the historic environment and ensuring that any proposals protect the significance of heritage assets, including their setting. We recommend that the policy supports appropriate and sensitively located renewable energy installations that do not harm the historic environment, including their setting.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• This Draft Policy seeks to ensure that a high standard of sustainable design is secured on all new developments over the Plan period, primarily through a list of requirements and standards. All proposals of ten or more homes are to achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013. In addition, they must incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 20% of the residual energy demand of the development on completion. It is advised that a variety of renewable and low-carbon energy sources and generation methods should be assessed and costed, including on-site and off-site sources where appropriate, and the use of district heat and / or decentralised energy networks. An energy assessment must</li> </ul>

	<p>be submitted. Some flexibility is provided in the case of viability issues and practical constraints resulting in the requirements being unachievable.</p> <ul style="list-style-type: none"> <li>• Whilst the principle of addressing climate change via the design of new dwellings is supported as part of overall sustainable development, the costs associated with the local policy requirements proposed should be fully accounted for within the Viability Assessment. Whilst the Viability Assessment appears to reflect these considerations (in table 3.5) it notes the need for the assessment to be kept under review, particularly in light of the COVID-19 pandemic. It is recognised that viability is now to be considered ‘up front’ as part of the Local Plan process; nevertheless, as the Viability Assessment still represents primarily a typology-based approach, the Council’s policies should continue to offer site and scheme specific flexibility (in line with the NPPF, paragraph 58).</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Ground Source Heat Pump (GSHP) systems can be used for heating or cooling and are, in principle, energy and CO2 efficient. However, unless they are managed carefully there is the potential that the ground and groundwater can eventually warm or cool to a point where the system cannot continue to operate efficiently, or at all. Adjacent systems may also interfere with each other. The system operator should also consider potential for loss or damage to third parties. The following key issues should be taken into consideration: <ul style="list-style-type: none"> <li>• Risk of the pipes or borehole(s) creating undesirable connections between rock or soil layers. This may cause pollution and/or changes in groundwater flow and/or quality.</li> <li>• Undesirable/unsustainable temperature changes in the aquifer or dependent surface waters.</li> <li>• Pollution of water from leaks of polluting chemicals contained in closed loop systems.</li> <li>• Pollution of water from heat pump discharge from an open loop system that contains additive chemicals.</li> <li>• Impacts of re-injection of water from an open loop system into the same aquifer, both hydraulic and thermal, as well as any water quality changes induced.</li> <li>• The potential impact of groundwater abstraction for ground source heat systems on other users of groundwater or surface water.</li> </ul> </li> <li>• We expect developers to undertake appropriate prior investigations for these systems. This should include environmental risk assessment and method statements for the construction and operation of the systems. These may be provided as part of the planning process.</li> <li>• Any proposals for renewable and low carbon energy generation may be subject to the requirement of the Environmental Permitting Regulations and therefore require an environmental permit under the Environmental</li> </ul>



	<p>Permitting (England &amp; Wales) Regulations 2016, from the Environment Agency, unless an exemption applies. For such proposals we recommend that the Environment Agency is contacted for further advice and to discuss the issues likely to be raised.</p> <ul style="list-style-type: none"> <li>• Surface water heat pumps may also require permits from the Environment Agency.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p> <ul style="list-style-type: none"> <li>• No evidence to support a 19% carbon reduction improvement over part L of building regulations and reference to separate legislation not in force is not appropriate for a development plan document. The justification acknowledges viability issues before site specific circumstances are known and it is not sound to include a blanket requirement.</li> </ul>
	<p><b>Agent on behalf of Developers</b></p> <ul style="list-style-type: none"> <li>• The Policy requires that major developments should achieve a 19% carbon reduction improvement and incorporate renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion. These requirements are considered to be over and above the requirements of PPG which states that Local Plans “can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, which are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes”.</li> <li>• The PPG also states that if a Council is “considering policies on local requirements for the sustainability of other buildings, local planning authorities will wish to consider if there are nationally described standards and the impact on viability of development” The Viability and Delivery Study (May 2021) has assumed £4,615 per unit for this policy. We consider that this is a significant amount of money per dwelling just to meet energy requirements without any of the other requirements being sought in the plan to be taken into account e.g. affordable housing, specialist housing, accessible dwellings, Green – Belt compensation and other S106 contributions and CIL monies that will be sought by the Council and statutory consultees.</li> <li>• In relation to developments providing at least 20% of energy from renewables, consideration should be given to the capital cost and land take involved to achieve this requirement which we do not consider has been undertaken in the Council’s evidence base. Furthermore, it should be noted that it is now the case that sourcing energy from the National Grid can actually, in some cases be more sustainable than small scale renewable energy production as each year they are sourcing more of their energy from renewable sources.</li> <li>• We consider that the policy should be amended to ‘encourage’ development to apply the energy hierarchy to reduce energy demand and minimize carbon dioxide emissions. The policy should state that this will be subject to viability and suitability considerations at the application stage.</li> </ul>
	<p><b>Agent on behalf of Developer</b></p>

