



Coventry City Council

To all Members of the Council

1 December 2008

Our ref: C/RKB

Dear Councillor,

Extraordinary Meeting of the City Council on 2 December 2008

The agenda and papers for tomorrow afternoon's extraordinary meeting of the City Council were despatched to members on 24 November 2008.

Item 3.1 on the agenda relates to "**West Midlands Spatial Strategy – Phase Two Revision (Preferred Option) and the NLP Study**".

Attached to this letter is a report on the above matter considered by the West Midlands Planning and Transportation Sub-Committee at their meeting last Friday (28 November 2008), when they approved the recommendations contained therein.

In addition, attached is a report on this matter considered by the Coventry/Solihull/Warwickshire Forum at their meeting also last Friday (28 November), when they approved recommendation (1) and agreed an amendment to recommendation (2) to read "The Forum reiterates its support for the Sub Regional Strategy and strongly opposes the approach, methodology and conclusions of the NLP study which undermines and prejudices the objectives of the RSS".

Yours sincerely,

R.K. Brankowski

Principal Committee Officer

**Customer and Workforce Services
Directorate**

Bev Messinger
*Director of Customer and Workforce
Services*
Council House
Earl Street
Coventry CV1 5RR

Telephone 024 7683 3333
DX 18868 COVENTRY 2
Minicom 024 7683 3029

Please contact Richard Brankowski
Direct line 024 7683 3077
Fax 024 7683 3070
Richard.Brankowski@coventry.gov.uk



WEST MIDLANDS PLANNING AND TRANSPORTATION SUB-COMMITTEE

28th November 2008

**WEST MIDLANDS REGIONAL SPATIAL STRATEGY (RSS) PHASE TWO
REVISION AND NATHANIEL LICHFIELD STUDY – A PROPOSED RESPONSE**

1. PURPOSE OF REPORT

- 1.1. To advise Members of the contents and potential implications of the above and to propose a formal response.

2. RECOMMENDATIONS

- 2.1. That the Sub Committee:

- (i) To note the contents of the report.
- (ii) To agree that formal representations (as set out in Appendix 3), based on supporting policies and strategies contained in the RSS Phase Two Revision, are sent to Government Office for the West Midlands and the West Midlands Regional Assembly
- (iii) To agree that separate representations (as set out in Appendix 4) on the Nathaniel Lichfield and Partners study are sent to Government Office for the West Midlands and the West Midlands Regional Assembly
- (iv) To delegate responsibility to Officers to 'fine tune' these representations for final agreement by the Chairman, Vice Chairman and Opposition Spokesperson in advance of the 8th December deadline.

3. BACKGROUND

- 3.1. As Members will be well aware, the RSS Phase Two Preferred Option was submitted to Government in December 2007 for Examination in Public (EiP) by an independent Panel. In January 2008, Baroness Andrews wrote to the West Midlands Regional Assembly (WMRA) advising that Government was commissioning consultants to consider options for accommodating additional housing within the Region in line with aspirations to increase housing supply set out in the Housing Green Paper.
- 3.2. Consultant Nathaniel Lichfield and Partners (NLP) was commissioned by Government Office for the West Midlands (GOWM) to undertake this work and a final report was published on 7th October 2008.
- 3.3. This process is unprecedented in that the EiP has been delayed by approximately six months and the consultation period extended accordingly in order that GOWM and other parties can consider this study as further evidence when making their representations.
- 3.4. Whilst the RSS is not directly linked to resources, it is used as a basis for distributing significant levels of public funding and also directs private sector investment. For example, it is a main factor in developing the ongoing Round Two Regional Funding Allocations.

4. REPORT DETAILS

The 2004 Regional Spatial Strategy – A Fundamental Change of Direction

- 4.1. The RSS, as adopted in 2004, introduced a fundamental change of direction for regional spatial planning in the West Midlands. Rather than continuing to plan for continued decentralisation to satellite settlements beyond the Metropolitan and North Staffordshire Major Urban Areas (MUAs), it proposed simultaneous Urban and Rural Renaissances whereby the requisite areas would increasingly meet their own needs.
- 4.2. In practise, this implied higher rates of development and bringing forward previously developed land within the MUAs so as to prevent selective out migration and unsustainable commuting patterns. Rural areas and most other settlements would no longer accommodate out migration but instead focus on meeting locally generated needs. Five Sub-Regional Foci (Telford, Worcester, Rugby, Shrewsbury and Hereford) were identified to accommodate longer term development needs beyond the MUAs.
- 4.3. Formal monitoring of the adopted strategy suggests that whilst progress towards the Urban Renaissance is slow and mixed, there are some encouraging signs. It must also be borne in mind that it is a long term strategy that has only formally been in place for four years and that it is seeking to reverse deep rooted unsustainable trends.
- 4.4. Following formal adoption in 2004, it was agreed with Government to undertake three partial revisions of the RSS. The purpose of these was to develop the existing strategy and provide further clarification and guidance as necessary and not to fundamentally review the underlying Urban and Rural Renaissance principles.
 - The RSS Phase One Revision: The Black Country, as published by Government in January 2008 introduced a suite of policies specific to the Sub-Region to assist in the delivery of Urban Renaissance.
 - The RSS Phase Three Revision considers strategic environmental matters, Gypsies and Travellers, culture, rural services and minerals. An Issues and Options Paper is scheduled for publication after the Phase Revision EiP.

The RSS Phase Two Revision

- 4.5. The RSS Phase Two Revision is the most substantial of the three in that it seeks to roll the strategy forward from 2021 to 2026 in the light of revised 2004 based household projections. It also embraces the following:
 - Introduces a suite of Sustainable Region policies
 - Strengthens the Sub-Regional aspects of the RSS
 - Replaces the *Sub Regional Foci* for longer term development (Worcester, Telford, Shrewsbury, Hereford and Rugby) with *Settlements of Significant Development* (Worcester, Telford, Shrewsbury, Hereford, Rugby, Burton upon Trent, Stafford, Nuneaton / Bedworth, Warwick / Leamington Spa and Redditch)
 - Permits selective release of Green Belt for residential development in very exceptional circumstances

- Gives guidance on employment land, retail and office requirements.
 - Introduces new policies identifying broad locations for waste management facilities and the amount of provision to be made by each Waste Planning Authority.
- 4.6. The level and distribution of housing growth is consistent with that agreed by P&T Sub Committee at its February 2007 meeting. It was acknowledged that this reflected established strategies based on meeting housing need and delivering regeneration and growth within prioritised built up areas across the Metropolitan Area as a whole, combined with a north / south growth corridor linking Nuneaton / Bedworth to Warwick / Leamington via Coventry (the Urban Renaissance Strategy).
- 4.7. The RSS Phase Two Revision is not intended to be a fundamental review of RSS policies and principles, instead it is an update which takes into account new information and provides clarification of existing policies

The GOWM Commissioned Nathaniel Lichfield and Partners (NLP) Study

- 4.8. The NLP study is largely predicated on the advice of the National Housing and Planning Advisory Unit (NHPAU). This Government sponsored body has been set up in order to explore what level of additional housing growth is required to improve housing affordability in line with its Green Paper aspirations.
- 4.9. The study was published on October 7th 2008 and identified three scenarios which suggest how additional housing provision could be delivered (over and above the 365,000 identified in RSS 2 Preferred Option) by 2026.
- Scenario 1 - 'South East Focus': 51,500 additional dwellings
 - Scenario 2 - 'Spreading Growth': 54,000 additional dwellings
 - Scenario 3 - 'Maximising Growth': 80,000 additional dwellings
- 4.10. A summary of the scenarios is included as Appendix 1.
- 4.11. In short, the three options include:
- Higher levels of housing for Birmingham (an additional 10,000 across all scenarios) and Solihull (between 5000 and 13000 additional dwellings).
 - No additional housing for Coventry or the Black Country under any of the scenarios.
 - Up to 19,500 additional dwellings in Warwickshire, 13,400 in Worcestershire, 8,000 in Staffordshire (exc. North Staffs. MUA), 1,900 in Shropshire and up to 10,000 in Telford and Wrekin.
- 4.12. The detailed proposed Region-wide distribution of these additional dwellings under each scenario is indicated in the attached table (Appendix 2).
- 4.13. NLP point out that the scenarios are 'potential scenarios' and that none of them should be considered as the 'preferred' option for the Region or the optimum outcome. The scenarios are currently not Government policy.

Comments on the Nathaniel Lichfield Study

- 4.14. The below high level observations on the study are well rehearsed and supported by many other regional stakeholders.

- It is based overtly on trend based analysis and projections which are themselves challengeable and is arithmetically rather than policy driven.
- It is one dimensional in focusing overtly on supply side factors (as does the NHPAU work) rather than identified needs and does not fully address environmental and social implications.
- The study's conclusions go beyond the scope of the RSS Phase Two Revision. It undermines the urban regeneration and growth based policies currently supported by Metropolitan Authorities as all scenarios lead, to varying degrees, to a greater concentration of growth in the south / south east of the Region.
- It will require delivery at unprecedented levels and it is unclear whether sufficient infrastructure will be in place, raw materials available or whether the development and construction industries will have the capacity to deliver.
- It has been prepared in a 'top down' manner and does not fully explore local impacts.
- It is based on a limited evidence base drawing primarily on views from the development industry.

4.15. In sub-regional terms, likely implications are as follows:

- In Birmingham and Solihull there will inevitably be pressures to release land, including that within the Green Belt, for higher levels of housing growth. The scale of growth proposed could potentially impact on infrastructure that serves regional assets (e.g. BIA, NEC) and so potentially prejudice their continued viability and success.
- In Coventry, the study does not reflect the north / south growth corridor strategy and additional growth directed to Warwickshire could undermine this approach if not phased carefully.
- Although no additional growth is proposed in the Black Country, the study questions the delivery of RSS Phase Two Preferred Option growth allocations and consequently may well be used to undermine regeneration strategies being progressed through the Joint Core Strategy.

Response Strategy

4.16. P&T Sub Committee has previously endorsed the need to respond collectively and this response has been drawn up by all authorities with core principles being reflected in individual authorities' responses. There has been close liaison with WMRA as the Regional Planning Partnership has also expressed the need for collective support of the RSS Phase Two Revision as submitted.

4.17. It is stressed that it is the RSS Two Preferred Option that is to be subject to EiP and not the NLP study and its recommendations, which is effectively further evidence upon which GOWM (and other stakeholders) will draw on when framing representations. The Panel has, however, advised that it would appreciate separate comments specifically on the NLP study as presumably these will assist it in identifying matters for further discussion at the EiP.

- 4.18. Whilst it is unknown how GOWM will use the study, it is inevitable that other parties will draw on its conclusions to discredit the RSS Phase Two Revision. Consequently, it is imperative that any Metropolitan Area representations are mindful of this.
- 4.19. Given the time lag since the submission of the RSS Phase Two Revision there have been further circumstantial changes which representations need to take account of, most notably the economic downturn and credit crunch.
- 4.20. A summary of the proposed response strategy and key issues that need to be raised is set out below; further details can be viewed in Appendix 3.
- Reiterate that the Urban Renaissance Strategy is not being fundamentally reviewed.
 - Stress that housing requirements set out in the RSS Phase Two revision are minimum requirements for the Metropolitan Area and that there is a willingness to exceed these within the confines of existing strategies and subject to resource availability.
 - Support the policies as set out in the RSS Phase Two Revision but seek constructive amendment of certain policies in the light of the circumstantial changes identified above.
 - More specifically, given the current housing market downturn, the adopted RSS housing trajectory is not being met and delivery will inevitably be backloaded towards the plan's latter periods. There is a concern that when the market shows signs of recovery (regardless of the overall level of housing proposed), there will be speculative pressures for the release of sites outside of the MUAs in order to provide an early market stimulus and that this could undermine early delivery of the Urban Renaissance strategy.
 - In the light of the above, the main focus of these representations will be on the Communities for the Future policies
 - Identify key policy areas which should not be changed, namely those that are fundamental to delivery of the Urban Renaissance, which may be challenged by other parties.
 - Identify the likely changes for other policy areas (retail, office, employment land), which may result as a consequence of any change in the level, distribution and phasing of housing delivery.
 - Seek amendment of policies in the light of further research / announcements since December 2007 e.g. results of the Metropolitan Area's study into road pricing under auspices of Government's Transport Innovation Fund.
 - Seek general clarification and reiterate against duplication of higher level policy.
- 4.21. In accordance with the Panel's request, it is also proposed to respond separately to the NLP study and more detailed responses to its conclusions are attached as Appendix 4.

