



HOUSE OF COMMONS

LONDON SW1A 0AA

Black Country Plan  
Planning & Regeneration  
Council House  
Priory Road  
Dudley  
DY1 1HF

Our Ref: WM6177/JJM

11 October 2021

As one of the thirteen Members of Parliament in the Black Country area I welcome the opportunity to comment on the proposed new Draft Plan that includes my Aldridge-Brownhills constituency.

In recognizing that there is a requirement on the part of all local planning authorities to undertake a Local Plan that identifies where development will take place over a 20-year framework, the Plan in its current form is significantly flawed particularly in the Borough of Walsall and in large parts of the eastern flank of the Borough which includes the entire Aldridge-Brownhills constituency.

Throughout this submission I wish to outline how in repeated instances the land proposed in the Plan, which for a large part is for development on designated Green Belt, fundamentally goes against public opinion and planning guidance. Whilst accepting that there are to be further iterations of this document it is important that these concerns are expressed at this stage of the process, and addressed.

I note that under the heading 'What does this mean for Walsall?' the following figures are quoted: -

- Additional Land needed to build additional homes: 13,344

To be provided as follows: -

- Urban areas and Brownfield sites: 7,928
- Green Belt sites: 5,418

However, throughout the proposed Plan there is no information available to explain the rationale for how these figures have been derived. Furthermore, if these figures are extrapolated over a 20 year period they are likely to be over exaggerated, and certainly not reflective of need.

The Office for National Statistics states:-

"The UK population growth rate from mid-2018 to mid-2019 was at 0.5% slower than any year since mid-2004".

In addition it states:-

“migration has continued to be the main driver of UK population growth since the 1990s”.

On the basis that there is falling migration and a falling UK population growth rate, the forecast number of homes used for the purpose of the Black Country Plan is over exaggerated and must be revised downwards before moving forward. Furthermore it takes no account of the impact on business or housing needs as we emerge from the Coronavirus pandemic.

Yet for the purpose of the Black Country Plan there is an inbuilt assumption that these figures are accurate, thus locking communities across my Aldridge-Brownhills constituency into a plan that is fundamentally unfair and which at its heart devastates several of our most valuable Green Belt sites and our natural environment, at a time when the focus should be on building back better, greener and more sustainably. A key way to achieve this is to develop on brownfield sites first, of which we have many across the West Midlands, and focus as a priority on our town and urban/district centres.

Constituents from across Aldridge-Brownhills would be forgiven for not sharing the sentiments set out in the Black Country Plan where in Paragraph 4.6 it states: -  
“The BCP adopts a brownfield-first approach to maximise delivery of development within the urban area”.

As a community we are on the urban fringe of the West Midlands ‘Metro’ conurbation and I am still seeking to understand in the Borough of Walsall the extent to which that policy has been put into practice.

Furthermore in the same paragraph the authors of the Plan undermine their opening statement by declaring:-

“however, poor ground conditions are a legacy of the Black Country’s mining and industrial past are a significant constraint, in both physical and financial terms”. This assertion must be challenged.

In recent years, we have seen the steps taken and significant investment to successfully assist with the remediation of brownfield sites for housing. The United Kingdom is on the verge of playing global host to the UN Climate Change Conference (COP 26), yet it is unclear what full and proper assessment has been undertaken of all available brownfield sites in my constituency ahead of proposing large swathes of development on existing Green Belt sites.

It is extremely disappointing that the Black Country Plan fails to live up to its brownfield first policy aspiration, nor even recognises the value and multiple benefits that such a policy and protections would create.

By failing to live up to that policy the Green Belt will undoubtedly be sacrificed first, our communities and environment damaged and the opportunity to regenerate urban and brownfield sites lost for a generation, if not forever.

Turning again to the figures on which this Plan is based and even on the basis of the flawed starting point of 13,344 units required over 20 years, this equates to 667 units per year. Adopting an urban and brownfield sites first policy would provide 12 years of homes without having to touch any of the Green Belt sites.

If the trajectory of population growth continues to fall and migration flows reduce, the preservation of our Green Belt would endure for longer, if not indefinitely, whilst housing need can be met on brownfield sites, and our towns and district centres are regenerated and reinvigorated to be able to meet the challenge of the post Covid-19 era and provide the needed homes.

Without such a commitment to uphold the development of brownfield sites first, developers will simply continue to choose Green Belt sites over brownfield sites seeing them as the easier and cheaper model for development.

The stated aims of the Green Belt and the protections that it is given are well documented. There should be no de-designation of existing Green Belt.

As identified in the National Planning Policy Framework, the Green Belt serves 5 key purposes. Key amongst those objectives is to check the unrestricted sprawl of large built up areas.

On all of the key sites identified on Green Belt land in my Aldridge-Brownhills constituency, these principles are being set to one side to meet questionable targets and quotas that for the reasons I have identified above have not been justified in the Plan.

The Plan states, "the density of housing development in the existing urban areas will be increased to ensure that the land is used efficiently". There is widespread support to ensure the better utilisation of existing development land especially were it allows an increase in density and infilling for new homes, however there are no details or examples contained within the Plan as to how this can be fully achieved.

Whilst such an approach is to be welcomed, to fully understand whether this approach has been adopted by the Plan more information is required, particularly to understand if these are reflected in the proposed numbers.

Strategic Priorities 3 and 4 contained within the Plan carry widespread public support: -

"to provide a range and choice of accommodation, house types and tenures to meet the needs of current and future residents".

"to improve and diversify the Black Country housing offer".