	<ul style="list-style-type: none"> <li>As currently drafted the policy is not “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” in accordance with NPPF paragraph 16d. For example, policy requirement 3a states that developments of 10 or more homes should “achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document, Part L 2013, or achieve any higher standards than this that is required under new national planning policy or building regulations.” From that, however, it is not clear whether, at the point that the new national standards have been adopted, a 19% carbon reduction improvement will still be required, and whether a “higher standard” will then be required above that.</li> <li>Notwithstanding that lack of clarity, requirements that go over and above the Government’s approved Building Regulations must be justified based on proportionate evidence and should be taken into account in a Viability Assessment to ensure that the policy requirement, alongside the cumulative cost of other policy requirements, do not render developments unviable.</li> <li>As such, it is suggested that Policy CC7 should not seek an uplift over and above the current Building Regulations given the lack of justification given, and also should not pre-empt any future Building Regulations requirements. Rather, it would be more suitable to seek adherence to “the Government’s latest Building Regulations”, which will ensure that the policy is not quickly rendered out-of-date or is not undeliverable.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>With regard to BREEAM Standards, Part 6 of Draft Policy CC7 requires all new non-residential developments greater than 5,000 sqm gross to meet BREEAM Excellent Standards, unless it can be demonstrated that achievement of the standard would make the proposal unviable, through submission of an independently assessed financial viability appraisal. Draft Policy CC7 is therefore generally supported as it notes that achieving BREEAM excellent may not always be a viable option.</li> </ul>
	<p><b>Developer</b></p> <ul style="list-style-type: none"> <li>Proposed policy CC7 requires developments of 10 or more dwellings to achieve a 19% carbon reduction improvement upon the requirements of Part L 2013, or any higher standard required under Building Regulations. Major developments should also generate energy from renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion. An energy assessment must be submitted with the planning application to demonstrate these requirements have been met. Only if the achievement of the target would make the proposal unviable, or if there are practical constraints, can the target be reduced.</li> <li>BHL recognise that increasing the amount of energy from renewable and low carbon technologies will help to make sure there is a secure energy supply and reduce greenhouse gas emissions to slow down climate</li> </ul>

	<p>change. BHL considers that planning has an important role in the delivery of new renewable and low carbon energy infrastructure, however, policies should ensure that they follow nationally consistent set of standards/timetables and are implementable.</p> <ul style="list-style-type: none"> <li>• BHL are aware that there is now a clearer and quicker roadmap to a lower-carbon future for new homes following the results of The Future Homes Standard 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) finally published in January 2021. BHL note that from June 2022, new homes will have a 31% reduction in CO2, when compared to current standards which will be stated in the new interim Part L and Part F Legislation (December 2021); before bigger changes in 2025 that will mean a 75% reduction in CO2 in new dwellings. Yet, the Government's own response to The Future Homes Standard Consultation admits that that the interim Part L won't see an immediate increase to install heat pumps, simply because the skills and supply aren't yet set up at this scale. The Government also confirmed that the Planning and Energy Act 2008 will not be amended and therefore, BHL are aware that the BCA can set local energy efficiency standards for new homes.</li> <li>• However, BHL consider that the BCA should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. BHL believe that the success of achieving a low carbon future is by standardisation rather than individual Council's specifying their own policy approach to energy efficiency. In addition, the BCA has not provided any evidence to specify these local standards and so this policy is not in accordance with paragraph 31 of the NPPF. BHL consider that the BCA should not set their own local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards already proposed in the 2021 Part L uplift and the Future Homes Standard 2025.</li> </ul>
	<p><b>Planning Agent</b></p> <ul style="list-style-type: none"> <li>• Draft Policy CC7 (Renewable and Low Carbon Energy and BREEAM Standards) requires that major developments creating ten or more homes or non-residential floorspace of 1,000 sqm gross or more (whether new build or conversion) must achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document, Part L 2013, or achieve any higher standard than this that is required under new national planning policy or building regulations; and, in addition b) incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion. All new build non-residential developments, student housing and care homes of 1,000 sqm gross or more should achieve the relevant BREEAM Standard. We agree that this policy requirement is appropriate and in line with the requirements of the revised NPPF.</li> </ul>
	<p><b>Agent on behalf of Landowner</b></p>