Next Steps

- 4.22. Subject to Member endorsement, Officers will firm up representations and submit them to GOWM and WMRA by the 8th December deadline. It is

imperative that sufficient 'hooks' are in place in order that supplementary evidence can be submitted.

4.23. Following the deadline for submitting representations, the Panel will consider all responses and decide upon the matters it wishes to see addressed and who should be represented. All parties will have to submit final papers to the Panel by the end of March 2009.

4.24. The EiP is scheduled to take place between late April – early July 2009 (exact dates still to be confirmed) at Molineux Stadium, Wolverhampton.

4.25. It is of note that whilst the RSS Phase Two Revision considers the 2004 based household projections, publication of the 2006 based projections is imminent and that the Panel may wish to draw on these given that the EiP has been delayed. As yet there are no formal details as to what the implications of these updated projections may be.

5. **FINANCIAL IMPLICATIONS**

5.1. Mott MacDonald is being engaged through Commission Fund to help prepare the evidence base for the EIP; this fund is within existing budgets and is set aside for such use.

5.2. Discussions are ongoing amongst regional partners as to whether further specialist external advice is required to support the Metropolitan Area's case.

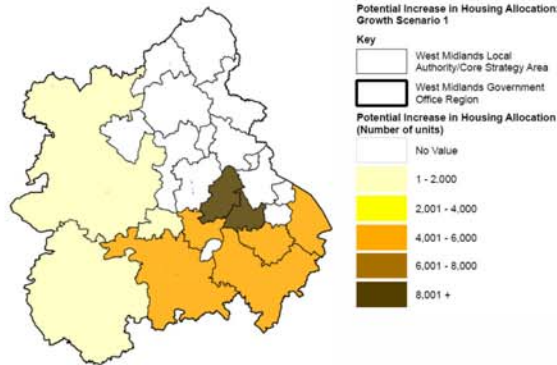
6. **SCHEDULE OF APPENDICES**

- **Appendix 1:** Summary of the Three NLP Study Scenarios
- **Appendix 2:** Schedule of proposed housing distribution (including net additions to existing dwelling stocks) under the three NLP scenarios
- **Appendix 3:** Summary of policy responses to RSS Phase Two Revision Policies
- **Appendix 4:** Summary of Responses to NLP Study Conclusions

7. **CONTACT**

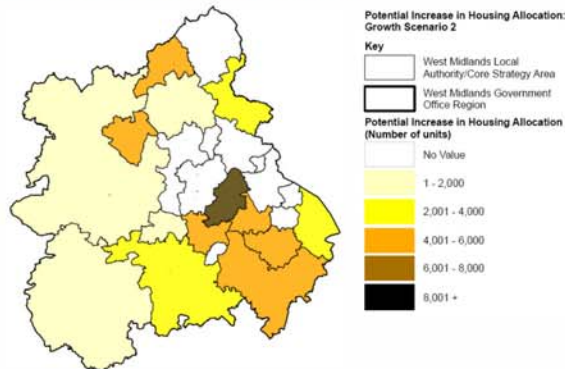
Core Support Team 0121 214 7353
e-mail: CEPOGCoreSupport@Centro.org.uk

Scenario 1: South East Focus



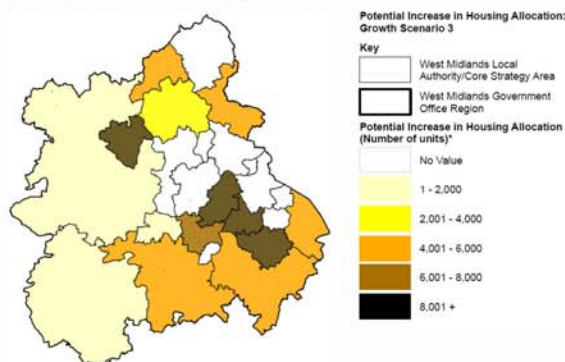
- Additional growth focused in the south east of the region and in the rural west
- 51,500 additional units
- 417,100 net additional dwellings up to 2026
- New settlement in Solihull District
- Links housing growth to economic growth

Scenario 2: Spreading Growth



- 54,000 additional units
- 419,600 net additional dwellings up to 2026
- South East focus but also capitalising on capacity for growth in North Staffordshire (which sits in a separate sub-regional market) and Telford and in the rural west
- Links housing growth to economic growth and areas of additional capacity and regeneration, with a spread across housing market areas.

Scenario 3: Maximising Growth



- 80,000 additional units
- 445,600 net additional dwellings up to 2026
- Additional growth across a range of locations including around the Metropolitan MUA, Staffordshire, Telford and in the rural west to address affordability issues.
- Focuses growth in areas of economic growth, affordability, capacity and regeneration, across a range of housing market areas.

NLP Scenarios and changes to dwelling stocks

Housing Stock at April 2007	Local Authority / Core Strategy Area	RSS Phase 2 Revision		Scenario 1 : South East Focus				Scenario 2 : Spreading Growth				Scenario 3 : Maximising Growth			
		Preferred Option (Net 2006-2026)	% Increase on Housing stock	Potential Increase	% Increase on Preferred Option (Net 2006-2026)	Total Housing Allocation for RSS	% Increase on Housing stock	Potential Increase	% Increase on Preferred Option (Net 2006-2026)	Total Housing Allocation for RSS	% Increase on Housing stock	Potential Increase	% Increase on Preferred Option (Net 2006-2026)	Total Housing Allocation for RSS	% Increase on Housing stock
415773	Birmingham	50,600	12.17%	10,000	19.76%	60,600	14.58%	10,000	19.76%	60,600	14.58%	10,000	19.76%	60,600	14.58%
129684	Coventry	33,500	25.83%	0	0.00%	33,500	25.83%	0	0.00%	33,500	25.83%	0	0.00%	33,500	25.83%
468979	Black Country	61,200	13.05%	0	0.00%	61,200	13.05%	0	0.00%	61,200	13.05%	0	0.00%	61,200	13.05%
87106	Solihull	7,600	8.73%	13,000	171.05%	20,600	23.65%	5,000	65.79%	12,600	14.47%	10,000	131.58%	17,600	20.21%
1101542	Metropolitan Area Total Shropshire	152,900	13.88%	23,000	15.04%	175,900	15.97%	15,000	9.81%	167,900	15.24%	20,000	13.08%	172,900	15.70%
66886	Telford and Wrekin	25,700		1,900	7.39%	27,600		1,900	7.39%	27,600		1,900	7.39%	27,600	
	Staffordshire (excl. North Staffs)	26,500	39.62%	0	0.00%	26,500	39.62%	5,000	18.87%	31,500	47.10%	10,000	37.74%	36,500	54.57%
301605	Cannock Chase	49,200	16.31%	0	0.00%	49,200	16.31%	4,000	8.13%	53,200	17.64%	8,000	16.26%	57,200	18.97%
40427	East Staffordshire	5,800	14.35%	0	0.00%	5,800	14.35%	0	0.00%	5,800	14.35%	0	0.00%	5,800	14.35%
46133	Lichfield	12,900	27.96%	0	0.00%	12,900	27.96%	2,500	19.38%	15,400	33.38%	5,000	38.76%	17,900	38.80%
41866	North Staffordshire	8,000	19.11%	0	0.00%	8,000	19.11%	0	0.00%	8,000	19.11%	0	0.00%	8,000	19.11%
44410	South Staffordshire	17,100		0	0.00%	17,100		6,000	35.09%	23,100		6,000	35.09%	23,100	
54880	Stafford	3,500	7.88%	0	0.00%	3,500	7.88%	0	0.00%	3,500	7.88%	0	0.00%	3,500	7.88%
42288	Staffordshire Moorlands	10,100	18.40%	0	0.00%	10,100	18.40%	1,500	14.85%	11,600	21.14%	3,000	29.70%	13,100	23.87%
31601	Tamworth	6,000	14.19%	0	0.00%	6,000	14.19%	0	0.00%	6,000	14.19%	0	0.00%	6,000	14.19%
231828	Warwickshire	2,900	9.18%	0	0.00%	2,900	9.18%	0	0.00%	2,900	9.18%	0	0.00%	2,900	9.18%
26286	North Warwickshire	41,000	17.69%	14,500	35.37%	55,500	23.94%	12,500	30.49%	53,500	23.08%	19,500	47.56%	60,500	26.10%
52917	Nuneaton and Bedworth	3,000	11.41%	0	0.00%	3,000	11.41%	0	0.00%	3,000	11.41%	0	0.00%	3,000	11.41%
41003	Rugby	10,800	20.41%	0	0.00%	10,800	20.41%	0	0.00%	10,800	20.41%	0	0.00%	10,800	20.41%
53115	Stratford-on-Avon	10,800	26.34%	5,000	46.30%	15,800	38.53%	3,000	27.78%	13,800	33.66%	5,000	46.30%	15,800	38.53%
58507	Warwick	5,600	10.54%	4,500	80.36%	10,100	19.02%	4,500	80.36%	10,100	19.02%	4,500	80.36%	10,100	19.02%
	Worcestershire	10,800	18.46%	5,000	46.30%	15,800	27.01%	5,000	46.30%	15,800	27.01%	10,000	92.59%	20,800	35.55%
38524	Bromsgrove	36,600		10,900	29.78%	47,500		8,400	22.95%	45,000		13,400	36.61%	50,000	
34612	Redditch	2,100	5.45%	5,000	238.10%	7,100	18.43%	5,000	238.10%	7,100	18.43%	7,500	357.14%	9,600	24.92%
44090	Wyre Forest	6,600	19.07%	0	0.00%	6,600	19.07%	0	0.00%	6,600	19.07%	0	0.00%	6,600	19.07%
78940	Herefordshire	24,500		5,500	22.45%	30,000		3,000	12.24%	27,500		5,500	22.45%	30,000	
	MUAs	3,400	7.71%	400	11.76%	3,800	8.62%	400	11.76%	3,800	8.62%	400	11.76%	3,800	8.62%
	Non-MUAs	169,100	21.03%	1,200	7.23%	17,800	22.55%	1,200	7.23%	17,800	22.55%	1,200	7.23%	17,800	22.55%
	HMA's	196,500		23,000	13.60%	193,000		21,000	12.42%	191,000		26,000	15.38%	196,000	
	North	28,500		14,500	14.50%	224,100		33,000	16.79%	228,600		54,000	27.48%	249,600	
	South	46,100		0	0.00%	46,100		10,000	21.69%	56,100		14,000	30.37%	60,100	
	Central C1	53,000		20,400	38.49%	73,400		17,900	33.77%	70,900		27,900	52.64%	80,900	
	Central C2	69,100		23,000	33.29%	92,100		15,000	21.71%	84,100		20,000	28.94%	89,100	
	Central C3	58,100		5,000	8.61%	63,100		3,000	5.16%	61,100		5,000	8.61%	63,100	
	West	97,000		0	0.00%	97,000		5,000	5.15%	102,000		10,000	10.31%	107,000	
	West Midlands Region	42,300		3,100	7.33%	45,400		3,100	7.33%	45,400		3,100	7.33%	45,400	
		365,600		51,500	14.09%	417,100		54,000	14.77%	419,600		80,000	21.88%	445,600	

