

**West Midlands Regional Spatial Strategy
Phase Two Revision - Examination in Public**

Housing Background Paper Supplement

March 2009

[Note: This paper has been prepared to supplement the Communities for the Future Housing Background Paper (EiP Core Document CD31) and both papers should be read in conjunction with one another.]

This paper has been prepared on behalf of the West Midlands Regional Assembly (WMRA), the Regional Planning Body, as technical background information to inform the West Midlands Regional Spatial Strategy (WMRSS) Revision Examination in Public (EiP) process. It is one of a suite of documents prepared by/on behalf of WMRA to inform the WMRSS Revision process.

Every effort has been made to verify and check the contents of this report, including all figures and tables. However, the West Midlands Regional Assembly cannot accept any responsibility for errors, inaccuracies, omissions or misrepresentations.

1.0 Introduction

1.1 Introduction

This paper has been developed to assist those involved in the WMRSS Revision process and in particular the Panel appointed to oversee the Examination in Public (EIP). This is in particular in response to a request from the EIP Panel on 9th January 2009 in advance of the First Preliminary Meeting that it would be helpful if the Assembly could explain how it moved from the 340,000 dwellings 'Reference Point' to the 365,600 dwellings in the Preferred Option during the period May to October 2007¹. This paper has therefore been prepared to supplement the Communities for the Future Housing Background Paper and both papers should be read in conjunction with one another. And of course both papers relate back to the policy position set out in the WMRSS Phase Two Revision Draft.

The specific purpose of this supplementary paper is to inform and explain in more detail the process that was undertaken by the West Midlands Regional Assembly, as Regional Planning Body (RPB), in developing the WMRSS Phase Two Preferred Option for Housing from May 2007 to October 2007. This process includes the following elements:

- The development of the Preferred Option housing provision figure and the process that was undertaken during that period in moving from a housing distribution figure of 340,000 to 365,600 (net) dwellings between 2006 - 2026;
- The sub-regional analysis that was used in setting out the justification for the regional housing distribution; and
- The inter-relationship between the planning and the housing market areas across the region.

This supplementary paper draws together and consolidates existing background information, mainly from already published sources, including the main Housing Background Paper, the Phase Two Revision Draft document and reports to the WMRA's Regional Planning Partnership in 2007.

For purposes of clarity, it should also be noted that this paper describes a particular stage in the process and has not been updated to reflect any changes in circumstances since the Phase Two Revision Draft was submitted in December 2007. Similarly, the paper does not attempt to summarise the whole process of the

¹ Cf. WMRSS Phase Two Revision, Communities for the Future Housing Background Paper, January 2008 [EIP Core Document (CD) 31], paras 11.4 to 11.7.

development of the Preferred Option but is part of a suite of documents and technical studies. In particular, it does not summarise the various pieces of technical work that were undertaken alongside the material presented in this paper, including the Sustainability Appraisal/Strategic Environment Assessment, Habitats Regulations Assessment, Risk Assessment, Rural Proofing, the Advice from the Section 4(4) Strategic Authorities and the detailed assessment of the infrastructure implications of the Preferred Option. All these technical studies are available on the Assembly website at:
[http://www.wmra.gov.uk/Planning and Regional Spatial Strategy/Technical Work.aspx](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/Technical_Work.aspx) .

The following sections provide further information of how this process of developing the Preferred Option in May to October 2007 was taken forward.

1.2 Developing the Housing Preferred Option

The process of developing the Housing Preferred Option commenced in May 2007 following the completion and analysis of the RSS Phase Two Spatial Options consultation (8th January 2007 – 5th March 2007).

The Spatial Options developed for the future regional housing distribution set out three spatial options for consultation:

- **Spatial Option One:** 381,000 dwellings gross (293,000 net). This option was based, at the Strategic Authority level, on the continuation of the current WMRSS (RPG 11) proposals taking into account the principles of the RSS to support urban and rural renaissance.
- **Spatial Option Two:** 491,200 dwellings gross (376,700 net). This option was derived from the responses and initial advice of the Section 4(4) authorities in developing the Spatial Options. This option proposed a wider spread of development than in Option One by proposing growth in other settlements as well as the named sub-regional foci settlements. It was believed that this level of distribution could still support the RSS principles and strategy.
- **Spatial Option Three:** 575,000 dwellings gross (460,000 net). This Option set out a higher level of housing requirement in order to meet the 2003-based household projections. The option, which was 83,800 dwellings above Option Two, built on the distribution of housing as set in Option Two as well as parts of the region where the 2003-based household projections demonstrated a relatively higher level of housing demand.

In May 2007 (18th May), a Seminar was held for Members of the Regional Planning Partnership (RPP) to explain the main issues arising out of the RSS Spatial Options consultation, and the process, needs and challenges to be taken into account in developing the Preferred Option.

In relation to the housing distribution and developing the Preferred Option the following key elements had emerged from the Spatial Options:

- The Government published the 2004-based household projections (March 2007) which suggested an increase of 14,000 households above the 2003-based projections (suggesting an overall requirement of 589,000 gross dwellings);
- In line with GOWM advice the future housing numbers were to be determined on a 'net' basis (as opposed to the gross figures used at the Options stage); and
- Following suggestions from the Spatial Options consultation it was agreed that the future provision should be based over the period 2006 – 2026 rather than 2001 – 2026. The housing and household projection figures were amended accordingly.

The Members' Seminar set out the technical background to the housing numbers.

2.0 Regional Housing Demand

2.1 Introduction




The 2004-based household projections demonstrated the projected changing structure of households across the Region 2006-2026, indicating that almost 80% of the growth was to be generated from single person households. When factoring in the projected change in household growth it suggested that the net demand amounted to 370,000 households 2006 – 2026 (rounded figure).

2.2 Regional Housing Demand

The net demand for households from the 2004 based projections suggested a projected increase in demand for 370,000 households. In converting this level of need to demand for dwellings, a 3% vacancy rate for new housing stock was built into the calculation and this resulted in an overall estimate of new housing demand to be 382,000 (net) dwellings 2006 – 2026. This figure is equivalent to a gross figure of 589,000 for a 25-year period and is in excess of Option 3 of the Spatial Options consultation by 14,000 households.

The diagram below (Figure 2.1) was used to explain the process to Members and is included in the main Housing Background Paper.