	<ul style="list-style-type: none"><li>• We support the objective of delivering higher levels of sustainability in new development, however, we disagree with the need for this policy. It largely replicates Building Regulations.</li></ul>
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11)Waste			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
<i>Waste Introduction</i>	0	0	8
<i>W1</i>	1	0	10
<i>W2</i>	2	0	3
<i>W3</i>	1	1	1
<i>W4</i>	1	1	4
<i>W5</i>	0	0	1

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(type of respondents which raised these issues highlighted in bold)</i>
Waste - General	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>It would also be useful to classify existing waste capacity according to its' relative Waste Hierarchy Status, rather than simply the general type of facility.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Best available evidence - WMRTAB notes that the BCP waste policies are supported by a waste needs assessment that utilises data derived from 2017. This will become dated by the time of submission and examination and the implications of the latest available data post-2020 should be considered.</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>WMRTAB - The Black Country is a net importer of waste, however, 'capacity gaps' are identified over the plan period in relation to waste management capacity and the BCP notes that additional capacity will need to be developed between 2018 to 2038 to maintain net self-sufficiency. This is supported however net self-sufficiency does not appear to be an objective within the BCP, such an objective should be clearly set out.</li> </ul>
W1	<p><b>Stakeholder</b></p>

	Engagement through the WMRTAB (West Midland Regional Technical Advisory Board) welcomed but noted that further DtC engagement to take place.
	<b>Stakeholder</b> No explicit mention is made about how the management of waste can contribute to the mitigation of climate change and, in light of national policy (and plan making legislation), suggest that this is an area in need of attention.
	<b>Stakeholder</b> The requirement for additional waste management capacity (Table 9 of the BCP) includes an estimate of the land area required which is considered significant. Unclear whether this quantum of capacity will actually be achieved in light of the fact that no land has been specifically allocated for waste management. It is suggested that an assessment of how such land will become available is required, including considering whether any changes to policy are required to facilitate additional capacity.
	<b>Stakeholder</b> Further consideration required regarding non-hazardous landfill requirements, including unmet requirements in neighbouring areas. This should consider how imports of non-hazardous landfill in the Black Country might increase as landfill capacity elsewhere becomes exhausted.
	<b>Stakeholder</b> Separate clause for the protection of the historic environment and to ensure that any planning applications that come forward for waste proposals fully consider the impacts for the historic environment.
	<b>Stakeholder</b> <ul style="list-style-type: none"> <li>• Paragraph 11.3 b): To reflect current thinking we recommend this is reworded to say, ‘The expansion of producer responsibility obligations and introduction of deposit return schemes for packaging wastes....’</li> <li>• Paragraph 11.3 d) refers to ‘waste disposal crime’. Waste crime covers a wide range of activities, including failure of waste producers to comply with the Duty of Care regime, tax and compliance evasion, and ‘sham recovery’ activities, as well as flytipping, illegal dumping and warehousing. Please consider not restricting the problem to just ‘Waste Disposal’.</li> </ul>
W2	<b>Stakeholder</b> <ul style="list-style-type: none"> <li>• General support for Policies W2, W3 &amp; W4. Some clarifications regarding the acceptability of proposals in terms of their impact on road networks may be required.</li> <li>• The management of waste and its contribution towards the mitigation of climate change could be more explicit and should be considered.</li> </ul>