Sustainable Region	
SR1: Climate Change	<ul style="list-style-type: none"> • Sentiment of policy supported. It should, however, make reference to the overall RSS strategy, which promotes a sustainable pattern of development, with areas increasingly meeting their own needs, and that this will help reduce carbon emissions when compared to a more dispersed settlement pattern.
SR2: Creating Sustainable Communities	<ul style="list-style-type: none"> • The guidance in this policy is supported although it needs to be ensured that national policy is not duplicated.
SR3: Sustainable Construction and Design	<ul style="list-style-type: none"> • Support policy approach but need to clarify that no duplication of nationally applicable standards and that blanket requirements do not unnecessarily stray into matters best determined locally.
SR4: Improving Air Quality for Sensitive Ecosystems	<ul style="list-style-type: none"> • Support policy approach and acknowledge that further development required through the RSS Phase Three Revision. Again ensure that higher level policy is not duplicated.
Communities for the Future	
General	<ul style="list-style-type: none"> • Ensure references to 'Metropolitan Area' / West Midlands Conurbation are consistent.
CF1: Housing within the MUAs	<ul style="list-style-type: none"> • Strongly support the retention of this policy principle which supports the Urban Renaissance • Stress that as requirements for Metropolitan MUAs are minima, sufficient resources are required. • Support recognition that renovation of existing stock is a priority as well as new build but request that 'replacement' of sub standard existing stock is referred to also.
CF2: Housing beyond the MUAs	<ul style="list-style-type: none"> • Support policy principles; i.e. introduction of Settlements of Significant Development (SSD) designation. • It must be made clear that ex MUA housing delivery must not compromise accelerated delivery of the Urban Renaissance. The policy should be amended to reflect this in the light of changing circumstances (credit crunch, lower build rates, back loading of delivery). Para 6.19 refers to the impact on MUAs of ex MUA development but the reference needs to be strengthened. • Ex MUA (both SSD/and non-SSD) requirements need to remain maxima (as in the case in adopted RSS).
CF3: Level and Distribution of New Housing Development	<ul style="list-style-type: none"> • Agree level and distribution as based on well grounded strategies to meet need and is justified in terms of PPS3 Housing.

	<ul style="list-style-type: none"> • The housing requirements are challenging in the light of adopted RSS requirements and this is exacerbated by the change in economic circumstances since submission of the RSS Phase Two Revision Preferred Option. As such, any large scale increase in requirements would be inappropriate and pose delivery risks e.g. capacity of the construction industry. • Whilst it considers trend based projections (as requested by PPS3), the level and distribution of new housing is policy led, in accordance with established Urban and Rural Renaissance principles. Any fundamental changes to the level and distribution of housing may undermine these principles. • Support continued expression of MUA figures as minimum requirements, making it clear that there is a commitment to exceed these within the confines in existing strategies and subject to resources being available. • It must be made clear that the administrative boundaries of the Metropolitan Authorities and the Metropolitan MUA are not contiguous. • Ex MUA (both SSD/and non-SSD) requirements need to remain maxima (as in the case in adopted RSS). In the light of changing circumstances (economic downturn / lower building rates / back loading of delivery) this is even more apparent in order to support Urban Renaissance.
CF4: Phasing of New Development	<ul style="list-style-type: none"> • Principle supported as it seeks early delivery of Urban Renaissance. • Any fundamental changes to the level and distribution of housing may adversely affect the ability to prioritise early delivery of the Urban Renaissance. • Phasing schedule needs to be reprofiled in the light of delivery currently being below trajectory and changing circumstances (economic downturn / lower building rates / back loading of delivery). This needs to continue to reflect the MUA/ex MUA rates of delivery to ensure accelerated delivery of the Urban Renaissance. • When the market recovers there will inevitably be speculative pressures to release easier to develop sites out of the MUAs to act as a market stimulus – excessive and untimely release of ex MUA land will be potentially fatal to the Urban Renaissance. • A more robust phasing approach that can be monitored and implemented is essential if early delivery of the Urban Renaissance is to be delivered. • A clear signal that public resources are required to prioritise delivery of the Urban Renaissance is necessary.
CF5: Reuse of land and buildings for housing	<ul style="list-style-type: none"> • Principle supported as this is consistent with Urban Renaissance principles.

	<ul style="list-style-type: none"> Any fundamental changes to the level and distribution of housing may adversely affect the ability to accelerate delivery of the Urban Renaissance and meet the specified targets. Achievement will be compromised, however, unless amendments shown in relation to CF1 – 4, particularly in relation to phasing, are not taken on board.
CF7: Delivering Affordable Housing	<ul style="list-style-type: none"> Support guidance but needs to acknowledge that further work required as Housing Market area and LDF boundaries are not contiguous. Make it clear that increasing overall land supply does not necessarily lead to increased affordability, either across the board or in the most appropriate locations. Demand side factors and direct funding to provide social housing are also important factors. Ensure that national policy is not reiterated.
CF9; Delivering Mixed Communities	<ul style="list-style-type: none"> Support as it gives scope for local authorities to steer the market towards providing dwelling types to support the Urban Renaissance. Ensure that national policy is not reiterated
CF10: Managing Housing Supply	<ul style="list-style-type: none"> Strongly support recognising contribution of windfalls in MUAs as unidentified small sites yield significant capacity. Ensure that national policy is not reiterated.
Prosperity for All	
PA1: Prosperity for All	<ul style="list-style-type: none"> Support amendment which identifies MUAs as primary focus for employment development.
PA6A: Employment Land Provision	<ul style="list-style-type: none"> Support approach which gives guidance on employment land requirements. It is imperative that these guard against historically high levels of employment land allocations outside of the MUA Make it clear that any changes in housing distribution / levels will necessitate amendment of this policy and may put employment land under undue pressure in certain locations potentially leading to unsustainable development patterns. Clarify that RIS / MIS requirements are additional to these.
Policy PA9: Regional Logistics Sites	<ul style="list-style-type: none"> Support policy amendments particularly identification of need for provision to serve Black Country (in southern Staffordshire)
PA11: Network of Town and City Centres	<ul style="list-style-type: none"> Support but seek clarification of the hierarchy's role / purpose.

<p>PA12A Comparison Retail Floorspace Requirements 2006 - 26</p>	<ul style="list-style-type: none"> • Agree these in principle and the underpinning approach. • Request support that any deviation from these requirements needs to be thoroughly justified (para 7.68). This crucial point is more appropriate as policy rather than text. • Draw attention to the fact that the figures will need to change if population within catchment areas changes significantly. • In the light of the above, draw attention to the fact there could be pressure for out of centre development if growth takes place in the catchment area of a centre with capacity constraints and that this would be contrary to PA11.
<p>PA13A: Office Development Requirements</p>	<ul style="list-style-type: none"> • Support focus on strategic centres as primary office locations but seek clarification of the hierarchy's role / purpose (as per PA11). • Draw attention to the fact that redistribution of population could lead to over / undersupply of offices in certain locations. In the former case this could lead to additional pressures for out of centre development. • Seek clarification as to how the 65%:35% in centre / out of centre split will be implemented / monitored. • Delivery of speculative development, especially in the short / medium term, may be an issue in the light of changed economic circumstances. • However, in order to support the Urban Renaissance objectives overprovision should not be made outside of MUAs; provision should be MUA minima: ex MUA maxima to reflect this. Any deviation from this needs to be justified. This should be reflected in the policy rather than as text.
<p>PA13B: Large scale office development outside of strategic centres</p>	<ul style="list-style-type: none"> • Support additional guidance • Support the policy to limit B1a office development on general employment allocations. • Seek further clarification to distinguish between provision for offices in non strategic centres and out of centre locations, and also clarify the position regarding office uses on RIS.
<p>Waste</p>	
<p>W1: Waste Strategy</p>	<ul style="list-style-type: none"> • Generally agree with the "equivalent self sufficiency" concept (i.e. the general principle that each area should make provision for managing a tonnage of waste equivalent to its arisings) • Ensure that national policy is not unnecessarily duplicated.

W2: Targets for Waste Management	<ul style="list-style-type: none"> As is apparent with other policy areas, any large scale changes to the level and distribution of housing requirements may lead to a need to review the figures.
W3: The Need for Waste Management Facilities	<ul style="list-style-type: none"> Agree in principle as identifying treatment gaps is consistent with the overall principles set out in Policy W1. The distinction between meeting local needs and or regional / sub regional requirements is unclear both in terms of Policy W3 and the overall strategy as expressed in Policy W1 and this warrants clarification.
W4: Protection of Existing Waste Management Facilities	<ul style="list-style-type: none"> Support approach in principle.
W6: Sites Outside the Major Urban Areas and Other Large Settlements	<ul style="list-style-type: none"> Green Belt within Metropolitan Authorities boundaries is largely ex MUA. The policy needs to be clarified to reflect this to ensure that such locations are not deemed suitable by default.
W7: Waste Management Facilities and Open Land	<ul style="list-style-type: none"> Support criteria in principle although ensure that no duplication of national policy.
W8: Hazardous Waste – Safeguarding Sites	<ul style="list-style-type: none"> Issue implicitly covered by policy W4. Unnecessary duplication.
W9: Construction and Demolition Waste	<ul style="list-style-type: none"> Agree with the sentiments of the policy with provision likely to be forthcoming in certain employment areas. Policy needs reconciliation with SR3 Sustainable Design and Construction. Further definition of ‘urban quarries’ would be beneficial.
W10: Sites for Contaminated Soils	<ul style="list-style-type: none"> Subsequent work undertaken in connection with the Black Country Joint Core Strategy has questioned the commercial viability and appropriateness of identifying specific sites and has identified alternative approaches.
W11: New Sites for Landfill	<ul style="list-style-type: none"> Policy supported.
W12: Hazardous Waste – Final Disposal Sites	<ul style="list-style-type: none"> See comments relating to W6.
Transport	
T6: Strategic Park and Ride.	<ul style="list-style-type: none"> Support policy but implementation needs to be accelerated. There is further evidence to justify inclusion of further locations Castle Bromwich, Redditch, Tamworth, and Kidderminster.
T7: Car parking standards and management	<ul style="list-style-type: none"> The West Midlands LTP provides the broad parking policy context for the Metropolitan Area. The criteria in this policy are supported as a basis for considering a sub-regional approach to parking standards to be progressed through Local Development Frameworks.

	<ul style="list-style-type: none"> • The policy needs to make reference to the need for parking standards to be set to support Urban Renaissance principles. Ex MUA parking provision must not be at a level that would: <ul style="list-style-type: none"> ○ Act as a disincentive to investment in MUAs. ○ Encourage development that encourages a large number of trips in unsustainable locations.
T8: Demand Management	<ul style="list-style-type: none"> • Seek revision to the policy in the light of work undertaken under the auspices of the Transport Innovation Fund (TIF). • In the Metropolitan Area it was agreed that road pricing is not appropriate at this time. However, subject to technological advances the position may be reviewed towards the latter part of the RSS period.
T10: Freight	<ul style="list-style-type: none"> • Update to refer to publication of Regional Freight Strategy.
T11: Airports	<ul style="list-style-type: none"> • Generally the policy is supported subject to amendments to update regarding the current position at Coventry Airport.
T12: Priorities for Investment	<ul style="list-style-type: none"> • The schedule provides a useful largely thematic context for the progression of more specific schemes through the Regional Funding Advice process although some very large freestanding schemes are identified. • The following factual updates need to be reflected since submission: <ul style="list-style-type: none"> ○ The schedule needs to be updated to include references to Black Country sub-regional priorities as published in the Phase One Revision published in January 2008. ○ References to TIF as a funding mechanism for Metropolitan Sub-Regional schemes need to be removed. ○ Private sector funding will be sought towards further Metro extensions in Birmingham and the Black Country (this appears to be an omission) ○ In the light of the recent appeal decision, Brinsford Park and Ride, private sector funding is not identified at present.

