

8 December 2008

Rt Hon Margaret Beckett MP
Minister of State for Housing
House of Commons
Westminster
London
SW1A 0AA

Dear Minister

West Midlands Regional Spatial Strategy: Phase Two Revision

The Regional Assembly finds itself in the unprecedented position of having to make representations on our own RSS Phase Two Revision Draft which we submitted to your predecessor in office in December 2007. I thought I should write to you personally to explain why we have decided to do this.

Following our submission last December, we received a letter from your colleague Baroness Kay Andrews on 8 January 2008. This informed us that she felt the Assembly's submitted housing targets were not high enough to meet the Government's aspirations. Baroness Andrews therefore asked the Government Office for the West Midlands (GOWM) to commission a study into higher regional housing ranges, in the light of advice from your National Housing and Planning Advice Unit (NHPAU). Although the study was intended to be technical advice to inform the Examination in Public Panel, the Assembly felt it to be of such fundamental concern to the Region that we agreed to extend the period of public representations on the Phase Two Revision. This was to enable all regional partners and stakeholders to comment both on the Phase Two Revision itself and on the impact of the Government commissioned housing study on it. Due to GOWM having difficulty letting the contract for this study, the representation period had to be extended twice and finally ended on 8 December, almost a full twelve months after our original submission.

Last summer, we exchanged letters with your predecessor Caroline Flint. This correspondence clarified that the commissioned housing study would, in the West Midlands uniquely, meet her requirement that the NHPAU advice be tested by Regional Assemblies through the RSS process. This saved the Assembly having to

abandon and re-start our RSS Phase Two Revision. It has, however, meant that we have not been able to oversee the process as the statutory Regional Planning Body and have been forced to make representations on our own RSS submission and a study controlled by GOWM into which we had very limited input. This is an issue on which I expressed my considerable concerns and disappointment in writing to Caroline Flint and I am at least grateful that this resulted in some slightly improved consultation by GOWM towards the end of the study preparation period. However, overall the Assembly was granted very little input into the study.

The housing study produced on the Government's behalf by consultants Nathaniel Lichfield and Partners (NLP) was finally published at the beginning of October. This gave the Assembly and its regional partners only little time to examine it and make representations by the 8 December deadline. We have now done this and have serious concerns about the potential implications for the approved RSS strategy that flow from its recommendations.

I firstly need to re-iterate the obvious point that we have submitted Revisions to the Government's own approved Regional Spatial Strategy for the West Midlands. In this document, the Government emphasises the need for us to pursue the central aims of urban and rural renaissance. We believe this to be your continued policy because of the Phase One Revision to the RSS that your colleague Minister Baroness Andrews approved in January 2008 in respect of the Black Country sub-region. The Minister said that this Revision "will support the much needed regeneration of the sub-region".

Indeed in October 2008, your Department dismissed a series of appeals for residential and associated development on sites in South Staffordshire District, close to the West Midlands Conurbation. In your decision letters you emphasise the detrimental impact on urban renaissance that these developments would have. It was agreed with Government from the outset that the RSS Revision, including Phase Two, would further develop and strengthen the existing overall strategy and that it is not a review of fundamental principles of the approved RSS.

The NLP housing study proposes increased green field housing development spread across the Region, with emphasis on the south easterly parts where market demand is perceived to be strongest. This is fundamentally at odds with the urban renaissance strategy to which both the Government and the Assembly are committed. It undermines our attempts to re-focus housing and regeneration activity on the Region's major urban areas where need is concentrated and most severe.

The Assembly and its partners feel a high degree of frustration and concern with this situation. Our RSS Phase Two Revision proposes the highest ever level of house building in the Region. Indeed, the proposed target of an additional 365,600 by 2026 more than doubles the Government's own target of 180,000 contained in Regional Planning Guidance 11. The Assembly has also set very ambitious targets for provision of affordable housing, so critical to maintaining and creating sustainable communities.

Our Phase Two Revision submitted to your predecessor was, moreover, based on the almost unanimous support of the Region's local planning authorities and other regional stakeholders. The Phase Two Revision was also closely aligned with the West Midlands Economic Strategy which was revised in tandem with the RSS. Through the West Midlands' unique degree of partnership working, we were able to achieve this high consensus, thereby managing the historic tensions between city and shire that fifty years of population overspill have generated. Even more than this, we achieved support, not just for higher housing targets in the conurbation, but also higher housing targets for a series of shire "settlements of significant development" such as Worcester and Burton on Trent. This degree of development across the region is based on your Government's sensible "brown field first" policy. It was accepted by the Assembly that some green field development, and indeed some release of Green Belt in sustainable locations was necessary to achieve this ambitious target, but the NLP study takes this far beyond of what is desirable and sustainable for the Region.

We now feel that all this effort has been wasted because of Baroness Andrew's response on behalf of the Government, unhelpfully coming as it did immediately after our Phase Two submission rather than during the process of Revision formulation itself, a process in which Government Office played an active part. Without this intervention, we could by now (on the jointly agreed original programme) have completed the Examination in Public and be awaiting the Panel's report to you, with a prospect of your decision early next year and speedy delivery of higher housing targets. As it is, we must wait for an Examination in Public that will not close until at least late June next year.

We are frustrated, too, because we believe the package of policies submitted in the Phase Two Revision was integrated, sustainable and deliverable. We do not believe that the NLP housing study has any of these characteristics. Rather, it has only served to move the public debate and focus from the policies needed to create sustainable communities to a mechanistic argument over housing numbers.

The Assembly has severe concerns about the NLP study and its conclusions, including:

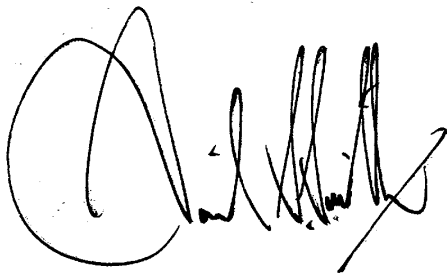
- The lack of understanding of the West Midlands Region and the Urban and Rural Renaissance strategy in the approved RSS;
- The propositions in the study would undermine the Government's own RSS strategy for Urban and Rural Renaissance in the West Midlands;
- Great concerns about the deliverability of the NLP proposals, especially in the light of current economic and financial circumstances and the longer term effects on private sector and Government spending; and
- The completely inadequate and insufficient consideration and costing of infrastructure implications and requirements which, again, raise serious concerns about the deliverability and sustainability of the NLP proposals.

Finally, I must record on behalf of our local government partners the damage this has done to the delivery of development plans system in the West Midlands. We appreciate fully that the 2004 Act requires RSS Revisions and Local Development Frameworks to be progressed in parallel; but the above outlined delays are creating great difficulties for local planning authorities in framing options that have to anticipate what you may decide at the end of the RSS Revision process.

I appreciate that you will not wish to comment in detail on the merits of your commissioned housing study outside the Examination in Public process. The Assembly would nonetheless appreciate your assurances that the strategy of urban and rural renaissance – coupled with appropriately located higher housing targets – on which we are expending such efforts to take forward, is indeed the Government's continuing policy for the West Midlands Region.

I would be most grateful to receive your response to the serious concerns outlined in this letter and to receive your assurances as requested.

Yours Sincerely,



Cllr David S Smith
Chairman, WMRA