	<p><b>Business Owner</b> The Policy aims to safeguard all existing strategic and other waste management facilities, however the BCP contradicts this through allocating a sustainable recycling site for housing, despite the shortfall.</p> <p><b>Stakeholder</b> Paragraph 3 is welcomed, although it would be useful to indicate what the word 'near' means, -preferably setting a safety margin on top of a minimum buffer zone where required and requiring appropriate measures under 'Agents of Change', including the ongoing maintenance of any requirements.</p>
W3	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• General support for Policies W2, W3 &amp; W4. Some clarifications regarding the acceptability of proposals in terms of their impact on road networks may be required.</li> <li>• The management of waste and its contribution towards the mitigation of climate change could be more explicit and should be considered.</li> </ul>
W4	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• General support for Policies W2, W3 &amp; W4. Some clarifications regarding the acceptability of proposals in terms of their impact on road networks may be required.</li> <li>• The management of waste and its contribution towards the mitigation of climate change could be more explicit and should be considered.</li> </ul> <p><b>Stakeholder</b> Local Employment Areas are identified as the preferred locations for waste management facilities. Many of these Local Employment Areas are located along the canal network of the Black Country and, as such, the development of new facilities has the potential to have a significant impact on the local natural and built environments of the canals.</p>

12)Minerals			
Policy, site allocation or main heading	Number in Support	Number Objecting	Number commenting
Minerals Introduction	1	1	4
MIN1	1	1	3
MIN2	1	2	8
MIN3	2	0	6
MIN4	0	0	5

Policy, Proposal or Main Heading	Key Issues Raised by the Representations (type of respondents which raised these issues highlighted in bold)
Minerals - General	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Encourage inclusion of text relating to the availability of building stone required for the maintenance of heritage assets to maintain local distinctiveness and character in new development, with reference to Historic England's <i>Strategic Stone Study</i> may be beneficial.</li> </ul>
MIN1	<p><b>Agent on behalf of Business</b></p> <ul style="list-style-type: none"> <li>Policy MIN1 states that sufficient provision has been identified within the plan areas to enable the Black Country to supply at least 25% of the 7-year land bank for the West Midlands Metropolitan Area. Solihull is the only other authority within the area with workable resource, a high proportion of its 4 million tonnes of permitted mineral reserves are sterilised by HS2, it is unlikely Solihull will be able to sustain its output, so the BCP needs to provide for as much production as possible to fulfil regional demands.</li> </ul> <p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>A 25% seven-year land bank of sand and gravel supply in the WMMA and identified Preferred Area under Policy MIN1 is supported.</li> </ul> <p><b>Resident</b></p>



	<ul style="list-style-type: none"> <li>Sufficient brick clay provision has been identified for 25 years needs but only by large imports of brick clay from outside of the Black Country. Importing will incur an environmental impact, the supply should be more self-sufficient and ensure that our own natural resources are not lost to sterilisation.</li> </ul>
MIN2	<p><b>Agent on behalf of Business</b></p> <ul style="list-style-type: none"> <li>Support for Policy MIN2, especially emphasis on safeguarding when assessing development which falls within a defined mineral safeguarding area to ensure development does not compromise future or existing mineral working.</li> </ul> <p>However, reference to economic value of mineral resource (part 3b) should be removed. As this is not identified as a requirement in the NPPF and is also changeable metric. Sufficient supply and best use of resource is more important to secure their long-term conservation.</p> <p>We do not agree with Paragraph 12.32 (MIN2 justification) - mineral sterilisation only occurring in regard to development sites in excess of 5 hectares in size and that developments must be accompanied by supporting information to demonstrate that mineral resources would be needlessly sterilised. This is contrary to MIN2s' approach. The judgement on mineral extraction having detrimental impact on neighbouring uses predetermines the findings of environmental assessment work that may accompany a mineral extraction scheme.</p> <ul style="list-style-type: none"> <li>Support for paragraph 7 of Policy MIN2 protecting Mineral Infrastructure Sites from incompatible development, including a 150m buffer.</li> </ul>
MIN4	<p><b>Local Authority</b></p> <ul style="list-style-type: none"> <li>Consideration could be given to minerals site restoration in assisting in the delivery of wider strategic objectives such as the Nature Recovery Network.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Policy MIN4 clause 9b is insufficient. Preferably, we want to see the allocation of appropriate minerals sites accompanied by site specific policies detailing the relevant considerations per site and any avoidance and mitigation measures based off of a heritage impact assessment. This should be accompanied by site specific appropriate restoration principles.</li> </ul> <p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>Amend wording to MIN4: We would strongly advise that paragraph 6 is made more robust to ensure that restoration maximises natural capital and ecosystem services provision to: "local people, by providing better</li> </ul>