<p>1</p>	<p>There is scope to identify additional land for housing in the region - <i>In considering the impacts and delivery risks of additional housing (beyond that identified in the RSS Phase2 Revision) the evidence suggests that:</i></p> <ul style="list-style-type: none"> - <i>additional land can be identified but its development will inevitably lead to localised impacts;</i> - <i>in appraising and balancing those impacts it will be important to consider the less visible impacts of failing to identify sufficient land to meet need and demand.</i>
	<p>Whilst it is physically possible to identify additional land the top down approach employed by the study does not address localised impacts and policy designations which could be significant barriers to implementation. Spatially specific proposals, albeit in a general form, must not be imposed and will impede the delivery of Core Strategies currently in progress.</p> <p>Furthermore, whilst impacts may only be most visible locally, their cumulative effects could be strategic in terms of undermining Urban Renaissance objectives. Moreover, environmental considerations are not fully addressed; for example, the implications for meeting carbon reduction commitments as set out in the Climate Change Bill.</p> <p>The study appears to conclude that additional housing allocations will be neutral, both in terms of the delivery of RSS Phase Two allocations and in terms of impacts on existing areas, which will continue to form the vast majority of the dwelling stock.</p> <p>Local authorities clearly support meeting recognised housing needs. The NHPAU analysis and Household projections are useful guides, but being trend based, are not definitive indicators of need and do not take account of policy considerations. Moreover, in the current economic climate there is a danger that households may not form in accordance with the assumptions made when undertaking the projections.</p> <p>PPS3 Housing (2006) suggests that other factors need to be taken into account such as local and sub-regional evidence of demand. Such ‘need’ based considerations must be considered as oversupply in inappropriate locations may lead to displacement and ‘hollowing out’ of parts of the MUA which is counter to the Urban Renaissance strategy.</p> <p>Indeed, the NLP study concedes at the outset that:</p> <p style="padding-left: 40px;"><i>‘The study does not set out to establish the level of housing need and demand in region or to test the appropriateness of the NHPAU’s supply range as a possible measure of the housing requirement for the region. Rather it seeks to explore whether it is possible to increase housing provision over the Preferred Option in the light of the NHPAU supply range’ (Vol 1 para 1.11).</i></p>
<p>2</p>	<p>Additional housing need not harm achievement of Urban Renaissance – <i>A key concern and contention of many consultees and stakeholders is that additional housing would necessarily mean more Greenfield development outside the MUAs and that this would inevitably harm urban renaissance by causing developers to “cherry pick” sites outside MUAs and displacement of housing demand away from MUAs and leading to local housing-led out-migration from the MUAs. The study found no clear definition of urban renaissance, and no clear evidence to support the view that the level of non-MUA housing in the Phase 2 Revision represents a maximum level, beyond which harm to urban renaissance occurs;</i></p>
	<p>The Urban Renaissance is an integrated concept and the RSS Annual Monitoring Report considers a basket of indicators to measure progress towards it. Whilst the amount and quality of housing in the MUA is not the only determinant, it is clearly a fundamental one, and it is illogical to suggest that increasing housing supply outside of the MUAs relative to that within it will not lead to out migration.</p> <p>The argument that developers do not cherry pick sites is weak (developers bring forward sites that are available / viable regardless of location) and appears to be based on anecdotal responses from the development industry. Elsewhere the study appears to contradict this by suggesting that developers favour Greenfield sites.</p>

3	<p><i>There is no evidence that increased housing supply outside the Major Urban Areas (MUAs) will reduce housing supply within them</i> – Housing output in the MUAs has increased since 2001 and this growth correlates strongly with the growth in the number of 1 and 2 bed urban apartments developed in that period. In contrast the MUA housing growth has a negligible correlation with a reduction of new housing outside the MUAs. Developer feedback supported the statistical findings. They considered that the apartment market had driven higher housing output in the MUAs but this market is now saturated. In their view restricting land supply outside the MUAs will not rekindle the urban apartment market nor trigger development on other MUA sites. Rather it will simply serve to restrict new housing starts overall;</p>
	<p>It is acknowledged that apartments have led to increases in housing output in MUAs and the apartment ‘boom’ was largely driven by the market and Government policy. Metropolitan Authorities are consciously aware that they need a range and mix of dwelling types to meet Urban Renaissance objectives and there is a concern that excessive land supply beyond their boundaries may undermine their ability to do so.</p> <p>This assertion (again drawn from anecdotal advice from the development industry) does not take account of the fact that the 2004 RSS is in its early stages and that high historic levels of ex MUA consents will have been built out since 2001, especially given the strong market conditions. An analysis of more recent commitments made under the provisions of the adopted RSS may lead to a different conclusion being drawn.</p>
4	<p><i>There is no evidence that increasing housing supply outside the MUA causes out migration</i> – The study found that the spatial relationship between migration patterns and land supply in the region is complex. No clear evidence was found to support the assertion that additional non-MUA housing will inevitably increase out-migration from the MUA. Rather, the availability of new housing is one of a range of factors which influence household location decisions, the most important being employment location; environmental quality; transport accessibility; quality of life / place (services / facilities / amenities); quality of education;</p>
	<p>Indeed the level of housing is not the only factor governing out-migration and as mentioned previously, the Urban Renaissance is an integrated concept based of which the availability of housing is only one, (albeit a key) factor (See response to 2 also)</p> <p>The study is weak in its analysis of the implications of excessive supply outside of the MUAs on established MUA settlements and how this may lead to the ‘hollowing out’ that the adopted RSS is seeking to stem.</p>
5	<p><i>There may be limits on how far it is possible to increase housing supply within the MUAs</i> – There are major delivery risks in allocating further housing land in the MUAs. Those areas are already failing to deliver the rates of housing in the Phase 2 Revision – undershooting by 17,500 units in the period 2001/2 to 2006/7. Developer feedback indicated that the recent reduction in build rates caused by the credit crunch is impacting most in the MUA apartment sector of the market. The study concludes that a policy response to those reduced rates which involves more allocations in the MUAs carries very high levels of delivery risk</p>
	<p>It is illogical to compare RSS Phase Two housing requirements with previous delivery rates when the targets set in the adopted 2004 RSS were significantly lower.</p> <p>Capacity has been identified to accommodate RSS Phase Two Revision housing levels as minima within the Metropolitan Area, with evidence that there is potentially scope to exceed this in certain areas. In order to accelerate delivery of this capacity, which is widely acknowledged to be consistent with the principles of sustainable development, it is imperative that public resources are directed so as to bring it forward.</p>
6	<p><i>In some locations there are increased risks that additional supply in contiguous areas could harm fragile markets and undermine housing market renewal, but this may be able to be overcome by careful phasing</i> – The relationship between the amount and location of new housing and the effects on fragile housing markets in the region is complex. There is a need to distinguish between a) areas of lower demand due to economic weakness and lower household growth; and b) areas of market dysfunction where the housing mix and quality of place does not match housing aspirations.</p> <p><i>In the areas with lower demand, such as North Staffordshire, there is a need to phase additional housing carefully to avoid local displacement effects which might impact on regeneration initiatives. In Birmingham and the Black Country new housing could, subject to market capacity, play an important role in addressing market dysfunction by helping deliver positive place change and providing housing which better reflects demand. Distributing additional housing to support regeneration brings into focus a number of potential tensions and risks. Good quality new housing can be enormously influential in delivering positive place change.</i></p>

	<p><i>However if that additional housing is not successful in attracting additional households to the area it can cause market weakness or vacancies in adjacent areas of poorer quality housing. Whilst careful phasing and integration with wider investment can mitigate these risks, it is clear that options which propose significantly higher levels of housing into fragile market areas could potentially undermine current housing regeneration investment;</i></p>
	<p>In order to deliver the Urban Renaissance, Metropolitan Authorities are seeking to provide housing of a type and quality in order to meet peoples' aspirations.</p> <p>This conclusion appears to suggest that excessive supply within weak localised housing markets could lead to intra housing market displacement and increases in vacancies. It appears, however, to discount inter housing market displacement and increased vacancies if additional growth is directed to more economically buoyant locations.</p>
7	<p><i>The precise relationship between housing supply, economic growth and regeneration is not simple but additional housing supply could help relieve labour supply blockages in important growth sectors</i> – <i>In parts of the region, notably some rural areas and the south-east quadrant, housing output is not keeping pace with job growth. There is also evidence of increasingly footloose patterns of economic and housing investment influenced by factors such as quality of life and place. Whilst the precise relationship between jobs and housing is complex the appraisal of options pointed clearly to additional housing in the south-east quadrant as a means of better matching employment and housing growth thereby better enabling new housing to support the growth of important economic growth sectors in that area;</i></p>
	<p>The reverse of this argument is that there are urban areas where there is a shortage of high quality jobs; therefore should we not be seeking to direct employment investment to where there is a labour supply? To keep planning for housing growth in the south east of the region is likely to lead to the further 'hollowing out' of parts of the MUA, leading to further social polarisation.</p> <p>This conclusion does not consider the role of Regeneration Zones (which cover large parts of the MUAs); these policy tools seek to direct public and private resources to these areas of need in order to encourage economic investment in support of the Urban Renaissance strategy.</p> <p>The RSS strategy is regeneration and growth led rather than just seeking to maximise GVA. This is a narrow measure of economic wellbeing which does not take account of the likes of social costs, lost output and transfer payments.</p> <p>Moreover, by focusing development activity in the south east quadrant, there may be a risk that that it will encourage further out migration from the south east region. There does not appear to be any analysis of this in the study.</p>
8	<p><i>Birmingham needs more good quality housing in its hinterland to grow its global role</i> – <i>Birmingham's role as the regional economic hub and as a global city is recognised. To help it fulfil these roles it needs a close and linked relationship to vibrant housing markets in its hinterland. Restricting housing supply in locations which are outside the MUA but clearly fall within its housing market will serve to harm the ability of Birmingham to grow its global role;</i></p>
	<p>The evidence base for this conclusion is unclear. There is a need to increase the supply of high quality housing within Birmingham and other parts of the Metropolitan Area in support of the Urban Renaissance.</p>
9	<p><i>Additional housing growth can help address genuine affordability problems and meet housing needs</i> - <i>The study has drawn a number of evidence-based findings in relation to improving accessibility to good quality affordable housing:</i></p> <ul style="list-style-type: none"> <i>– The NHPAU evidence is that increased supply will reduce prices and improve affordability;</i> <i>– the MUAs contain the greatest number of people in need, but the affordability gap is most acute in the shire counties and rural areas;</i> <i>– during the credit-crunch it will be increasingly difficult to secure affordable housing from developers. The challenge will be greatest in the MUAs.</i>