Figure 2.1: Regional Housing Demand

	2003-based household projections (2001-2026)		2004-based household projections
Change from 2003 to 2004 based household projections	575,000 (Spatial Option 3)		589,000 gross (2001-2026)
			
Change in timescale to 2006-2026 (from household projections)			471,000 gross (2006-2026)
			
Change in net figures (by subtracting demolitions)			382,000 net* (2006 – 2026)
* Equivalent to household projections changes plus 3% vacancy assumptions.			

Source: WMRA 2007

3.0 Regional Housing Supply

3.1 Introduction

Following the Spatial Options consultation, Members of the Assembly's Regional Planning Partnership (RPP) were informed of the key headline responses emerging from the consultation. They were also informed of the initial picture which emerged from the Local Authorities, including Section 4(4) Authorities, in that they re-affirmed their support for the spatial strategy and support for the development of around 410,000 dwellings (gross) between 2006-2026, this equated to a provision of approximately 340,000 dwellings net.

This figure was between Option 2 and Option 3 of the options consultation see Table 3.1 below. However it should be noted that not every individual district supported housing distribution between Options 2 & 3.

Table 3.1 Comparisons of "Working Figure" to Spatial Options.

Planning Area	"Working Figure" June 2007	Equivalent to Spatial Option
Birmingham	40,600	Option 2
Coventry	18,100	Option 2
Black Country	61,200	Option 2
Solihull	7,600	Option 2
Metropolitan Area	127,500	Option 2
Shropshire	24,800	Above Option 3
Bridgnorth	2,500	Option 2/3
North Shropshire	6,100	Above Option 3
Oswestry	3,100	Option 2/3
Shrewsbury & Atcham	8,200	Option 2/3
South Shropshire	4,900	Above Option 3
Telford and Wrekin	26,500	Option 2
Staffordshire	53,900	Above Option 2
Cannock Chase	4,800	Option 2/3
East Staffordshire	12,900	Option 2/3
Lichfield	7,900	Option 2
Newcastle – under-Lyme	5,700	Option 2/3
South Staffordshire	3,500	Option 2/3
Stafford	10,100	Option 2/3
Staffordshire Moorlands	6,000	Above Option 3
Tamworth	2,900	Option 2
Stoke on Trent	11,800	Option 2/3
Warwickshire	40,900	Above Option 2
North Warwickshire	3,000	Option 2/3
Nuneaton and Bedworth	10,100	Option 2
Rugby	10,900	Option 2
Stratford on Avon	5,600	Option 2/3
Warwick	11,300	Option 3
Worcestershire	36,600	Option 2/3
Bromsgrove	2,100	Option 2
Redditch	6,600	Option 2
Malvern Hills	4,900	Option 2/3
Worcester	10,500	Option 2
Wychavon	9,100	Option 2
Wyre Forest	3,400	Above Option 3
Herefordshire	16,600	Option 2
Shire and Unitary Authorities	210,900	Above Option 2
Major Urban Areas	145,100	Option 2

Planning Area	"Working Figure" June 2007	Equivalent to Spatial Option
Other Areas	193,400	Above Option 2
West Midlands Region	338,500	Above Option 2

Source: WMRA 2007

4.0 Developing the Preferred Option

4.1 Introduction

Following the Members' Seminar on the 18th May 2007, a report setting out the context to the development of the Preferred Option was reported to RPP on the 31st May 2007. It was reported to Members that the comparison of the 382,000 net demand figure (2006-2026) and the initial assessment of 340,000 net potential supply demonstrated an initial gap of around 42,000 dwellings. Members were requested to approve officer recommendations to explore how the gap between housing demand and supply could be closed in a way that was still consistent with the underlying principles of the RSS strategy and which would demonstrate that the process was robustly tested and soundly based. This included an agreement that the Birmingham, Coventry and Black Country City Region² figures should be regarded as minima³.

Following Members' approval, officers in developing the Preferred Option and in identifying how the initial gap between supply and demand could be closed, took a number of factors into account, including the emerging findings from a range of technical evidence and assessments that were being undertaken. The outcomes from these studies influenced the final Preferred Option figure, which was arrived at, the future distribution of housing growth and the phasing of the development:

1. The level and distribution of future housing growth was worked through a process which took into account the underlying principles of the RSS i.e. where development supported the Urban and Rural Renaissance agenda, the focus on the MUAs over non MUAs, the need to stem outward migration, the most sustainable forms of development in terms of transport and related infrastructure.
2. The conclusions of Phase One of the RSS Phase Two Revision Infrastructure Study. This study suggested that there were no identified 'showstoppers', which would prevent the level of development being accommodated in the Region. However, it did clearly identify that much of the development would not proceed without significant investment in infrastructure. This included investment to relieve congestion in the MUAs, investment to bring brownfield sites forward for development, improvements to water resource provision towards the latter part of the RSS period,

² The City Region comprises of Birmingham, Coventry, Solihull, Dudley, Sandwell, Walsall, Wolverhampton and Telford.

³ It should be noted that as the Preferred Option was finalised it was clarified that the proposals for Birmingham, the Black Country and Solihull (that part within the MUA) should be regarded as minima (see WMRSS Phase Two Revision Draft Policy CF3).

improvements to sewage and drainage systems, investment on flood defences in the built up areas, namely Worcester, Burton upon Trent, Stafford and Shrewsbury and finally investment in new transport facilities around the Settlements of Significant Development and New Growth Points;

3. The findings of the refresh of the Regional Housing Land Capacity Study 2007, which identified the capacity across the Region to accommodate additional growth;
4. Consideration of the emerging findings and comments from the Habitats Regulations Assessment, the Regional Flood Risk Appraisal, the Sustainability Appraisal and the Rural Proofing exercise. The findings from each of these assessments were on-going throughout the RSS Phase Two process. However, officers from the Regional Assembly worked closely with the consultants and officers to determine how any adverse impacts, resulting from the level of housing growth and distribution across the region, could be best mitigated. A key example being the impact of future housing distribution upon the urban renaissance and rural renaissance agenda, sustainability factors and environmental impacts upon habitats for example development around Hereford and Cannock. In relation to the Rural Proofing process, matters around housing provision, meeting local need and affordability and access to supporting services were key factors to be taken into account.
5. WMRA officers held discussions with local authorities including the City Region authorities and Section 4(4) Authorities, the sub-regional foci and other authorities with growth aspirations in order to identify additional housing capacity and supply in a way that was consistent with the underlying principles of the RSS strategy. To help aid these discussions, a "Working Figures" table was then produced setting out the distribution of the 340,000 working figure supply figures (see Table 4.1 below). This table was not made public until the RPP meeting on 24th September 2007 and prior to this was used purely for internal officer working purposes. For illustration purposes, Table 4.1 has included housing demand figures for each local authority using the 2004- based household projections (issued in March 2007) and an allowance for 3% vacancy levels was built in. When compared against the "Working Figure" as of June 2007, the final column has identified the arithmetic shortfall between housing demand and supply to be in the region of 43,000 dwellings.