However, the proposed Plan identifies a large number of sites within the Aldridge-Brownhills constituency that will certainly not meet the identified strategic priorities as set out. The average spend by a first time buyer across England stands at £205,246. Average house prices in Aldridge, Pelsall and Streetly all stand above the average first time buyer rate and the West Midlands average.

Indeed, in the case of two of the proposed sites (Aldridge Road/Queslett Road East and Stonnall Road) average prices based on the West Midlands average are between 51% and 110% higher.

Several of the current proposed sites will not manage to meet the stated objectives in these strategic priorities, they could in fact further fuel levels of unaffordability as this proposed plan will not provide the necessary housing mix.

In seeking to achieve a balanced plan, I applaud the aim of seeking to enhance the vitality of our town centres. Key Government support projects prior to and since the Covid-19 pandemic seek to recognise the changing face of our High Streets and Village Centres.

Yet the Black Country Plan fails to take full advantage of any changing High Street within my own constituency. All of the development is predominately focussed on existing Green Belt sites and on the outskirts of Village Centres well away from our High Streets.

Transport Infrastructure and the enhancement of sustainable and active travel are to be applauded and should be central to any development plan, but it is unclear from within the proposed plan how this will be underpinned by the current document.

A number of the proposed sites across Aldridge-Brownhills currently suffer from severe daily congestion, including Aldridge Road/Queslett Road East, Wolverhampton Road, Pelsall Road/Clayhanger junction and Stonnall Road.

Large parts of the road network cannot cope with the existing number of properties/vehicles, in the case of the proposed Aldridge Road/Queslett Road site the imposition of 960 properties most of which would turn right towards Birmingham would lead to even further increased gridlock in both directions given at the same time more than 1,900 school children are currently seeking to access the existing road network.

Whilst constituents would welcome steps towards more sustainable levels of transportation, it is highly questionable as to whether we can justify attempting to take these vital necessary steps when there is a lack of detailed transport modelling to accompany the proposed plan. Further, Paragraph 4.9 supports the fact that this has not happened and only remains 'on-going'. Improved sustainable travel will not account for the loss of the natural environment with large swathes of Green Belt being lost for a future generation.

No proper thinking has underpinned education needs and the impact that the proposed sites in Aldridge-Brownhills would place on the already pressured school network. With large numbers of schools across the constituency already at capacity and the pressure of the additional number of homes being proposed, I am concerned as the Member of Parliament that schools would not be able to accommodate such an influx of new development.

Equally, across my Aldridge-Brownhills constituency, we have witnessed in recent years an increase in the amount of flooding that has taken place in areas where the Black Country Plan has proposed a large number of these new properties. Areas such as Wolverhampton Road and Aldridge Road/Queslett Road East sites have had repeated instances of flooding in recent years including the flooding of homes.

To remove even more natural soakaway in several of these areas would have a detrimental effect on existing residents. This should not be overlooked at the initial stages of site allocation/preference in this Plan as it should include work on the existing drains and sewers too.

The importance of Green Belt and Green Open Spaces came to the fore at the start of the Covid-19 pandemic, when people being allowed to go out for exercise for one hour per day supported personal health and wellbeing. Whilst none of us will wish to go back into such stringent lockdown arrangements ever again it did open our eyes to the importance of open spaces and the natural beauty of the environment which exists around us. Another point overlooked in the current Plan is that of the wider environment and the impact of this Plan on woodland, hedges, natural habitats and the loss of valuable far land currently used for food production.

Whilst acknowledging that the current consultation has worked within the framework of the statutory guidelines set down, I do not believe that it has worked within the spirit.

A more rigorous communication plan should have been in place to raise the spectre of the importance of this consultation particularly in areas which could potentially be most affected by any future plan to implement.

A more rigorous communication plan should have been in place to raise the spectre of the importance of this consultation particularly in areas which could potentially be most affected by any future plan to implement.

In my own constituency Councillors alongside volunteers have been left to play their civic role in seeking to encourage large-scale participation, but we all believe that this should have been backed up with greater central co-ordination.

There is widespread understanding amongst residents from my Aldridge-Brownhills constituency that we need to plan new homes for future generations, the only question we would ask is do we have to facilitate these whilst destroying some of our most precious Green Belt and Open Spaces?

**The latest iteration of this Plan is unacceptable to me as the Member of Parliament for Aldridge-Brownhills and to large numbers of my constituents who have contributed to this consultation.**

**In responding to your consultation, I am insisting, on behalf of the constituency of Aldridge-Brownhills, that the Black Country Plan lives up to its own aspiration to promote a development policy of Brownfield First.**

As such I am expecting this plan Switches the Strategy back to Brownfield First and away from Green Belt, for the reasons identified by myself and the many contributors to this consultation.

At the start of this consultation process, I opened my own petition for this Plan to return to its core principles and some 2,611 have signed from across Aldridge-Brownhills to 'Switch the Strategy' back to Brownfield First. All of this information is appended to my submission.

Green Belt sites can only be developed once, and we owe it to all the future generations of this country in an era of environmental vigilance to protect designated Green Belt sites and adopt a policy of Brownfield First development. On behalf of my constituents from Aldridge-Brownhills I urge the next iteration of this strategy to do exactly that.

A Brownfield First policy approach, coupled with regeneration of our High Streets and Urban Districts, infilling and improved density can produce all the homes we need, without encroaching on the Green Belt.

Across the globe as we emerge from the pandemic global thinking is dictating that we Build Back Better. At the heart of that is to Build Back Better and Greener – something at this stage the Black Country Plan fails to achieve.

Yours sincerely,