	<p>It is considered that the NHPAU evidence is narrow in that it considers only supply side factors rather than demand side factors such as the availability of mortgage finance. The planning system is also being overburdened in terms of demands on it to deliver 'affordable' housing in the light of limited direct central resources.</p> <p>Whilst the ex MUA 'affordability gap' may be more acute, there is no analysis as to how this has come about. It may be the case that selective out migration of those in higher socio-economic groups has led to price increases, a trend that may be exacerbated if allowed to continue.</p>
10	<p><i>There will be important affordability benefits flowing from increasing allocations in many of the shire counties and rural areas. There are these areas where needs are most acute and where there is the greatest prospect of developers being able to afford higher levels of affordable housing provision;</i></p>
	<p>Increasing the supply of housing in such locations is supported provided that it is in accordance with identified needs and does not undermine overall Urban Renaissance policy objectives by encouraging excessive out migration.</p>
11	<p><i>Additional housing growth is likely to require the release of Green Belt but this is consistent with RSS objectives if it results in sustainable development and regeneration - RSS already recognises the principle of Green Belt releases being necessary to meet housing needs. The scenarios for accommodating additional housing growth, as developed through this study, identify the broad locations where these green belt reviews may be required. It will be for Core Strategies to consider the specific boundary changes where such releases might be in the context of:</i></p> <ul style="list-style-type: none"> <i>- urban extensions (in and around the MUAs and SSDs) can provide more sustainable solutions than development "leapfrogging" the Green Belt;</i> <i>- mixed-use urban extensions or new settlements around Birmingham and in the South-East quadrant might offer major benefits in linking new housing to existing and future economic growth;</i> <i>- there may be scope for Green Belt extensions to provide better protection of openness around settlements such as Warwick and Stratford.</i>
	<p>The RSS Phase Two Revision does not propose a fundamental review of Green Belt boundaries as this would be counter to the Urban Renaissance policy objectives. Government policy as expressed in PPS2 Green Belts, also states that one of the roles of Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The Phase Two Revision does, however, give flexibility for boundary amendments to deliver local strategies; these should be taken forward through LDFs and these are referred to as appropriate.</p>
12	<p><i>New settlements are a potential form of development that could meet requirements, in the right locations and if the delivery capability is in place - The scope for identifying and developing new settlements in the region should be considered. It is considered that the south-east of the region offers the best opportunity. The analysis concluded potential new settlements could be either:</i></p> <ul style="list-style-type: none"> <i>- smaller settlements (under 10,000 units) perhaps linked to existing settlements and private sector led; and/or</i> <i>- larger free standing settlements of circa 20,000 units or more which would require major public sector delivery capacity and leadership given their complexity and profile.</i>
	<p>Recent representations made by WMRA on the Eco Town proposals put forward conclude that they are contrary to the underlying RSS principles. Any further proposals coming forward must unequivocally demonstrate that they are not detrimental to the Urban Renaissance.</p>
13	<p><i>Transportation issues are not a fundamental barrier to delivering more housing although investment will be needed - In terms of journey times and delays none of the nine options incur impacts markedly different from the Phase 2 Revision. At a local level there will be a need to mitigate impacts caused by significant amounts of new housing. None of the nine options appear to result in mitigation requirements which are technically not possible. Any infrastructure improvement to facilitate housing growth, which is not already a funding commitment, carries delivery risks. A key task will be to align the</i></p>

	<p><i>phasing of additional housing with the funding and timing of new infrastructure. Developments of 5,000 units and above, in a particular location, may offer greatest prospect of securing private sector funding of major infrastructure improvements;</i></p>
	<p>The evidence underpinning this is limited and appears to be based largely on a strategic level Highways Agency study which it is understood considers implications for the network as a whole. Clearly there is the technical capability to overcome most concerns but resources are finite and there may be unpalatable environmental consequences particularly given the Government's commitment to reducing carbon emissions.</p> <p>The apparent abdication of infrastructure planning to the LDF process without consideration of delivery, impacts and funding is a matter of real concern.</p> <p>Analysis of public transport is weak, other than cursory mention of rail capacity, with the implications not being discussed further. There is a concern that the scenarios put forward will lead to increased car dependency which again is counter to policy at all levels.</p>
14	<p>Although there are localised hydrology issues to resolve, there is no evidence that these cannot be addressed through investment in additional capacity or consideration of specific locations in Core Strategies - There is no evidence that the hydrology impacts and mitigation associated with higher housing growth are markedly different than those required to deliver the Phase 2 Revision level of housing. There is no evidence that hydrology impacts cannot be mitigated or that feasible technical solutions cannot be found. Flood risk measures water supply improvements and water treatment works will require careful timing and advance planning to help manage risks;</p>
	<p>The evidence in support of this conclusion is limited. The report states that: 'The issue of obtaining sufficient and timely funding bids through OFWAT has been raised by Severn Trent as a potential constraint to delivering growth' (Vo I3, para 9.23)</p>
15	<p><i>The market downturn means the currently envisaged trajectory of housing will change but there is no fundamental market barrier to increasing supply provided there is sufficient suitable and available land</i> - There was clear and consistent feedback that the current market downturn will reduce envisaged housing output to 2011. Much higher RSS requirements will therefore be required later to enable housing output to "catch-up" with pent-up household growth and affordability issues. The study concludes that:</p> <p>– Build rates in the second half of the RSS period may need to rise to around 25-28,000 per annum by 2018/9. This compares to recent rates of 13-16,000 per annum;</p> <p>– Both the study research and developer feedback indicates that this scale of increase should be feasible provided that:</p> <ul style="list-style-type: none"> • sufficient deliverable land is made available; • the allocations are spread around the region rather than overloading particular markets; and • Wider issues such as skills are properly resolved. <p><i>it is clear that the upper end of the NHPAU range, namely 442,000 additional houses by 2026, represents a considerable challenge.</i></p>
	<p>The Study analyses the impact of the current downturn in the economy (see graph at Appendix 3), suggesting that lower completions in the first five years would be counterbalanced by rising completions in later years. This graph underlines the fact that decisions on increasing overall housing numbers are not urgent and that the NLP options - which rely on high levels of Greenfield development – present a very real threat to the Spatial Strategy.</p> <p>There is a concern that when the market shows signs of recovery (regardless of the overall level of housing proposed), there will be speculative pressures for the release of additional sites outside of the MUAs in order to provide an early market stimulus and that this could undermine delivery of the Urban Renaissance strategy.</p> <p>Inevitably housing delivery will need to be back-loaded towards the latter part of the RSS period. This will require delivery at unprecedented levels and it is not clear whether the construction industry will have the capacity to deliver at these enhanced rates.</p>

16	<p><i>The phased release of land needs to focus on managing the risks for fragile markets, whilst also ensuring that supply increases as quickly as possible out of the downturn - Housing delivery in the region will need to accelerate rapidly out of the downturn to catch up to the RSS Revision 2 levels, let alone the NHPAU ranges. Whilst there will be a need to ensure land is released to reflect the policy emphasis on Brownfield land the delivery challenge will necessitate an ongoing supply of both Brownfield and Greenfield land sufficient to give confidence that higher rates of development can be achieved. In the more fragile market areas of the region there will be a need to ensure the phasing of new housing is aligned with supporting regeneration and infrastructure investment in order to minimise risks of displacement.</i></p>
	<p>See responses to conclusions 15 and 6 also.</p> <p>Whilst the conclusion relating to localised fragile markets is acknowledged, it is not understood why it is not applied more universally as elsewhere the report suggests that that there is no strong evidence of displacement between MUA and ex MUA areas whilst suggesting that ex MUA housing markets are stronger.</p>

Coventry/Solihull/Warwickshire Forum –November 28th 2008

Response to the WMRSS Phase Two revision draft Preferred Option 2007 and the Nathaniel Lichfield and Partners Study

That the Forum:

- (1) Endorses support for the RSS Phase Two Preferred Option and welcomes the adoption of Forum Strategy but asks that this be embodied in Policy
- (2) Endorses the opposition to the approach and conclusions of the NLP study and of new settlements as an approach to provision

1 Background

Background

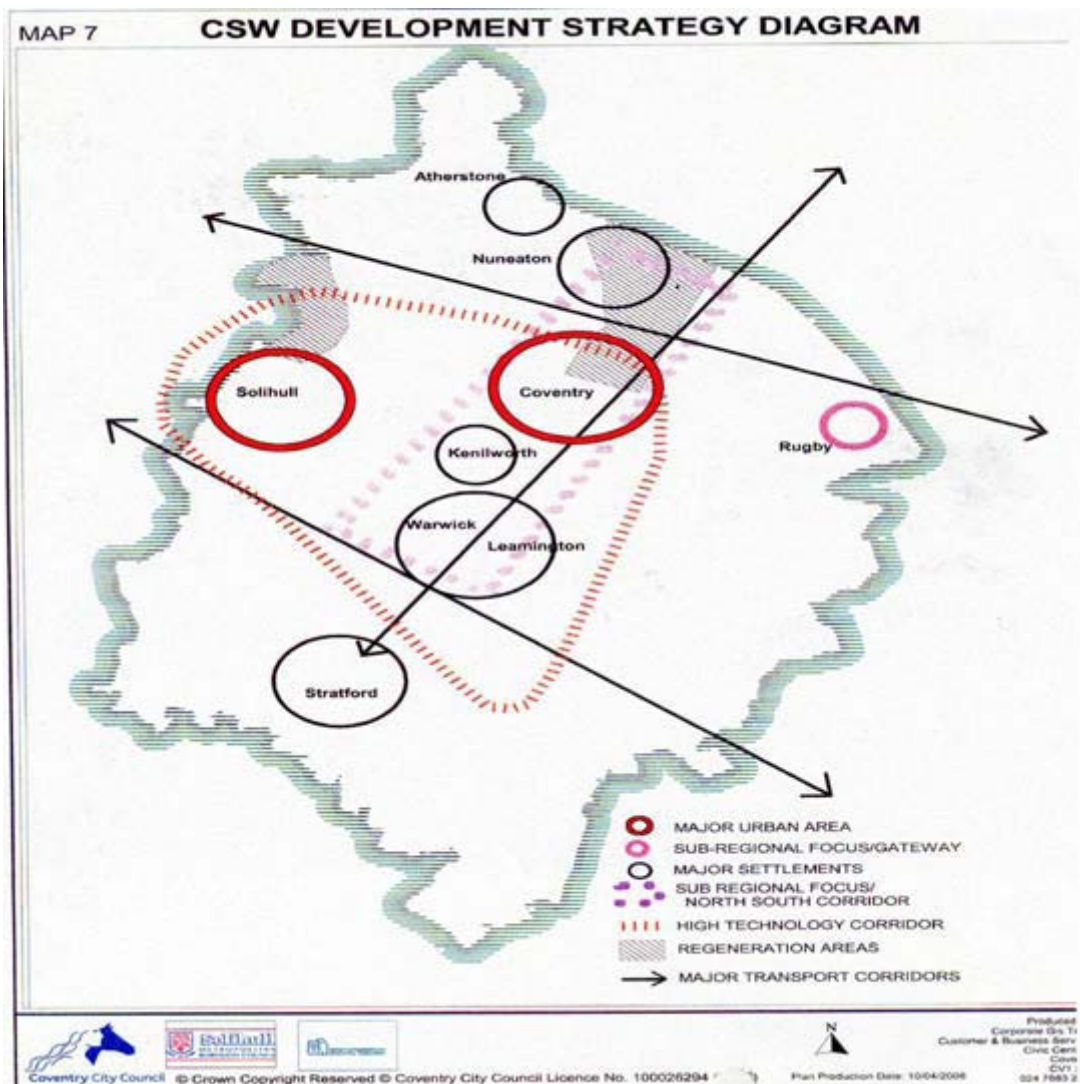
- 1.1 The 2004 Planning Act gave statutory status to Regional plans and redefined the Development Plan to incorporate both the strategic elements of the Regional Plan (RSS) and more local issues which will be determined via the Local Development Framework. Plans prepared by the local planning authorities are required to be in accordance with the RSS.
- 1.2 The Regional plan for the West Midlands was approved in 2004 but in approving the plan the Government required reviews of some aspects of the spatial strategy. Phase One related to the Black Country [now complete] and Phase Two is presently covering the following issues: -
 - Housing
 - Employment
 - Strategic Centres
 - Offices
 - Regional Casinos
 - Waste
 - Transport and Accessibility
- 1.4 Phase Three began in November 2007 and will cover rural services, gypsy and traveller sites, culture, minerals and the environment.
- 1.3 The 2004 RSS is underpinned by two principles:
 - **Urban Renaissance** – developing Major Urban Areas (being Birmingham, Solihull, Black Country, Coventry and the North Staffordshire conurbation) in such a way that they can increasingly cater for their own economic and

- social needs– countering the unsustainable outward movement of people and jobs;
- **Rural Renaissance** – meeting the economic and social needs of rural communities whilst enhancing the unique qualities of our towns and villages and the surrounding countryside.