Table 4.1: Projected Housing Demand and RSS "Working Figures"

Planning Area	Household demand ⁴	Household Change plus 3% vacancy	"Working Figure"	Shortfall between working figure and household change
Birmingham	65,000	66,950	40,600	-26,350
Coventry	14,000	14,420	18,100	3,680
Black Country	51,000	52,530	61,200	8,670
Solihull	11,000	11,300	7,600	-3,700
Metropolitan Area	140,000	144, 200	127,500	-16,700
Shropshire	27,000	27,800	24,800	-3,000
Bridgnorth	3,000	3,090	2,500	-590
North Shropshire	6,000	6,180	6,100	-80
Oswestry	5,000	5,150	3,100	-2,050
Shrewsbury & Atcham	7,000	7,210	8,200	990
South Shropshire	5,000	5,150	4,900	-250
Telford and Wrekin	16,000	16,480	26,500	10,020
Staffordshire	48,000	49,440	53,900	4,460
Cannock Chase	5,000	5,150	4,800	-350
East Staffordshire	10,000	10,300	12,900	2,600
Lichfield	6,000	6,180	7,900	1,720
Newcastle – under-Lyme	6,000	6,180	5,700	-480
South Staffordshire	3,000	3,090	3,500	410
Stafford	8,000	8,240	10,100	1,860
Staffordshire Moorlands	5,000	5,150	6,000	850
Tamworth	4,000	4,120	2,900	-1,220
Stoke on Trent	6,000	6,180	11,800	5,620
Warwickshire	69,000	71,170	40,900	-30,270
North Warwickshire	4,000	4,120	3,000	-1,120
Nuneaton and Bedworth	8,000	8,240	10,100	1,860
Rugby	10,000	10,300	10,900	600
Stratford on Avon	17,000	17,150	5,600	-11,550
Warwick	30,000	30,900	11,300	-19,600
Worcestershire	49,000	50,470	36,600	-14,070
Bromsgrove	8,000	8,240	2,100	-6,140
Redditch	6,000	7,210	6,600	-610
Malvern Hills	7,000	6,180	4,900	-1,280
Worcester	8,000	8,240	10,500	2,260
Wychavon	13,000	13,390	9,100	-4,290
Wyre Forest	7,000	7,210	3,400	-3,810
Herefordshire	18,000	18,540	16,600	-1,940

⁴ 2004-based Sub National Household Projections (DCLG March 2006)

Planning Area	Household demand ⁴	Household Change plus 3% vacancy	"Working Figure"	Shortfall between working figure and household change
Shire and Unitary	233,000	239,990	210,900	-29,090
Major Urban Areas	152,000	156,560	145,100	-11,460
Other areas	221,000	227,630	193,400	-34,230
West Midlands Region				- 43,630

Source: WMRA 2007

4.2 Developing the Preferred Option

Following on from the RPP meeting on the 31st May 2007, a series of discussions were held between June and July 2007 with officers of the Section 4(4) Authorities, the City Region and the districts. These discussions were held to determine the growth aspirations of local authorities, whether the responses to the Spatial Options consultation had been interpreted correctly, and to explore ways in which the gap between potential housing supply and housing demand could be closed in a way that was consistent with the underlying principles of the RSS strategy.

The key elements emerging from these discussions have been summarised below:

- Overall support for a growth agenda for the City Region based on Urban Renaissance principles which was reflected by an increase in the housing supply figures for Birmingham (additional 10,000) and Coventry (additional 15,400);
- A period of restraint and/or 'phasing' within the North Staffordshire conurbation to reflect the area's weak housing market characteristics and to support the HMR Pathfinder RENEW;
- Some local authorities outside the MUAs and the New Growth Points – Wychavon, Cannock Chase and Oswestry - identified capacity to accommodate and increase the level of housing provision to reflect their own growth aspirations and requirements to address issues of affordability; and
- It was also identified that in some areas the most sustainable location for meeting some of the housing needs of one local authority could be in adjoining local authorities. These being as follows:
 - Malvern and Wychavon would need to accommodate housing provision in relation to Worcester City;
 - In the case of Redditch some of its housing provision would need to be made in the adjoining authorities Bromsgrove and/or Stratford on Avon;

- Birmingham and Bromsgrove in relation to Birmingham;
- Stoke on Trent and Newcastle-under-Lyme in relation to North Staffordshire conurbation;
- The four Black Country Boroughs in relation to Wolverhampton, Walsall, Sandwell and Dudley;
- Stafford and South Staffordshire in relation to Stafford town;
- Cannock Chase, Lichfield and Stafford in relation to Rugeley;
- Tamworth, Lichfield and North Warwickshire in relation to Tamworth and Lichfield Districts;
- East Staffordshire and South Derbyshire in relation to Burton upon Trent;
- Coventry, Nuneaton & Bedworth and Warwick in relation to Coventry.

It should be noted that for some of the above locations, it was acknowledged that further studies would need to be undertaken at the local level to determine the most sustainable and appropriate locations for development⁵. Further details are provided in the footnotes, which accompany Table 4.3.

Following the discussions with officers, it was agreed at a meeting of the RSS Strategic Management Steering Group in July 2007, that WMRA should write to the Chief Executive of each local authority asking them to check and confirm whether the draft housing provision figures correctly reflected the strategic view of authority and tied in with the Council's growth aspirations over the RSS period, were based upon technical evidence and tied into the overall principles of the RSS. A copy of the "Working Figures" table (Table 4.2) was circulated to each Chief Executive and amended accordingly.