	<p>facilities for public rights of way users and access to nature in general, and wildlife, by linking in with the Nature Recovery Network, existing green infrastructure and the opportunities identified on the Black Country Local Nature Recovery Opportunity Map (draft April 2021) (18 Appendix -Nature Recovery Network – page 723). Restoration proposals should aim to create high quality priority wildlife habitats. Restoration should include provision for appropriate aftercare of the site, especially where priority habitat has been created."</p> <ul style="list-style-type: none"> <li>• We would advise some additional wording to 9) b) "effects on natural (existing and potential components of ecological networks), built, and historic (including archaeological) environments and on public health"</li> </ul>
	<p><b>Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Policy MIN4 gives the impression that the included criteria are the only ones to be considered. It should state that minerals proposals will also need to comply with the requirements of relevant policies in other chapters of the plan (including policy ENV7).</li> </ul>

**13) Sub-Areas and Site Allocations  
A. Wolverhampton**

**Summary of key site specific responses**

<b>Policy, site allocation or main heading</b>	<b>Number in Support</b>	<b>Number Objecting</b>	<b>Number commenting</b>
Policy CSA1 – Bushbury Strategic Allocation (WOH257, WOH258, WOH259, WOH260)	2	45	0
Policy CSA2 – Fallings Park Strategic Allocation (WOH262, WOH263, WOH264, WOH271)	5	35	0
WOH274 Fmr Wolverhampton Environment Centre (WEC), Westacre Crescent, Finchfield	0	150	0
WOH266 City of Wolverhampton College / Activity Centre, Paget Road, Compton Park	0	2	0
WOH193/WOH194 Fmr St Luke’s School, Goldthorn Road	0	29	0
WOH273 Moseley Road Open Space (part), Langdale Drive, Bilston	0	1003	0
<b>TOTAL</b>	<b>7</b>	<b>1264</b>	<b>0</b>

\*Approximate

**Chapter 13-D: City of Wolverhampton Sub-Area**

<b>Policy, Proposal or Main Heading</b>	<b>Key Issues Raised by the Representations (Residents and Stakeholders)</b>
<p><b>Green Belt release sites:</b></p> <p>Policy CSA1 – Bushbury Strategic Allocation (WOH257, WOH258, WOH259, WOH260)</p>	<p><b>Objections</b></p> <p>A number of objections were received against the proposed release of Green Belt sites for development allocations, which included the following issues:</p>

Policy, Proposal or Main Heading	Key Issues Raised by the Representations (Residents and Stakeholders)
<p>Policy CSA2 – Fallings Park Strategic Allocation (WOH262, WOH263, WOH264, WOH271)</p> <p>WOH274 Fmr Wolverhampton Environment Centre (WEC), Westacre Crescent, Finchfield</p> <p>WOH266 City of Wolverhampton College / Activity Centre, Paget Road, Compton Park</p>	<ul style="list-style-type: none"> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes health services/ schools/ youth services/ sewage and waste/ emergency services (fear of increased crime).</li> <li>• Concerns about the impact on the existing road network, including increased congestion, accidents and lack of public transport.</li> <li>• Loss of Greenbelt (GB) land, this included that there is currently not enough open space and GB, building on this site would set a precedent for building on GB and objections over the loss of recreational and amenity value of GB/ Greenspace, including the loss of outlook/views, impact on health and loss of amenity space for walking/exercising.</li> <li>• Allocation of this site is contrary to National Policy (NPPF) as no exceptional circumstances for GB release and Paragraph 175.</li> <li>• Detrimental impact on the ecology and biodiversity of the site, including loss of wildlife, habitats and flora, the impact of the hedgerows (in some sites these are designated as SLINC), loss of trees and impacts on surrounding nature conservation sites. Concerns were raised regarding the lack of ecology surveys as part of the assessment process.</li> <li>• Development would result in the loss of Grade 2 and 3 good quality agricultural land.</li> <li>• Development would result in increased pollution (air/noise/light) and have a negative impact on air quality. Concerns were raised regarding the impact on the area during constructions (e.g., dust/ air and water pollution/ increased traffic/ visuals and smells during construction)</li> <li>• No economic benefit to the area, house prices of existing properties will be reduced, and the new homes won't be affordable, they will be high value homes.</li> </ul>