- 1.5** The phase Two Review Preferred Options was submitted to GOWM in December 07. However almost immediately the Government responded indicating that it did not believe that sufficient provision was planned for housing to meet the needs of the subregion up to 2026. It therefore indicated that consultants would be appointed to consider further how additional provision could be made. Nathaniel Litchfield and Partners (NLP) were appointed to undertake this study and their final report was published in October 2007. Comments in respect of the submitted Preferred Options and on the NLP study are required to be submitted by 8 December 2008 and will be considered at the Examination in Public that commences in April 2009.
- 1.6 This report therefore considers and advises on the approach that should be adopted by the Forum and considers firstly the Preferred Option and then the NLP study.

The Forums input into the Phase II Review Preferred Options

- 1.6** At the start of the review process in May 2006 the CSW Forum agreed a Development Strat The Forum's submission indicated that Coventry should be the focus of growth within the sub-region and at the core of the North/South growth corridor. It also recognised that there may need to be:
- the release of some green belt land close to the core development area (North/South growth corridor);
 - Balanced provisions of housing and employment;
 - Support for the defined centres within the sub-region
 - Significant upgrading of public and other transport networks



1.5 Building on this in July 2007 the forum endorsed that the RSS:

- **Adopts** the main elements of the CSW Strategy and endorses the CSW Sub-region for the purposes of RSS proposals & policies.
- **Provides** for estimated housing demand generated by CSW to be met in the Sub-region – so long as it is robust and can be met within the CSW Strategy.
- **Maintains** the RSS 'step-change' in the Sub-region i.e. **50% (min) growth to Coventry & Solihull; growth focussed on North/South Corridor & Rugby; supporting infrastructure; growth in N. Warks & Stratford limited to local needs.**
- **Phases** housing land releases to encourage regeneration in the MUAs by giving priority to:
 1. sustainable locations first & foremost and,
 2. within those locations, brownfield land before greenfield land;
 3. then, if necessary, urban extensions within-LAs areas; and

4. only as a last resort, cross-boundary urban extensions in the N-S Corridor – later in the plan period - if no more suitable alternative capacity is available.

- **Enables** specific local Green Belt boundary adjustment for urban extensions to be made through LDFs - when & where essential to meet long term needs.
- **Proposes** that releases of land for housing are geared to maintain a constant average annual supply across the Sub-region.
- **Excludes** the provision of land in the Sub-region to meet any ‘overspill’ housing needs arising from elsewhere e.g. Birmingham, Redditch, Tamworth.
- **Includes** flexibility allowing for different ways of securing the RSS’s ‘step change’ that reflect sensitivity to local circumstances.

The Phase II preferred Option

- 1.6 As stated above the Preferred Option was submitted by the WMRA in December 2007. The submitted RSS Phase II draft "the Preferred Option" includes a new chapter that describes the strategies for the varies parts of the region. This is appended to this report and it can be seen that it very closely reflects your strategy. However text is of less weight than formal policies and it is recommended that you make representations to embody this into a specific sub-regional policy that will then underpin interpretation of all other policies. {Dave cant remember what you said on Solihull separate comments – if you want them in can you get cut and pasted please}
- 1.7 The Preferred Option provides policy and direction in respect of a number of matters and Appendix 2 provides a brief description of the policies.
- 1.8 The "Preferred Option" is based on the ONS 2004 population projections and provides for 365,000 additional dwellings across the region up to 2026. For the sub region(when errors were adjusted), this forecast a requirement to accommodate an additional 81,000 households. As a paper to the CSW Forum noted in July 2007 if distributed according to past trends the distribution would be:

Area (LAs)	Demand 2006-26 hhds net	(%)
Coventry	12,300	15%
Solihull	9,840	12%
N. Warks	3,280	4%
Nuneaton	6,560	8%
Rugby	9,020	11%
Stratford	14,760	18%
Warwick	26,240	32%

County	59,860	73%
CSW	100%	

However this distribution would not be consistent with the step change that the application of RSS policies had started to achieve. Regeneration was starting to take place in Coventry and Nuneaton whilst a moratorium was in place in Warwick that was holding back housing growth. Growth was therefore distributed between the MUA's and the county districts on a 50:50 split. Monitoring of the existing RSS provides clear evidence of the success of the 'step change' strategy. For example, in 2006/07 the majority of MUAs achieved housing completions in excess of the minima targets set in RSS and across the region as a whole 47% of total completions occurred within the MUAs. There are also signs that whilst migration from the MUAs continues the level of out migration is reducing. The distribution proposed and embodied within Policy CF3 is:

Area (LAs)	Advised Supply dwgs net (%)	Demand 2006-26 hhds net (%)	Redistribution
Coventry	33,500 41%	12,300 15%	+26%
Solihull	7,600 9%	9,840 12%	- 3%
	41,100 50%	22,140 27%	
N. Warks	3,000 4%	3,280 4%	-
Nuneaton	10,800 12%	6,560 8%	+4%
Rugby	10,800 13%	9,020 11%	+2%
Stratford	5,600 7%	14,760 18%	- 11%
Warwick	10,800 14%	26,240 32%	-18%
County	40,900 50%	59,860 73%	
CSW	82,000 100%	100%	

1.7 The strategy [and the numbers] as an approach has been substantially adopted in this RSS Phase Two Revision Draft - Preferred Strategy recognising that to support urban renaissance market demand must be manipulated if a more sustainable sub region with a focus on urban regeneration is to be achieved. Consequently the distribution of allocations focus new development in and adjacent to existing urban areas as the most sustainable locations and consequentially allocations in places like Stratford and Warwick must be

controlled. However it was recognised in earmarking 33,500 dwellings to Coventry that it was unlikely that these would be capable of being accommodated in the boundaries of the city and it was explicitly indicated that cross boundary urban extensions may be required involving green belt release and that joint studies should be commissioned.

1.8 The Forum strategy has always looked to promote sustainable development and a balance between housing growth and employment opportunities. In this respect PA policies look to protect existing employment sites and to require a continuous 5 year supply of employment to meet the growth anticipated within the region. It also recognises Ansty as an existing Regional Investment site and recognises the need for further provision in the North of Coventry Regeneration zone. In respect of Logistics it earmarks substantial areas in North Warwickshire for major warehousing [dot feel free please]

1.8 In summary it is considered that the submitted Preferred Strategy provides a clear strategic thrust to the development of the sub region wholly consistent with your strategy and that thus officers should be instructed to strongly support its adoption as a sound basis for preparation of Core Strategies.

The NLP Study

1.9 Almost as soon as the Preferred Strategy was submitted Baroness Andrews indicated that the government was commissioning further work to identify greater capacity for house building and eventually NLP were commissioned. Their study is intended as evidence for GOWM and other parties to the EIP into the Preferred Strategy.

1.10 NLP's final report presents three potential growth scenarios for the region as a whole, which total between 417,100 and 445,600 additional housing units up to 2026. These represent between 51,500 and 80,000 more units than the 365,000 proposed in the Phase 2 Revision. The study seeks to explore whether it is possible to increase housing provision over the Phase 2 Revision in the light of the suggested supply range published by the National Housing and Planning Advice Unit (NHPAU) in June 2008.

1.11 The scenarios are

<p><u>1 South-east focus</u> 51 000 extra units</p>	<ul style="list-style-type: none"> ▪ Growth focussed in SE of region (with new settlement in Solihull) and rural west ▪ Seen as focussing provision on the parts of the region with the greatest levels of unmet need and where economic growth is potentially hampered by a lack of housing
<p><u>2 Spreading growth</u> 54 000 extra units</p>	<ul style="list-style-type: none"> ▪ As above (but with smaller scale growth for Solihull and Warwickshire), with additional growth in N Staffs and Telford ▪ Seen as adding areas where there is additional capacity for development and scope to support

	affordability, economic and regeneration objectives
<u>3 Maximising growth</u> 80 000 extra units	<ul style="list-style-type: none"> ▪ Further growth to above and parts of Staffs ▪ Seen as needing sufficient developable land to be released and as a risk given the level of build rate required

1.12 The main messages of the NLP study are:

- there is potential to increase housing land supply beyond the Phase 2 Revision. This may have adverse impacts, but so might a failure to provide sufficient land.
- the increase in housing supply in the MUAs in recent years has not been as a result of restricting supply elsewhere. They point to the recent emphasis on apartments as being a lesson that restricting supply may limit the opportunities for providing a range of housing and also quote the views of developers that market values and development costs are the key.
- there is not a strong statistical relationship between building rates outside the MUAs and net-migration from the MUAs, adding that the relationship between migration and housing supply is more complex and relates to choices households make on factors such as job accessibility, education and quality of life.
- there are limits on the extent to which MUA housing supply can be increased, because of the challenges associated with existing MUA requirements and the lack of market confidence in some locations.
- increased supply might harm difficult markets or undermine housing renewal because of continuing low demand, because of market failure in locations that don't benefit from economic growth and because high levels of additional growth in the MUAs run the risk of undermining regeneration objectives.
- additional housing can assist economic growth and point to the CSW Corridor as evidence, in that footloose employment is following those with jobs who can exercise choice in the housing market and seek locations with a high quality of life.
- there is a strong argument that Birmingham's housing supply in the Phase 2 Revision underplays its potential role and also assert that restricting housing supply outside MUAs would undermine it.
- that there is evidence that increasing the supply offers an opportunity to dampen down house prices and increase affordability, especially where problems are more acute, such as the shire counties. They assert that additional allocations in rural and suburban areas offer the prospect of delivering more affordable housing in the short- to medium-term.

- additional housing growth is likely to lead to reviews of the Green Belt and state that options involving urban extensions can be more sustainable than "leapfrogging" the Green Belt.
- there is scope for new settlements, either in the form of smaller settlements (under 10 000 units) linked to existing settlements or as larger free-standing settlements (about 20 000 units).
- known investment in transport infrastructure will contribute to addressing congestion and accommodating increased growth. Similarly, whilst there may be localised water and flooding issues, sufficient mitigation can be put in place.
- there are issues associated with the market downturn, but state that increased building rates in the latter part of the plan period can help to deliver the overall supply needed, whilst the phased release of land needs to focus on managing the risks for fragile market

Potential Implications for the sub region of the NLP scenarios

- 1.13 All three of the scenarios target the southern part of the sub region for additional growth on the basis of market preference and economic need. It is clear that NLP have neither understood or applied the CSW strategy. The options appear to follow previous trends and respond to the views of housebuilders on the attractiveness of certain parts of the region. In the sub region the additional increases are focussed on the Districts of Stratford (4500 dwellings), Rugby (3-5,000 dwellings) and Warwick (5-10,000 dwellings), with no additional allocations proposed for Nuneaton and Bedworth or North Warwickshire.
- 1.14 In relation to the MUAs within the sub region, Coventry has no additional allocation at any option level "due to significant increases above both past build rates and CLG projections in the RSS Phase 2 Preferred Option, although stakeholder feedback indicated urban extensions to Coventry preferable to development in adjacent areas." Solihull is targeted in all three scenarios with scenario 1 advocating a new settlement, whilst scenario 2 adds 5000 and scenario 3 - 10,000. Warwick is targeted for an additional 5000 in scenario 1 and 2 and 10,000 in scenario 3. Rugby is targeted for an additional 3000 dwellings in scenario 2 and 5000 in scenarios 1 and 3. There would also be impact on the sub region from proposals in neighbouring authorities particularly to Stratford

Scenario 1 South East +51,000 / 27,500				
Coventry	33,500		Nuneaton & Bedworth	10,800
Solihull	20,600	+13,000	Warwick/Leamington	15,800 + 5,000
			Rugby	15,800 + 5,000
			Stratford	10,100 + 4,500
			North Warwickshire	3,000
Total	54,100		Total	55,500
Scenario 2 Spreading Growth +54,000 / 17500				
Coventry	33,500		Nuneaton & Bedworth	10,800
Solihull	12,600	+5,000	Warwick/Leamington	15,800 +5,000
			Rugby	13,800 +3,000
			Stratford	10,100 +4,500
			North Warwickshire	3,000
Total	46,100		Total	53,500
Scenario 3 Maximising Growth +80,000 / 29,500				
Coventry	33,500		Nuneaton & Bedworth	10,800
Solihull	17,600	+10,000	Warwick/Leamington	20,800 +10,000
			Rugby	15,800 + 5,000
			Stratford	10,100 + 4,500
			North Warwickshire	3,000
Total	51,100		Total	60,500

1.14 Your officers consider that the study :

- is based overtly on trend based analysis and projections which are themselves challengeable and is arithmetically rather than policy driven.
- one dimensional in focusing overtly on supply side factors in its approach to distribution rather than meeting identified needs and does not fully address environmental and social implications
- goes beyond its brief and challenges current strategy and its scenarios undermine the urban regeneration and growth based policies currently supported by the Regional Assembly
- will require delivery at unprecedented levels and it is unclear whether sufficient infrastructure will be in place, raw materials available or whether the development and construction industries will have the capacity to deliver.
- has been prepared in a 'top down' manner and does not fully explore local impacts.