⁵ In relation to Coventry, Lichfield, Stafford Town, Redditch and Worcester City

Table 4.2: RSS "Working Figures" with Suggested Additions

Planning Area	"Working Figure" June 2007	Suggested changes to working figure following discussions with LAs	Suggested total proposals (Net) 2006 – 2026	Shortfall between working figure and household change and 3% vacancy allowance
Birmingham	40,600	+10,000	50,600	-16,350
Coventry	18,100	+15,000	33,500	19,080
Black Country	61,200		61,200	8,670
Solihull	7,600		7,600	-3,700
Metropolitan Area	127,500		152,900	-16,700
Shropshire	24,800		25,700	-2,100
Bridgnorth	2,500		2,500	-590
North Shropshire	6,100		6,100	-80
Oswestry	3,100	+900	4,000	-1,150
Shrewsbury & Atcham	8,200		8,200	990
South Shropshire	4,900		4,900	-250
Telford and Wrekin	26,500		26,500	10,020
Staffordshire	53,800		54,900	5,460
Cannock Chase	4,800	+1,000	5,800	650
East Staffordshire	12,900		12,900	2,600
Lichfield	7,900	+100	8,000	1,820
Newcastle – under-Lyme	5,700		5,700	-480
South Staffordshire	3,500		3,500	410
Stafford	10,100		10,100	1,860
Staffordshire Moorlands	6,000		6,000	850
Tamworth	2,900		2,900	-1,220
Stoke on Trent	11,800	- 3,400	8,400	2,220
Warwickshire	40,900		41,000	-30,170
North Warwickshire	3,000		3,000	-1,120
Nuneaton and Bedworth	10,100	+700	10,800	2,560
Rugby	10,900	-100	10,800	500
Stratford on Avon	5,600		5,600	-11,550
Warwick	11,300	-500	10,800	-20,100
Worcestershire	36,600		36,600	-13,870
Bromsgrove	2,100		2,100	-6,140
Redditch	6,600		6,600	-610
Malvern Hills	4,900		4,900	-1,280
Worcester	10,500		10,500	2,260
Wychavon	9,100		9,100	-4,290
Wyre Forest	3,400		3,400	
				-3,810

Planning Area	"Working Figure" June 2007	Suggested changes to working figure following discussions with LAs	Suggested total proposals (Net) 2006 – 2026	Shortfall between working figure and household change and 3% vacancy allowance
Herefordshire	16,600		16,600	-1,940
Shire and Unitary	210,900		209,700	-30,290
Major Urban Areas	145,100		165,900	9,340
Other areas	193,400		196,700	-30,930
West Midlands Region				-19,530

Source: WMRA July 2007

Following the advice from the Chief Executives, a report setting the draft housing numbers providing a total of 362,600 dwellings was presented to a joint meeting of the RSS Task Group and Regional Advisory Group (RAG) on the 5th September 2007.

At this meeting officers were presented with the table of the draft housing numbers. The views of the Section 4 (4) Authorities were discussed at the meeting. The main issues raised were that, although the Strategic Authorities were in general agreement with the housing numbers that were put forward, it was clear that this level of growth could only be delivered subject to the necessary infrastructure and investment being in place and at the right time. This requirement was underpinned by the work on infrastructure requirements and implications study that was carried out in parallel and which informed the housing proposals and the preparation of the Draft Implementation Plan. It was also recognised that there was a need to release greenbelt in selected locations where this would represent the most sustainable form of development and to make cross local authority boundary allocations in certain areas (see below).

4.3 Draft Preferred Option

A report was presented to RPP at its meeting on the 24th September 2007. This report set out for Members the process that has been undertaken in developing the Preferred Option, the findings and implications arising from the technical work and the outcome of various officer and regional meetings.

The draft Preferred Option housing number of 362,500 (including the working figures, suggested changes and the outcome of discussions with local authorities) was presented to Members. Members were asked to provide officers with a final steer as to whether the approach undertaken in developing the housing figures was broadly acceptable before the proposals were to be firmed up in advance of the October 2007 RPP meeting. At the October meeting Members would be asked to endorse the Preferred Option for submission to the Secretary of State.

Between September and October 2007 the Preferred Option was finalised. In relation to the housing Preferred Option a number of changes were made to the final housing provision. These were as follows:

- The level of housing provision for Stoke on Trent was increased by 3,000 dwellings (11,400 net) subject to appropriate phasing to protect the fragile housing market in this MUA. This figure was increased following discussions with and on the advice of officers from Stoke City Council. It was agreed that the increased figure, in connection with appropriate phasing, could support the renaissance of the North Staffordshire conurbation (including the housing market restructuring programme) post 2016. On this base the increased provision would come forward post 2016 and this was reflected in the phasing of the housing numbers for Stoke on Trent in the Preferred Option;
- Some local authorities advised that adjustments be made to the balance between housing development in named settlements and the rest of the district⁶; and
- Additional footnotes were added to clarify the potential cross boundary housing provision based upon the advice of the S4 (4) Authorities⁷.

4.4 The Final Preferred Option

Following the above amendments the final Preferred Option housing provision table was presented to RPP members at its meeting on the 22nd October 2007 for sign off. This table (4.3) reflected the additional provision for Stoke on Trent, which increased the overall figure to 365,600, and the cross boundary and named settlement distribution of housing provision.

⁶ For example: For **Shrewsbury & Atcham** 75% of the District allocation should be made in and around Shrewsbury. For **Telford & Wrekin**, 90% of the District allocation should be made in and around Telford. For **East Staffordshire**, 90% of the District allocation should be made in and around Burton upon Trent. For **Newcastle under Lyme**, 80% of the District allocation should be made within the general Newcastle urban area which forms the North Staffordshire conurbation. **Stafford District**, 70% of the District allocation should be within or around Stafford town. For **Rugby**, 90% of the District allocation should be in and around Rugby. For **Herefordshire**, 50% of the authority's allocation should be in and around Hereford.

⁷ Advice received from Warwickshire County Council and Coventry suggested that in the case of Coventry, some of the City Council's allocation may need to be made in Nuneaton & Bedworth and Warwick Districts. In the case of Bromsgrove consideration will need to be given to meet the needs of Redditch. In the case of Redditch, consideration will need to be given to its growth requirements in conjunction with land in Bromsgrove and Stratford on Avon Districts. In the case of Worcester City, the distribution of the City's housing allocation will need to be determined as part of the joint Core Strategy between Worcester City, Malvern Hills and Wychavon.