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(Residents and Stakeholders)</i>
	<ul style="list-style-type: none"> <li>• Cumulative impact of other developments in the areas. For the sites located in the Kingswinford/Wall Heath area this included comments regarding there being more developments in Kingswinford area than any other part of the borough, and result in the loss of the village feel/ change the nature of the area.</li> <li>• A brownfield first approach should be taken, as its part of local and national government manifesto and CBRE have stated that there is space for a million homes on brownfield land across the country. There are still other Brownfield sites available, more building in town centres or using the existing empty dwellings including council houses, using disused commercial buildings (e.g., shops, warehouses, offices and pubs) and higher density developments on proposed brownfield site. The Midlands Mayor opposes building on GB, stating there is plenty of brownfield sites.</li> <li>• Other issues raised: concerns regarding flood risk; global warming; impact on heritage and the surrounding landscape; impact on existing residents such as loss of privacy; the Government's housing targets are too high and the councils shouldn't aim to meet them; data used to calculate housing need should be reviewed post Brexit and the pandemic.</li> </ul>
Policy CSA1 – Bushbury Strategic Allocation (WOH257, WOH258, WOH259, WOH260)	<ol style="list-style-type: none"> <li>1. Land should not be developed because that would cause unacceptable: <ul style="list-style-type: none"> <li>• environmental damage, particularly to the natural and historic environment;</li> <li>• loss of valuable local open space</li> <li>• increased pressure on local infrastructure, including schools and health services;</li> <li>• increased traffic congestion and highway safety issues;</li> <li>• increased flood risk</li> </ul> </li> </ol>

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(Residents and Stakeholders)</i>
Policy CSA2 – Fallings Park Strategic Allocation (WOH262, WOH263, WOH264, WOH271)	<p>2. Brownfield/ non green belt land should be used first.</p> <p>1. Land should not be developed because that would cause unacceptable:</p> <ul style="list-style-type: none"> <li>• environmental damage, particularly to the natural environment;</li> <li>• loss of valuable local open space</li> <li>• increased pressure on local infrastructure, including schools and health services;</li> <li>• increased traffic congestion and highway safety issues;</li> <li>• increased flood risk</li> </ul> <p>2. Brownfield/ non green belt land should be used first.</p>
WOH193/WOH194 Fmr St Luke’s School, Goldthorn Road	<p>1. Land should not be developed because that would cause unacceptable:</p> <ul style="list-style-type: none"> <li>• environmental damage;</li> <li>• increased pressure on local infrastructure;</li> <li>• increased traffic congestion and highway safety issues;</li> </ul> <p>2. Brownfield land should be used first.</p> <p>3. Site is likely to be needed for education purposes.</p>
WOH273 Moseley Road Open Space (part), Langdale Drive, Bilston	<p>1. Land should not be developed because that would cause unacceptable:</p> <ul style="list-style-type: none"> <li>• environmental damage;</li> <li>• loss of valuable local open space</li> <li>• increased pressure on local infrastructure;</li> <li>• increased traffic congestion and highway safety issues;</li> </ul> <p>2. Brownfield land should be used first.</p>
WOH274 Fmr Wolverhampton Environment Centre (WEC), Westacre Crescent, Finchfield	<p>1. Land should not be developed because that would cause unacceptable:</p> <ul style="list-style-type: none"> <li>• environmental damage, particularly to the natural environment;</li> <li>• loss of valuable local open space</li> </ul>