1.15 It is clear that the NLP study is market-led, and that it ignores the sub-regional growth corridor as set out in the CSW (Coventry, Solihull & Warwickshire) Sub-Regional Strategy. This potentially poses a significant threat to regeneration and perpetuates the unsustainable cross commuting that already results from

people working in Coventry and living in Warwickshire. It also in proposing additional allocations for Stratford on the basis of the proposed eco town and a new settlement in Solihull is diametrically opposed to the principles of sustainability that underpins the CSW strategy and distributes growth to a north south corridor from Nuneaton and Bedworth to Leamington/Warwick in urban extensions.

- 1.16 The NLP study does not take account of additional employment land that would be required to service the additional households with jobs. This implies that additional land would have to be allocated (within the Green Belt) for employment development, over and above the amounts set out in RSS 2 Revision.
- 1.17 It is considered that the recent increase in housing supply within the MUA is directly linked to the restriction on housing land supply in the adjoining Shires. The assertion of the report that there is no evidence to suggest that out commuting is not restrained by a restriction on Shire housing supply does not mean that it is not the case. Your officers' practical experience of the region over a significant period of time points to a long history of movement to attractive rural/semi rural shire locations encouraged by high levels of housing construction in such areas. It has been a fundamental principle of the operation of the planning system not only regionally but nationally to guide development for wider public purpose and not simply to facilitate development where the easiest and most attractive development options exist. There has to be recognition of market reality, but to allow that to drive a whole process does not sit well with good planning practice
- 1.18 Clearly market values and development costs are important, that is not in dispute. However, since we operate in a plan-led system, it has to be expected that land values are influenced by Government and other policy to a considerable extent. It follows that by signalling an intention to release a large amount of green field land for development will adversely impact on urban, previously-developed land values, undermining urban renaissance. These are the fundamental principles on which the CSW Strategy are based
- 1.19 Notwithstanding criticism of the distribution of housing, the selection of increases in the numbers of households planned for in the NLP study seems arbitrary and indeed is greater than that emerging from the NHPAU.
- 1.20 The NLP options are considered to be so diametrically opposed to the planned approach towards regeneration of the CSW Forum strategy that they should be dismissed as inappropriate without detailed criticism of the three scenarios.
- 1.21 It is recommended that the Forum maintain their stance that they will plan to meet the needs of the sub region in accordance with the strategy as set out in the submitted Preferred Option. However this must be subject to the recognition of the infrastructure costs and funding being made available to deliver

APPENDIX 1

Coventry.Warwickshire

3.41 Coventry is a compact city that is part of the City Region but also has strong economic and social ties with Warwickshire and Solihull. A Coventry, Solihull and Warwickshire (CSW) Forum advises the eight constituent authorities on the longer term development of the wider sub-region. Coventry has aspirations for growth and has been designated as a New Growth Point. The city recognises the importance of its Regeneration Zone to improving the overall quality of the city and in order to achieve the government's expectations, it will need to consider selective sustainable urban extensions into its surrounding Greenbelt.

3.42 With Coventry at its centre, the sub-region has strong structural and functional relationships running in a corridor from Nuneaton/Bedworth through, Coventry, to Warwick/Leamington. Within this North/South Corridor, there are significant contrasts between the less prosperous areas to the north and wealthier areas to the south.

3.43 The local housing markets in the sub-region, especially in the North-South Corridor, from Nuneaton through Coventry to Warwick/Leamington, are closely interconnected. These interconnections provide strong evidence of the need for a CSW Sub-regional approach to the planning of housing and employment land release, as well as transport investment across the sub-region. However, there is a difference in the characteristics of the housing need between the north and the south, with the former sharing the mixed problems of the Birmingham conurbation to the west and the latter having similar high affordability problems to those experienced in Worcestershire. These differences are reflected in the arrangements for the assessment and targeting of regional funding resources.

3.44 The south of the sub-region is one of the most economically buoyant parts of the Region. The Coventry-Warwickshire area is closest to the Milton Keynes/South Midlands Growth Area, London and the wider South/East Region. This is reflected in strong growth pressures along the M40 corridor and to the south of Coventry where the expansion of Warwick University is acting as a catalyst for growth.

3.45 Given the proximity of these areas of significant economic potential so close to the MUA of Coventry, there is a real opportunity to focus development and realise the growth potential of the sub-region both within the City and also within the wider North-South Corridor. Development will be planned and controlled to ensure that it:

a) maintains the WMRSS 'step-change' in the Coventry, Solihull and Warwickshire area i.e. minimum 50% growth to Coventry and Solihull

b) focuses growth on the North-South Corridor and Rugby; with the necessary supporting infrastructure; but that growth in North Warwickshire and Stratford-on-Avon be limited to local needs

c) phases housing land releases to encourage regeneration in the MUAs by giving priority to:

- ~ sustainable locations first and foremost and, within those locations brownfield land before greenfield land*
- ~ then, if necessary, urban extensions within Local Authority areas*
- ~ only as a last resort, cross-boundary urban extensions in the North-South Corridor (later in the plan period), if no more suitable alternative capacity is available.*
- d) enables specific local Greenbelt boundary adjustment for sustainable urban extensions to be made through LDFs when and where essential to meet long term needs*
- e) proposes releases of land for housing geared to maintain a constant average annual supply across the sub-region.*

3.46 The Coventry, Solihull and Warwickshire area is also crossed by an east/west transport axis from Solihull to the west through Coventry to Rugby in the east. Rugby acts as a 'gateway' with the East Midlands and South East Region and has been designated as a Settlement of Significant Development. However, it is not intended to attract migration from Coventry or the other MUAs and, if the regeneration of Coventry and the north of the Coventry, Solihull and Warwickshire sub-region is not to be undermined, phasing policy will need to control the scale of development on this axis.

3.47 Other than Rugby and the towns of Nuneaton/Bedworth and Warwick/Leamington within the North-South Corridor (i.e. also designated as Settlements of Significant Development), the role of all other settlements within Warwickshire will be to meet the housing and employment needs of the area in the most sustainable way. This will include the provision of affordable housing, especially in those more rural areas of north and south Warwickshire.

3.48 For the Coventry, Solihull and Warwickshire area, the WMES will complement the WMRSS in supporting the urban renaissance of Coventry city centre and the economic vitality of other smaller towns and Nuneaton. The WMES will support the modernisation and diversification of this area through the promotion of key sites for high-value employment purposes and the support for the creative sector in Leamington and Coventry. The WMES will promote the importance of the World Class Stratford initiative, the role of Stratford and the sub regional visitor economy.

APPENDIX 2 – schedule of policies in preferred option

Towards a More Sustainable Region	COMMENTS
<p>SR 1: Climate Change</p> <p>Sets out policies and proposals for local authorities to include in their plans.</p> <p>A Build on strategy to mitigate and adapt to worst impacts of climate change by:</p> <p>Developing and using renewable energy in existing and new developments</p> <p>Reducing need to travel</p> <p>Reducing amount of biodegradable waste going to landfill</p> <p>B Enhance link and extend natural habitats</p> <p>C require all new developments to :</p> <p>Minimimise resource demand and encourage efficient use of resources, especially water, energy and materials</p> <p>Encourage construction climate proof developments and sustainable buildings</p> <p>Avoid development in flood zones protect essential infrastructure against flooding and promote use of sustainable drainage techniques</p> <p>Facilitate walking cycling and public transport</p> <p>Facilitate effective waste management</p> <p>Protect conserve manage and enhance environmental and natural and built heritage assets</p>	
<p>SR 2: Creating Sustainable Communities</p> <p>Sets out policies and proposals for local authorities to include in their plans.</p> <p>A Provide for the planned levels of new housing (in Policy CF2) with sufficient population to achieve a well integrated mix of homes and inclusive communities and to meet peoples needs throughout their lives, including provision of affordable housing</p> <p>B provide for new employment generating activities to meet needs of existing population and any arising from new housing development and to create wealth within the community</p> <p>C create attractive, well designed, adaptable, safe and secure developments with a sense of place responding to distinctive features of site and integrating and respecting local character and maximising the reuse of buildings and brownfield land</p>	

<p>D provide for necessary services and social infrastructure to meet needs of population including health education and skills, spiritual, sport and recreation, cultural facilities and emergency services</p> <p>E provide comprehensive green infrastructure network</p> <p>F provide necessary public transport infrastructure and give priority to the most low carbon forms of transport, such as walking and cycling and reducing need to travel by car</p> <p>G Provide environmental infrastructure needed to support new development</p>	
<p>SR 3: Sustainable Design and Construction Sets out environmental standards for local authorities to consider in plans and in determining applications:</p> <p>Requires sustainability statements accompany major applications that demonstrate at least good standard of West Midlands Sustainability Check list for development are achieved</p> <p>All new housing developments meet CABI Building for Life 'good' standard and schemes over 10 units very good standard</p> <p>New homes meet level 3 Code for Sustainable Homes with move towards level 4 before 2013 and level 6 before 2016. Offices and other non domestic buildings aim for 10% below target emission rate of current building regs by 2016</p> <p>All major developments incorporate renewable or low carbon energy requirement to meet at least 10% of developments residual energy demand</p> <p>Maximising potential for decentralised energy systems</p> <p>Promoting use of local and sustainable materials; preparation site waste management plans to ensure at least 25% total minerals use derived from recycled/reused content</p> <p>All new homes to meet or exceed water conservation standards in level 4 of Code for sustainable homes, offices meet BREEAM, and other buildings achieve efficiency savings of at least 25%</p> <p>Require use of sustainable drainage systems and integrated water management</p> <p>Promote and seek opportunities to introduce similar energy and water efficiency standards and sustainable drainage systems in existing buildings</p>	
<p>Policy SR4 : Improving Air Quality for Sensitive Ecosystems</p> <p>Consider impacts of new developments and increased traffic movements and adopt mitigation measures by :</p> <p>Reducing the need to travel through development of sustainable communities</p>	