Table 4.3: Preferred Option Housing Distribution 2006-2026

Planning Area	Proposal Total (Net)	Indicative annual average
	2006 – 2026	2006 – 2026
Birmingham ^(a)	50,600	2,530
Coventry ^(b)	33,500	1,675
Black Country	61,200	3,060
Solihull	7,600	380
Metropolitan Area	152,900	7,645
Shropshire	25,700	1,285
Bridgnorth	2,500	125
North Shropshire	6,100	305
Oswestry	4,000	200
Shrewsbury & Atcham	8,200	410
<i>of which Shrewsbury</i>	<i>6,200</i>	<i>310</i>
South Shropshire	4,900	245
Telford and Wrekin	26,500	1,325
<i>of which Telford</i>	<i>25,000</i>	<i>1,250</i>
Staffordshire	54,900	2,745
Cannock Chase	5,800	290
East Staffordshire	12,900	645
<i>of which Burton upon Trent</i>	<i>11,000</i>	<i>550</i>
Lichfield ^(c)	8,000	400
Newcastle – under-Lyme	5,700	285
<i>of which Newcastle urban area</i>	<i>4,800</i>	<i>240</i>
South Staffordshire	3,500	175
Stafford	10,100	505
<i>of which Stafford Town ^(d)</i>	<i>7,000</i>	<i>350</i>
Staffordshire Moorlands	6,000	300
Tamworth	2,900	145
Stoke on Trent	11,400	570
Warwickshire	41,000	2,050
North Warwickshire	3,000	150
Nuneaton and Bedworth	10,800	540
Rugby	10,800	540
<i>of which Rugby town</i>	<i>9,800</i>	<i>490</i>
Stratford on Avon ^(e)	5,600	280
Warwick	10,800	540
Worcestershire	36,600	1,830
Bromsgrove ^(e)	2,100	105
Redditch ^(e)	6,600	330
Malvern Hills ^(f)	4,900	245

Planning Area	Proposal Total (Net)	Indicative annual average
	2006 – 2026	2006 – 2026
Worcester ^(f)	10,500	525
Wychavon ^(f)	9,100	455
Wyre Forest	3,400	170
Herefordshire	16,600	830
<i>of which Hereford City</i>	<i>8,300</i>	<i>415</i>
Shire and Unitary Authorities	212,700	10,635
Major Urban Areas ^(g)	169,100	8,455
Other areas	196,500	9,825
West Midlands Region	365,600	18,280

Source: WMRA October 2007

Footnotes:

- a) *Of the total provision for Birmingham, around 700 dwellings will be provided at Longbridge, in Bromsgrove District.*
- b) *Dependant upon the capacity in Coventry and the outcome of further studies, some allocation could be made adjacent to Coventry within Nuneaton & Bedworth and Warwick Districts.*
- c) *Of the 8,000 figure for Lichfield, dependant upon the outcome of further local studies, some allocations could be made relating to Tamworth and Rugeley.*
- d) *Dependant upon the outcome of further local studies, some of the Stafford town allocation could be made adjacent to the settlement in South Staffordshire District.*
- e) *Redditch figure of 6,600 includes, 3,300 for Redditch and 3,300 adjacent to Redditch town in Bromsgrove and/or Stratford on Avon Districts.*
- f) *Of the figure of 10,500 for Worcester; 3,200 will be within Worcester City and 7,300 will be adjacent to the City within the surrounding districts of Malvern Hills and Wychavon.*
- g) *Includes the Newcastle urban area.*

5.0 Sub-Regional Focus of the RSS

5.1 Introduction

In developing the RSS Phase Two Preferred Option it was agreed by Members of RPP at its meeting of the 31st May 2007, that the key elements in developing the Preferred Option should be reinforced as being:

- the integrity of the current RSS should be maintained and the 'step-change' approach to urban renaissance was crucial to the region;
- the spatial strategy must be shown to be adequately flexible and robust to be able to meet future needs, including higher levels of housing growth to be achieved through the City Region's growth strategies and further supported by proposals coming forward in the Sub-regional Foci, i.e. Telford, Worcester, Hereford, Shrewsbury, Rugby and Burton (now known as Settlements of Significant Development) and other appropriate settlements;
- acknowledgment that development in rural areas should be at a scale that ensures adequate provision for affordable housing, but not at the expense of attracting people and investment from the MUAs or damaging environmental assets;
- agreement that the Green Belt will continue to be an important component of the strategy, particularly its role in avoiding the coalescence between settlements and supporting urban renaissance. However, it was acknowledged that small adjustments may be appropriate in certain exceptional cases if necessary to allow for the most sustainable form of development; and
- acknowledgement that any housing figures for the Birmingham, Black Country and Solihull MUA should be regarded as minima to reflect their growth aspirations. However, beyond the MUAs, growth in housing provision should be focused in areas capable of balanced and sustainable growth, including in existing sub-regional foci and new growth point proposals.

5.2 Developing the Sub-Regional Focus of the RSS

Given that Structure Plans would no longer set out sub-regional strategies, it was considered appropriate that in developing the Preferred Option and the revisions to the RSS, the sub-regional elements of the RSS should be strengthened to

describe the sub-regional components of the overall Spatial Strategy. This would reflect the updated strategic policy perspectives around the sub-regions, and underpin the context in relation to the strategic choices in developing the Preferred Option and particularly the revised housing policies set out in Chapter 6.

Discussions held with GOWM advised that the RSS should be maintained as a regional strategy and that there was no requirement to develop separate sub-regional strategy chapters in the RSS. However, the revised document should provide more clarity around the sub-regional perspective. It was therefore advised that the existing Strategy Section (Chapter 3) be amended to include a stronger sub-regional focus and to include updated text around the role and function of each place within the Region.

Since the publication of RPG 11 in 2004, policy development within the Region has continued to evolve including the publication of the Regional Housing Strategy in 2005, the City Region approach and the review of the Regional Economic Strategy (2007). Both the Regional Housing Strategy (RHS) and the Regional Economic Strategy (RES) were developed in close alignment with the principles of the RSS. The opportunity to reinforce this alignment within the revised RSS was made by the introduction of a new section on the RHS and the RES.

On this basis it was proposed that the Regional Assembly would amend and coordinate the redrafting of Chapter 3 of the current RSS to incorporate a new section setting out the sub-regional implications for the revised Spatial Strategy (see sub-sections 3.23 to 3.74 in the Preferred Option). A key element of this approach established the inter-relationship between the sub-regions and the revised policies, in particular the Communities for the Future Chapter (Chapter 6), and the Prosperity for All Chapter (Chapter 7).

