

Regional Spatial Strategy for the West Midlands Region Phase Two Revision – Examination in Public

Opening Statement by the West Midlands Regional Assembly

Legal Context

1. The West Midlands Regional Assembly (WMRA) is the designated Regional Planning Body for the purposes of the Planning and Compulsory Purchase Act 2004. As such, it has the responsibility for preparing a Regional Spatial Strategy (RSS) for the West Midlands and submitting it to the Minister for public examination. On approval by the Minister, RSS becomes Government and regional policy and part of the statutory development plan.

2. Guidance for RSS preparation is set out by Government in Planning Policy Statement 11 (PPS 11). This confirms that the main principles of the arrangements introduced by the 2004 Act are to deliver policy better at the regional level and to contribute to the culture change necessary to deliver the Government's Sustainable Communities Plan. PPS 11 confirms that Regional Spatial Strategies should:

- contribute to the achievement of sustainable development;
- provide a broad development strategy for 15-20 years;
- provide a spatial development framework to inform the preparation of Local Development Documents (which form the other part of the statutory development plan);
- provide a spatial framework for regional and sub-regional strategies and programmes that have a bearing on land-use activities, including the Regional Housing and Economic Strategies and Local Transport Plans.

History

3. The original RSS for the West Midlands was approved in June 2004. The then Minister supported the overall strategy of Urban and Rural Renaissance. He also identified a number of policy issues requiring further work to develop fully the spatial nature of the document to meet the requirements of the 2004 Act that had been introduced into law the month before. This work was subsequently divided into three phases, each forming a Partial Revision. The second phase of work is the subject of this Examination in Public (EiP).

4. What is before this EiP is therefore a Partial Revision of the original strategy approved by the Minister in June 2004 and confirmed in January 2008 with the incorporation of the Phase 1 Revision policies for the Black Country into the consolidated document. It is not a full Review.

Soundness

5. The Regional Assembly understands that the Panel will use the evidence submitted to this Examination – both written and verbal – to satisfy itself that the RSS Phase 2 Revision is “sound” against the criteria set out in paragraph 2.49 of PPS 11. We reference these 12 criteria (i to xii) in the following sections.

6. We are confident that what we have produced, in close cooperation with our regional partners, is indeed fully sound in the context of that detailed guidance (Para. 2.49 ii and xi). This Revision is based on a detailed and credible evidence base and has clear mechanisms for monitoring and implementation (Para 2.49 vi, viii and xii). The depth and breadth of research publications that we have submitted to the EiP library is demonstration of this.

7. The structure and timetable that the Panel has adopted for this EiP is a suitable framework for testing the consistency of the Phase 2 Revision with national policy and with other relevant regional strategies – particularly housing, transport and economic (Para. 2.49 iii and v). Matters 1 and 2 will properly set the strategy context for the subsequent topic and geographic-based debates. Our evidence will demonstrate bi-lateral cross-boundary co-ordination with other regions to ensure RSS policy compatibility. This is particularly important in the absence of a nation spatial strategy for England. We have also established a formal framework for cross-border policy co-operation with the Welsh Assembly Government.

Sustainability

8. Environmental sustainability issues are not subject to political boundaries. The Panel will recognise the substantial effort we have made to produce a detailed Sustainability Appraisal (Para. 2.49 x) and to supplement the Habitat Regulations Assessment in the light of the concerns expressed at the Technical Seminar on Water Issues held on 18 March 2009 . In an area of legislation of particular technical complexity, we believe our approach bears comparison with that attempted to date by any other English Regional Assembly or by the Welsh Assembly Government.

9. Sustainability is more than just an environmental matter and PPS 11 confirms that a spatial plan such as RSS needs to address “regional economic, environmental and social needs” (Para 2.49 i). Urban and Rural Renaissance are the twin concepts that underpin the regional strategy approved by the Minister in 2004 and again in 2008. The wording of these policies (UR1 and RR1) make clear that co-ordinated action is needed to tackle environmental, social and economic issues alike if the strategy is to be successfully implemented.

10. We ask the Panel to pay particular attention to the impact on Urban and Rural Renaissance when assessing alternative policy and growth proposals promoted by other EiP participants, particularly those that seek additional housing provision on green field sites. It is the Assembly’s firm submission that continued large scale migration from the

major urban areas will create social, environmental and economic harm to the region as a whole and the MUAs in particular. The region's previous overspill policies of the post war era that sought to encourage and manage this process of outmigration are no longer fit for purpose and the Minister's twice confirmed RSS strategy is the correct policy stance that we seek to update and continue.

Flexibility and Economic Circumstances

11. The EiP will rightly address the implications for RSS of the current economic circumstances. The Panel will need to satisfy itself that the Draft Revision is indeed "robust and able to deal with changing circumstances" (Para 2.49 ix). In so doing, the Panel will appreciate that this is a twenty year strategy. Policies are needed to manage the inevitable variations in development pressures over that entire period to 2026, during which, no doubt, other economic cycles will be experienced. We will argue that today's challenges remain the same as those that faced the Region in 2004 when the Minister first approved the EiP Strategy. These challenges are deep-seated and can only be addressed by a long term policy-led approach and its effective implementation.