<p>Securing sustainable transport choices including use of public transport and reducing the use of car</p> <p>Avoiding siting of new sources of emissions near to sensitive European sites or development that would increase traffic levels on roads near sensitive sites</p> <p>Ensuring air quality effects are considered including use of appropriate traffic management measures</p>	
<p>Urban Renaissance</p>	
<p>Policy UR1 : Implementing Urban Renaissance – the MUAs</p>	
<p>Policy UR2 Towns and Cities outside Major Urban Areas</p>	
<p>UR 3: Enhancing the Role of City, Town and District Centres</p> <p>Sets out measures to achieve the enhancement of centres:</p>	
<p>UR 4: Social Infrastructure</p> <p>Sets out role of local authorities, relating to land use and investment, in improving service delivery</p>	
<p>Communities for the Future</p>	
<p>CF1: Housing within the MUAs</p> <p>Sets out role of housing in supporting Urban Renaissance strategy and emphasises need to maintain balance between employment prospects and housing development and to ensure environmental safeguards</p> <p>Recognises need for choice and variety of good quality housing and need to work with private sector as major provider, the Housing Corporation and registered Social landlords to improve quality of existing stock.</p> <p>Identifies need for significant resources and investment and need for action to renew and redevelop neighbourhoods focussed in areas where risk of problems spreading including Coventry</p>	
<p>CF2: Housing beyond the MUAs</p> <p>Shows how strategic housing development should be concentrated in Settlements of Significant development [that in sub region include Rugby, Nuneaton/Bedworth and Warwick/Leamington]</p>	

<p>CF3: Level and Distribution of New Housing Development</p> <p>Distributes new housing development and promotes joint working.</p>	<p><i>Support level and distribution as based on well grounded strategies to meet need and agree expression of figures for MUAs (including Coventry) as minima</i></p>
<p>CF4: Phasing of New Development</p> <p>Sets out principle and mechanisms for phasing housing land release.</p>	<p><i>Supported as it seeks early delivery of Urban renaissance. However, approach needs to be more robust in the light of changing circumstances and in the light of delivery currently being below trajectory</i></p>
<p>CF5: Reuse of land and buildings for housing</p> <p>Sets out principle of giving priority to development of brownfield land and re-use of existing buildings.</p>	<p><i>Supported, but needs to take account of points made above</i></p>
<p>CF 6: Making Efficient Use of Land</p> <p>local authorities should set out density policies to reflect local circumstances and the findings of housing market assessment . High density development should be encouraged on sites within or very close to strategic town centres and in locations close to public transport interchanges</p>	
<p>CF7: Delivering Affordable Housing</p> <p>Sets out targets for housing market areas and requirements for local authorities to set separate targets for social rented and intermediate affordable housing and to seek to maximise contribution which private sector make</p>	<p><i>Supported with proviso that further work needed to disaggregate figures to authority level and to make point that increasing overall land supply does not necessarily lead to increased affordability</i></p>
<p>CF8: Delivering Mixed Communities</p> <p>Provides a steer towards providing dwelling types appropriate to local needs using evidence from sub regional and local market assessments general mix of types of accommodation required. Consideration of needs of different groups to ensure construction of appropriate mix and need for greater proportion of higher value housing in the MUAs and some other settlements and range of housing types and tenures</p>	
<p>CF9: Sites for Gypsies and Travellers</p>	<p>.</p>

States that development plans should ensure that adequate provision is made	
<p>CF10: Managing Housing Land Supply</p> <p>States that development plans should include measures to manage the release of housing land to ensure development of brownfield and conversions as priority taking account of the need for new infrastructure and ground preparation; avoid undermining urban renaissance. Also requires take account of windfall</p>	
Prosperity for All	
<p>PA1: Prosperity for All</p> <p>States that MUAs (including Coventry) will be primary focus for additional investment in sustainable economic growth and throughout region in Settlements of Significant Development. Emphasises need to ensure appropriate balance between new housing and new employment land provision</p> <p>also sets out ways in which authorities should provide for employment development emphasising sustainability principles and phasing of development so Greenfield only released where no alternative suitable sites available and that development should be capable of being served by rail or high quality public transport within easy access to centres and respect the natural environment.</p>	
<p>PA2 Urban Regeneration Zones</p> <p>Seeks to focus investment in defined zones including Coventry and Nuneaton</p>	
<p>PA3 : High-Technology Corridors</p> <p>defines three corridors including Coventry, Solihull and Warwickshire to encourage diversification of the regional economy three High Technology Corridors are identified within which cluster developments closely linked to the regions research and development capabilities and advanced technologies</p>	
<p>PA4: Development Related to Higher/Further Education</p> <p>States that development plans should facilitate the needs of HE/FE institutions and research facilities to grow and expand</p>	
<p>PA5 : Employment Areas in Need of Modernisation and Renewal</p> <p>Encourages agencies to work together to improve and maintain the physical business environment of established employment areas</p>	
PA6: Portfolio of Employment Land and	

<p>Premises</p> <p>Sets out approach and distribution for employment land requirements including requirement to provide and maintain a range and choice of readily available employment sites as well as stock of premises. Sets out hierarchy of sites :</p> <p>Regional Investment sites</p> <p>Major Investment sites</p> <p>Regional logistic sites</p> <p>Indicates development plans should establish:</p> <p>Sub-regional employment sites</p> <p>Good quality employment sites</p> <p>Other employment sites</p>	
<p>Policy PA6A Employment Land Provision</p> <p>Sets requirement for continuing 5 year reservoir and indicative long term requirement . For Coventry 82 ha with indicative long term 246 ha : note acknowledges unlikely to be sufficient land within Coventry to meet requirements over plan period and that joint discussions required. Also indicates Coventry's needs should be taken fully into account when considering proposals for redevelopment of Peugeot's plant at Ryton</p>	<p><i>Supported, but need to make clear that any changes in housing distribution / levels will necessitate amendment of this policy and may increase pressure to release Greenfield land .</i></p>
<p>PA6B: Protection of Employment Land and Premises</p> <p>Sets out approach to ensuring a continuing supply of available and suitable employment sites</p>	
<p>PA7: Regional Investment Sites (RIS) should be of order of 20-50 hectares</p> <p>Ansty acknowledged as existing RIS</p> <p>High quality sites attractive to national and international investors</p> <p>Served or capable of being served by multi modal transport facilities and broadband IT infrastructure; possess good quality public transport links, or be capable of having such links provided; well related to the motorway and trunk road network; located within, or close to, the areas of greatest need and Accessible to effective education and training opportunities to ensure that the employment benefits are available to the local workforce</p> <p>Policy acknowledges that additional provision may be required to serve the needs of Coventry and Nuneaton regeneration zone</p>	

<p>PA8: Major Investment Sites</p> <p>Intended to meet the need for accommodating very large-scale investment by single users with an international choice of locations in order to help diversify economy. At any one time region should have up to 2 sites readily available</p> <p>Of order of 50 hectares; high quality sites; served by multi-modal transport facilities and broadband IT infrastructure; possess good quality public transport links, or be capable of having such links provided; well related to the motorway and trunk road network but avoiding sites immediately adjacent to motorway junctions where likely to exacerbate congestion problems; located in areas close to a large pool of labour with employment needs; Accessible to effective education and training opportunities to ensure that the employment benefits are available to the local workforce</p>	
<p>Policy PA9: Regional Logistics Sites (RLS)</p> <p>Intended to provide opportunities for the concentrated development of warehousing and distribution uses. RLS with existing or potential for dedicated access to the regional rail and highway networks to be identified in development plans. Sites should be of order of 50 hectares; possess good quality transport links, or be capable of provision; served by multi-modal transport facilities and broadband IT infrastructure; have an easy access to an appropriate labour supply and education and training opportunities; aim to minimise environmental impact; have suitable configuration which allows large scale high-bay warehousing, intermodal terminal facilities, appropriate railway wagon reception facilities and secure parking facilities for all goods vehicles; be located away from incompatible neighbours allowing 24 hour operations and no restrictions on vehicle movements</p>	
<p>PA 10 Tourism and Culture</p>	
<p>PA11: Network of Town and City centres</p> <p>Sets out hierarchy of strategic centres with Coventry as Tier 2 centre after Birmingham. Preferred location for major retailing; uses that attract large numbers of people; large scale office</p>	<p><i>Supported but need clarification of the hierarchy's role / purpose.</i></p>
<p>PA 12 Birmingham's Role as a Global City</p>	
<p>PA12A Comparison Retail Floorspace Requirements 2006 – 26</p> <p>Sets out planned provision for comparison</p>	<p><i>Support approach, drawing attention to both the need for change if population within catchment areas changes</i></p>

<p>floorspace. For Coventry city centre 95000sqm by 2021 and further 55,000 sq m by 2026</p>	<p><i>significantly and the pressure for out of centre development if growth takes place in the catchment area of a centre with capacity constraints.</i></p>
<p>PA12B Non Strategic Centres</p> <p>Local authorities should identify centres to meet local needs</p>	
<p>PA13: Out-of-Centre Retail Developments</p> <p>States that not envisaged that any further large scale (over 10,000 sq m) out of centre developments or extensions will be required during plan period to meet comparison needs. Smaller scale proposals should be considered in accordance with development plan policies taking ull account of government guidance</p>	
<p>PA13A: Office Development Requirements</p> <p>Sets out distribution that local authorities should plan for. For Coventry within or on the edge of the city centre 250,000 sqmetres</p>	<p><i>Support, drawing attention the fact that redistribution of population could lead to over / undersupply of offices in certain locations, with additional pressures for out of centre development and suggesting that, in order to support the Urban Renaissance agenda, ex MUA figures are maxima so as to prevent over allocation through LDFs.??</i></p>
<p>PA13B: Large scale office development outside of strategic centres</p> <p>Office developments with floorspace greater than 500 sq m should be located in or on edge of city centre, Permitted outside city centre only when need cannot be satisfied in centre; no adverse impact on the prospects of committed office development schemes proceeding within centre; adequate pubic transport access exists to all of intended catchment or will be provided as part of the proposal; no unacceptable adverse environmental effects</p>	<p><i>Supported, but need further clarification on offices in non strategic centres and out of centre locations</i></p>
<p>PA13C Regional Casinos</p> <p>Sets criteria for consideration of any proposal</p>	
<p>PA14 Economic Development and the Rural Economy</p>	

PA15 Agriculture and Farm Diversification	
Quality of the Environment	
QE1 Conserving and Enhancing the Environment	
QE2 Restoring degraded areas and managing and creating high quality new environment	
QE3 Creating a high quality built environment for all	
QE4 Greenery, Urban Greenspace and Public Spaces	
QE5 Protection and Enhancement of the Historic Environment	
QE6 The Conservation, Enhancement and Restoration of the regions landscape	
QE7 Protecting, Managing and Enhancing the regions biodiversity and nature conservation resources	
QE 8 Forestry and Woodlands	
QE9 The water environment	
EN1 Energy Generation	
EN2 Energy Conservation	
M1 Mineral Working for Non-Energy Minerals	
M2 Minerals-Aggregates	
M3 Minerals – The use of alternative sources of materials	
M4 Energy Minerals	
W1 Waste Strategy	
W2 Targets for Waste Management	
W3 The Need for Waste Management facilities	
W4 Protection of existing waste management facilities	
W5 The Location of New Waste Management	

Facilities	
W6 Sites outside the Major Urban Areas and Other large settlements	
W7 Waste Management Facilities and Open land	
W8 Hazardous Waste-safeguarding sites	
W9 Construction and Demolition waste	
W10 Sites for Contaminated soils	
W11 New sites for landfill	
W12 Hazardous waste – final disposal sites	
Transport	
T1 Developing Accessibility and mobility within the region to support the spatial strategy	
T2: Reducing the Need to Travel	
T3 : Walking and Cycling	
T4 : Promoting Travel awareness	
T5 Public Transport	
T6: Strategic Park and Ride. Identifies locations none within Coventry	
T7: Car parking standards and management Sets out approach to developing maximum standards	<i>Supported, but needs to discourage overprovision outside MUAs such as Coventry.??</i>
T8: Demand management	Covers measures needed to manage demand on congested highways <i>Supported, but need to confirm that road pricing is not appropriate at this time.</i>
T9 :The Management and Development of National and Regional and Transport Networks	
T10 : Freight	
T11: Airports Sets out roles of airports and approach to	<i>Supported, but needs to be updated for Coventry Airport.</i>

related development	
---------------------	--