The key elements of the sub-regional perspective in relation to both future housing provision and distribution are summarised as follows:

➤ Birmingham, Coventry, and Black Country City Region:

The City Region falls within the Central Housing Market Area, which over a number of decades has seen a significant trend in the outward migration of the population to the neighbouring shires as well as a decline in the condition of its housing stock. The City Region has significant economic growth potential (in particular Birmingham City Centre, and the Regional assets of Birmingham International Airport, the NEC and regional investment sites in Solihull) and as such can support the urban renaissance agenda of the RSS through increased housing growth and increased economic performance over the duration of the RSS period. As such the revised housing policies contained within Chapter 6 were developed in a way that reflected the housing and economic growth

potential of the City Region, by recognising the need to reverse the trend toward outward migration, to support interventions for housing renewal, to address issues around community cohesion and sustainability and above all the need to focus this growth within the MUAs.

The revised housing policies for the City Region therefore placed significant emphasis on the potential role of Birmingham, Coventry, the Black Country and Telford as a New Growth Point outside the MUA. On the advice of each of the local authorities, future housing numbers were allocated on the basis of their individual long – term growth aspirations. Policies for the phasing of housing land release and the use of brownfield reflected the need to focus on the conurbation in order to support urban renaissance and the growth potential of the City Region. The policies developed to deliver more affordable housing also reflected the need, within the MUAs, to improve housing quality and choice as well as to replace stock lost through clearance and redevelopment.

The future housing provision for those local authorities within the MUA part of the City Region (i.e. Birmingham, Black Country and the MUA part of Solihull) were regarded as minima and would require no Greenbelt land release or urban extensions.

The revised housing policies also reflected Telford's role as a New Growth Point and freestanding settlement and on this basis the town was designated as a Settlement of Significant Development, whereby the majority of Telford and Wrekin's future housing provision would be concentrated in and around Telford.

➤ Coventry and Warwickshire:

Although Coventry sits within the City Region it has strong economic links with both Solihull and Warwickshire and as such sits within the Coventry, Solihull, Warwickshire Sub-region. The role of Coventry is closely linked to the longer –term growth aspirations of the sub-region which aims to encourage and support the economic and growth potential of the North-South Axis of the sub-region running from Nuneaton in the north through Coventry to Leamington/Warwick in the south and is intersected by an East-West Axis running from Rugby to Solihull.

With the exception of Coventry and parts of Solihull, the rest of the sub-region sits outside the MUA. A sub-regional development strategy has been produced for the sub-region by the Coventry, Solihull and Warwickshire (CSW) Forum as the basis of the S4(4) input to the RSS and this aims to focus growth within Coventry and also within the North-South corridor. On this basis the advice received from the Section 4 (4) Authorities requested that additional

housing growth be focused in the key centres – of Coventry, Nuneaton & Bedworth, Warwick/Leamington and Rugby and that growth within North Warwickshire and Stratford on Avon be limited to meeting local needs. In order to achieve this, Warwickshire County Council in consultation with the Warwickshire Districts, advised the Regional Assembly on the future housing provision targets for each of the Warwickshire Districts. This was reflected in the housing distribution established in Table One of the Preferred Option, in addition the revised housing chapter recognised the role of Nuneaton & Bedworth, Warwick/Leamington and Rugby as areas of housing and economic potential as such designated them as Settlements of Significant Development.

➤ **Staffordshire and the North Staffordshire Conurbation:**

This sub-region sits outside the MUA but contains the North Staffordshire conurbation, which alongside the City Region has witnessed a decline in its population and a decline in its housing market. To support the interventions that are being taken forward by the RENEW Housing Market Pathfinder and on the advice of the Section 4 (4) Authorities, a degree of restraint is required across the wider housing market of the conurbation and amongst some adjacent authorities to encourage housing investment and renewal.

As such the revised housing policies have ensured that future housing provision for Stoke on Trent has been phased in such way to support the renewal of the urban core during the early plan period by ensuring that higher housing provision takes place post 2016. In addition, the housing allocations for Newcastle under Lyme reflect the need to focus higher housing growth within the District's urban area to support housing market renewal. On this basis a target was set requiring 80% of the District's allocation to be provided within the urban area. As with the City Region, the revised policies in relation to land phasing and the use of brownfield land have been developed in a way that supports the urban renaissance of the North Staffordshire conurbation by accelerating development within this area and recognising the requirement to develop brownfield sites.

Outside of the North Staffordshire conurbation, the Staffordshire sub-region recognises the need to continue to restrain the outward flow of population from the MUA to areas such as Lichfield, Cannock and Tamworth and this has been reflected in the level of future housing provision for each of the districts. Where as the towns of Burton upon Trent and Stafford have been identified as areas where there is a need to stimulate further regeneration and housing growth potential without any impact upon the MUAs. In the case of Burton it is also recognised that there is a need to restructure parts of its housing market. On this basis, Burton was identified as a New Growth Point and at the time of developing the Preferred Option a submission was put forward for Stafford as

part of the second round of New Growth Points (Stafford has since been designated as a New Growth Point). On this basis and on the advice of the Section 4 (4) Authority, both Burton and Stafford were designated as Settlements of Significant Development whereby the majority of housing provision for each of the Districts would be allocated within Burton and Stafford towns.

➤ **Worcestershire:**

As with parts of Staffordshire, the north of Worcestershire (Redditch, Bromsgrove and Droitwich) has seen rapid residential growth and the outward migration of population from the MUAs. In order to reverse this outward flow each of these areas will accommodate both housing and economic growth in order to meet their own needs.

Within the sub-region, the role of Worcester is recognised as the sub-regional economic centre and is a key development node within the Central Technology Belt and as such will act as the focus for longer term growth across the sub-region. For this reason, Worcester has been designated a New Growth Point and this has been recognised in the revised housing policies with the designation of Worcester as a Settlement of Significant Development. Worcester is unable to accommodate all of its housing growth within its own boundaries and in order to fulfil its role as a key sub-regional centre it will need to extend its development beyond its administrative boundaries into the adjacent authority areas of Wychavon and Malvern Hills. On this basis, the three Districts have produced a joint core strategy which helped to inform the advice from the Section 4 (4) Authority to the Regional Assembly when developing the Preferred Option for Housing and the related policies. The future housing provision allocation for Worcester City acknowledges the need for cross local authority boundary allocations and identifies the level of Worcester's overall allocation to be accommodated in each of the neighbouring districts. It also recognises the need for some small scale adjustments to the Greenbelt surrounding the City.

Outside of Worcester, further development of sub-region will be very much focussed across other larger settlements and market towns; this will include both housing and employment growth. The revised RSS has recognised the role of Redditch (as a former New Town) and the need to accommodate higher housing growth in order to meet its own locally generated needs. Given the scale of development required to meet its own needs Redditch was designated as a Settlement of Significant Development within the revised housing policies. However, on the advice of the Section 4 (4) Authority and the District Council, the RSS housing policies acknowledge that new development with Redditch is restricted due to land constraints and will

therefore Redditch will need to accommodate some of its growth within the adjacent authorities of Bromsgrove and/or Stratford upon Avon. Such development will also have implications for the area of Greenbelt surrounding the District and this was reflected in the housing policies.