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(Residents and Stakeholders)</i>
	<ul style="list-style-type: none"> <li>• increased pressure on local infrastructure;</li> <li>• increased traffic congestion and highway safety issues;</li> <li>• increased flood risk</li> </ul> <p>2. The site is not brownfield - brownfield/ non green belt land should be used first.</p>
<p>WOH185 Alexander Metals Open Space</p> <p>WOH186 East of Qualcast Road</p> <p>WOH198 Beckminster House, Beckminster Road</p> <p>WOH257 Northycote Lane, Bushbury</p> <p>WOH258/WOH259 South/North of Moseley Road, Bushbury</p> <p>WOH261/WOH269/ WOH270 Oxley Park Golf Club sites</p> <p>WOH263/WOH271 Land North of Grassy Lane, Land East of Wood Hayes Road</p> <p>WOH267 South Staffs Golf Course</p> <p>WOH273 Moseley Road Open Space</p> <p>WHO274 Fmr Wolverhampton Environment Centre, Westacre Crescent</p> <p>WOE737 Bilston Urban Village</p>	<p><b>Wildlife Trust for Birmingham &amp; the Black Country</b></p> <p>1. The Black Country Plan site assessment process should not have selected these sites, for one or more of the following reasons:</p> <ul style="list-style-type: none"> <li>• Part / all of site is a designated Site of Local Importance for Nature Conservation;</li> <li>• Part / all of site has been identified as a Potential Site of Importance for Nature Conservation by WTBBC / EcoRecord;</li> <li>• A Birmingham and Black Country Local (wildlife) Site Assessment report is required to provide evidence to inform the Black Country Plan site assessment process;</li> <li>• There is high potential for / evidence of the presence of priority habitats and species on part / all of the site;</li> <li>• Part / all of the site scored highly in the Draft Black Country Local Nature Recovery Strategy</li> </ul>

Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(Residents and Stakeholders)</i>
<p>WOE703 Deans Road / Neachells Lane</p> <p>WOE735 South of Citadel Junction</p> <p>WOE662 Fmr MEB site, Major St / Dixon St</p> <p>WOE755 Rolls Royce Playing Field, Spring Road</p> <p>WOE725 Wolverhampton Business Park</p> <p>WOE698 Phoenix Road</p> <p>WOE694 Land behind Keyline Builders Merchants, Neachells Lane / Moose Lane</p> <p>WOE727 Mammoth Drive, Wolverhampton Science Park</p> <p>WOE726 Stratosphere Site, Wolverhampton Science Park</p> <p>WOE734 Springvale Avenue</p>	
<p>WOE723 Gas Holder Site, Wolverhampton Science Park</p> <p>WOE681 Cross Street North / Crown Street</p> <p>WOE757 Inverclyde Drive</p> <p>WOE759 Powerhouse, Commercial Road</p>	<p><b>Wildlife Trust for Birmingham &amp; the Black Country</b></p> <ol style="list-style-type: none"> <li>1. The site is adjacent to a SLINC or SINC, therefore any development should take into account the wildlife value of adjoining land and deliver enhancements to the Local Nature Recovery Network.</li> </ol>



Policy, Proposal or Main Heading	Key Issues Raised by the Representations <i>(Residents and Stakeholders)</i>
WOE658 Millfields Rd, Ettingshall	
Unallocated:  Land at Pennwood, known as Seven Cornfields	<ol style="list-style-type: none"> <li>1. Support omission of Land at Pennwood (Seven Cornfields site) from list of housing allocations.</li> <li>2. Site is suitable for housing and should be a housing allocation</li> <li>3. The proposal for Land at Pennwood has been subject to a preliminary heritage assessment and recognises and respects the Sedgley Park Area of High Historic Landscape Value by retaining a view corridor to the south.</li> </ol>
Unallocated:  Former Oxley Day Care Centre	<ol style="list-style-type: none"> <li>1. Site is suitable for housing and should be a housing allocation.</li> </ol>