➤ Shropshire and Herefordshire – the Rural West:

The two counties of Shropshire and Herefordshire make up the Rural West sub-region and form the West Housing Market Area. The sub-region has two key sub-regional centres of Hereford and Shrewsbury, which act as the administrative and service centres for the wider rural area and will be the focus for both employment and housing growth, including measures to modernise and diversify the local economy in accordance with the West Midlands Economic Strategy. Outside of these two sub-regional centres, the Market Towns act as strategic locations for balanced employment and housing growth within the rural hinterland.

Both Hereford and Shrewsbury have been designated a New Growth Points and for this reason and on the advice of the Section 4(4) Authorities the revised RSS housing policies have designated both areas as Settlements of Significant Development. In the case of each area, the housing policies have recognised that up to half of future housing in Herefordshire will be focussed in and around Hereford and, in the case of Shrewsbury and Atcham, the majority will be focussed in and around Shrewsbury. A key element of this provision will be the requirement for significant infrastructure requirements.

Under the current RSS, policies aim to resist peripheral expansion unless there are certain circumstances where regionally important employment sites support urban renaissance. However to accommodate the additional housing growth identified in the Preferred Option, Section 3.10 (e) was amended to acknowledge that peripheral expansion would generally be resisted unless it could be specifically demonstrated that 'sustainable urban housing extensions supported the urban renaissance of the MUAs and where this is recognised in the amended sub-regional implications section and Chapter 6'.

In addition, it was recognised that in order to accommodate the levels of additional growth required and to meet the growth aspirations of the individual authorities (including the New Growth Point authorities), the revised Strategy acknowledged the need to accommodate some of the growth outside the MUAs. To ensure a more sustainable and balanced approach to future housing provision, the revised RSS replaced the former Sub-regional foci (Worcester, Telford, Shrewsbury, Hereford and Rugby) with Settlements of Significant Development (SSDs) and identified additional settlements (Burton upon Trent, Stafford, Nuneaton and Bedworth, Warwick/Leamington Spa and Redditch) whereby development would

be concentrated in and around settlements in sustainable locations, which would be adequately balanced with employment and relevant infrastructure. The identification of the additional settlements was generally based upon the advice received from the Section 4 (4) Authorities as well as acknowledging the role of these settlements as areas of future housing growth. In the case of Redditch, the town was designated by the RPB as an SSD, given the scale of housing required to meet its needs (i.e. reflecting the population structure of this previous New Town), but recognising that, overall, Worcester would act as a sub-regional focus for longer term growth in Worcestershire. Again, the policy context and implications around SSDs were set out within the sub-regional implications section and in Chapter 6.

Upon completion, the revised Chapter 3 included an updated policy perspective of the individual sub-regions, and set out the inter-relationship between the Spatial Strategy and the Regional Housing Strategy and the revised Regional Economic Strategy (sub section 3.14 – 3.22). In addition, the sub-section (3.9) on the Spatial Strategy Objectives was updated; this included amendments to the Green Belt Objective (d) to include the principle that any adjustment to the Greenbelt boundary would only be allowed where 'exceptional circumstances' can be demonstrated including the requirement 'to allow for the most sustainable form of development to deliver the specific housing proposals referred to within the sub-regional implications of the strategy'.

The sub-regional implications section was drafted by Assembly officers, including its planning, transport and housing advisors, and drew upon the formal advice from Section 4(4) Authorities. This drafting process included close liaison with the Strategic Authorities and also with Advantage West Midlands to highlight, where appropriate, specific links to the emerging RES. The Regional Assembly's RSS Task Group and Regional Advisory Group (RAG) also considered the emerging sub-regional sections.

The revisions to Chapter 3 were presented and discussed at a meeting of the RSS Task Group and RAG in early September, and the RSS Strategic Management Steering Group. At these meetings, it was agreed that the wording in connection with the Green Belt policy and future housing provision needed to be strengthened.

Prior to the RPP meeting on the 24th September 2007, the draft Preferred Option was also presented to a meeting of the Regional Transport Partnership in early September. Members of the Regional Transport Partnership requested that the transport elements of the sub-regional section be strengthened to reflect the transport priorities for those areas where Settlements of Significant Development and New Growth Points have been identified.

Following the comments and suggested amendments, Chapter 3 was revised accordingly and presented at the meeting of the Regional Planning Partnership on the 24th September. At the meeting Members requested that a number of further amendments be made as follows:

- additional text be added to strengthen the inter-relationship of the strategy with the Regional Housing Strategy and the Regional Economic Strategy;
- a new statement on the importance of infrastructure provision within the Delivering and Monitoring section;
- re-wording of the sub-regional section to be undertaken in close liaison with the relevant authorities to reflect updated strategic policy perspectives, in light of the emerging Preferred Option; and
- strengthening of the Green Belt Objective to emphasise the principle that 'exceptional circumstances' needed to be demonstrated.

The draft section was circulated to officers within the Strategic Authorities, AWM and the WMRA's Secretariat requesting that further amendments be made in light of the advice from RPP. It was then finalised and presented to RPP in October 2007 for endorsement.

6.0 Inter-relationship between the Sub-regions and the Sub-Regional Housing Market Areas

6.1 Introduction

At the regional level, the RSS should identify broad locations for new housing developments so that need and demand for housing can be addressed in a way that reflects sustainable development principles. In accordance with PPS3, the broad locations for new housing should take into account; the current and future levels of housing need and demand, the need to focus housing development in sustainable locations and create mixed communities, the need to support Growth Areas, availability and capacity of land and infrastructure and the need to support sub-regional areas where demand is high or where it supports the renewal or replacement of existing stock.

6.2 Inter-relationship with Sub-Regional Housing Market Areas

In line with the requirements of PPS3 and the Housing Green Paper, the Preferred Option was developed around the need to increase the level of housing provision to address issues around housing affordability.

In developing the Preferred Option, consideration was also given to the inter-relationship between the RSS and the RHS, in preparing the sub-regional sections. This recognised the Regional Assembly's role as the Regional Housing Body and established the relationship between the RSS and the RHS and the four sub-regional housing market areas. Prior to the RSS Revision, the RHS had established indicative levels of affordable housing required by each of the four sub-regional housing market areas.

At the time of writing the Preferred Option, there was no comprehensive coverage of Strategic Housing Market Assessments (SHMAs) for each of the four sub-regional housing market areas. In the absence of the SHMAs, WMRA commissioned additional work undertaken by Cambridge University to determine the Housing Need and Demand and Affordable Housing targets for the Region between 2006 – 2026. The outcomes from this research were used to update the Region's affordable housing targets at the Sub-Regional Housing Market level and this informed the affordable housing policies (CF7) contained in Chapter 6.

This analysis provided broad figures for each of the Housing Market areas. The housing policies and context set out in Chapter 6 acknowledged some of the key characteristics of each of the four sub-regional housing market areas (CF3, CF7

and CF8) and acknowledged the need to allocate housing provision at the housing market level. It therefore set the requirement for any policies to be developed at the sub-regional and local level to be informed by sub-regional and local housing market assessments.

Since the submission of the RSS Preferred Option in December 2007, the SHMAs for the sub-regional housing market areas have been completed. In the majority of cases the assessments have provided a more clear indication of the future affordable housing requirements and this has been established at the District level and on an annual basis. In the most cases the level of annual affordable housing need is above the targets set in the Preferred Option. However, although the core brief for each SHMA Assessment was essentially the same, three different consultants undertook the assessments and therefore have not all been presented in exactly the same way. For example C1 and C2, which make up part of the Central HMA, do not present the level of intermediate housing requirements. In addition, the SHMA undertaken for the South HMA commenced prior to the formal publication of the CLG HMA Guidance. However, the Regional Assembly received subsequent confirmation from CLG that provided that the key principles of the guidance were met then there was no requirement to amend the original brief

On this basis the Regional Assembly has therefore commissioned consultants to undertake a review of the SHMAs. This review takes account of the various methodologies used and provides a more comprehensive picture of the West Midlands in terms of housing market needs and requirements. The outcome of this work will provide further information to feed into the RSS EIP.

Within Chapter 3 of the RSS a new section was added which set out the sub-regional implications of the Spatial Strategy. As set out previously, this section was added to the revised RSS to provide a sub-regional context to the RSS and its policies, to acknowledge the role of the RSS in replacing the Structure Plans and, as required by PPS3 and the Housing Green Paper, to acknowledge the understanding of the Region's housing markets in light of the established evidence base which had emerged in developing the RHS.

The geographical definition of the sub-regions in Chapter 3 does not coincide with the boundaries of the four Sub-Regional Housing Market Areas. However there are a number of broad similarities and the sub-regions were based upon a number of factors. In the case of the MUAs this acknowledged the Birmingham, Black Country and Coventry City Region which makes up the majority of the Central Housing Market Area, the Rural West including Shropshire and Herefordshire which makes up the West Sub-regional Housing Market Area, Staffordshire and the North Staffordshire conurbation, which with the exception of Cannock, Lichfield, Tamworth and South Staffordshire makes up the North Housing Market Area.

The main differences are with the South Housing Market Area where the sub-regional strategy section uses the sub-regions of Worcestershire and the Coventry, Warwickshire and Solihull Sub-Region, based on established sub-regional working in these areas. As well as setting out the sub-regional housing market characteristics and geographical boundaries, the sub-regional sections set out the context around the economic function and regeneration priorities for each for the sub-regions. This also established the role of the MUAs, Settlements of Significant Development and other large settlements, in providing a focus for employment and housing growth in line with the RSS principles around urban and rural renaissance.

The sub-regional section also established the context for areas where additional housing growth would be required, where cross boundary allocations for housing distribution would need to be made⁸ and where potential adjustments to Greenbelt boundaries would need to be considered. This then fed into the relevant housing policies in Chapter 6.

In identifying those local authority areas where cross boundary allocations were required this was based on the advice that had been received from the Section 4 (4) Authorities in preparation of the Spatial Options and in developing the Preferred Option for Housing. This included advice in relation to those Districts, which were unable to accommodate higher housing growth within their own local authority boundaries. As set out previously in Section 4.2 this advice related to the following districts:

- Malvern and Wychavon would need to accommodate housing provision in relation to Worcester City;
- In the case of Redditch some of its housing provision would need to be made in the adjoining authorities Bromsgrove and/or Stratford on Avon;
- Birmingham and Bromsgrove in relation to Birmingham;
- Stoke on Trent and Newcastle-under-Lyme in relation to North Staffordshire conurbation;
- The four Black Country Boroughs in relation to Wolverhampton, Walsall, Sandwell and Dudley;
- Stafford and South Staffordshire in relation to Stafford town;
- Cannock Chase, Lichfield and Stafford in relation to Rugeley;
- Tamworth, Lichfield and North Warwickshire in relation to Tamworth and Lichfield Districts;
- East Staffordshire and South Derbyshire in relation to Burton upon Trent;
- Coventry, Nuneaton & Bedworth and Warwick in relation to Coventry.

⁸ See table 4.3 for an explanation of where cross boundary housing allocations will need to be considered.

It was acknowledged that, in some limited cases, the provision of additional housing growth would require the need to make adjustments to Greenbelt boundaries in selected areas, where this would allow for the most sustainable form of development. Again, as with the cross boundary allocations, this was based on the advice of the Section 4 (4) Authorities. Specific advice was received in the Section 4 (4) response to the Spatial Option from the Coventry, Solihull and Warwickshire Forum in relation to additional housing growth within the sub-region and was then subsequently confirmed in discussions with officers of Warwickshire County Council and Coventry City Council in relation to the potential need for greenfield urban extensions within its own boundaries and the potential for Greenbelt development into adjacent authorities (subject to further investigation). The advice received from Worcestershire County Council on the development of the Spatial Options suggested that, in order to accommodate increased housing growth, both Redditch and Worcester City would require peripheral Greenfield land development. This advice was followed up and confirmed in subsequent discussion with Worcester County Council and the Districts in developing the Preferred Option and related policies.

Where the specific need for greenbelt adjustments was identified, this was then set out in the sub-regional implications section in relation to the Coventry, Solihull and Warwickshire sub region and the Worcestershire sub-region. This was subsequently referred to in the Communities for the Future Housing policies (CF3) in Chapter 6. In addition, the supporting text to policies CF1, CF2 and CF3, CF4 acknowledged that there may be a requirement for other districts to adjust their greenbelt boundaries in order to accommodate housing growth.