12. The Regional Assembly will therefore emphasise the need for phasing and the managed release of land as the proper responses to changing economic circumstances. This is the policy-led approach to "flexibility" which we commend to the Panel rather than the abandonment of the strategy as a short term fix that may be advocated by others. Once land has been allocated and developed, it is very difficult to reverse the process. The Preferred Option, on the other hand, can be amended through future policy revisions or reviews, should the annual monitoring process demonstrate under-provision. To quote Professor Michael Parkinson in his recent report to Government on the impact of the credit crunch on regeneration: "*the principles which are good in good times are even better in bad times*". (*)

13. Proposals by others for additional development will cite the need for flexibility; but it is the duty of a regional strategy to provide a consistent policy framework against which individual proposals can be measured for their cumulative impact. In the current economic situation, flexibility may be sought for alternative forms of development that can happen in the short term, regardless of longer term needs. Housing is a key element in creating sustainable communities, but housing provision cannot do so alone without the full range of social, environmental and economic issues being addressed as well. Economic recovery will, in particular, need a suitable supply of employment land and town centre commercial sites and these must not be lost in a rush for short-term development gain.

(*) "*The Credit Crunch and Regeneration: Impact and Implications*" – an independent report commissioned by Communities and Local Government, January 2009, from Professor Michael Parkinson, Liverpool John Moores University with Professor Michael Ball, Dr. Neil Blake and Professor Tony Kay.

Housing

14. The Examination's focus on housing is understood, given an historic shortage of housing in the region and the Government's focus on increasing housing delivery across England. The Assembly asks the Panel to use Matters 3 and 4 to satisfy itself on all aspects of housing – location, deliverability, affordability and need – and not solely on the headline total numbers. The housing market has already failed in two parts of the region where low demand pathfinder organisations have been created in response. There, existing homes have been lying empty because they do not meet the local communities' needs. Unless the Draft Revision gets the total package of housing policies right, we risk again building the wrong houses in the wrong place.

Certainty

15. The Panel may hear suggestions for re-shaping the Draft Revision, for example, by shifting its focus from the MUA's towards greater green field development, or preparing straight away for a move to the proposed Single Regional Strategy. The Assembly asks the Panel to resist these suggestions and recommend to the Minister a speedy completion of the Revision process. The Preferred Option is the most fully developed strategy for growth before the Panel; and it therefore represents the best chance of early and successful implementation. A firm regional policy framework is needed as soon as possible both to guide the region out of recession and to provide certainty for Local Development Frameworks. Any alternative approach available is only likely to delay providing that certainty, particularly as the needs of Habitats Regulations Assessment are met afresh.

Sub Regions

16. The West Midlands comprises a set of distinctive sub-regions and we welcome the Panel's willingness to devote 15 EiP sessions to sub-regional debates. The Regional Assembly's case in those sessions will be led by the appropriate planning authorities to ensure the Panel has the full range of sub-regional knowledge at its disposal. The challenge for all participants in those sessions will be to retain the strategic and regional focus in these debates. It would be wrong to be drawn into matters of site specificity which are rightly the focus of Local Development Frameworks. It will sometimes be difficult to draw the line in these debates, but we know the Panel appreciates the importance of so doing.

Deliverability

17. The Regional Assembly and its partners have all demonstrated by our submissions and by our willingness to contribute in person to this EiP that we are committed to delivering the Draft Revision. We recognise that it is ambitious – particularly in existing economic circumstances – and that it represents, for example, a 50% increase in housing growth over existing RPG 11 targets. This “coalition of the willing” to deliver development that we have assembled has overcome traditional antipathy to growth that

previously existed in many parts of the Region. We ask the Panel to recognise in their report to the Minister that the Draft Revision is well-researched and well-supported and represents the optimum chance of meeting the region's needs in a sustainable way.

Conclusions

18. In closing, I thank the Panel in advance for the professionalism, patience and courtesy that I know they will exercise throughout the proceedings and I offer the following conclusions as reference points for all participants in the EiP:

- This is a Partial Revision of the existing RSS, not a full Review.
- The RSS Strategy underpinning it has been twice approved by Ministers.
- Urban and Rural Renaissance are the twin pillars of the Strategy
- The proposed Revision represents the best chance of addressing sustainability and climate change
- Current economic circumstances have amplified the challenges facing the region, but they are still the same challenges that existed when the Strategy was first approved
- A response to current economic circumstances requires a policy-led approach to “flexibility”, not the abandonment of the Strategy as a short term fix
- Housing is more than crude numbers – it is about location, deliverability, affordability and need
- “Certainty” will best be delivered by an early Ministerial decision on the Preferred Option, which is the most fully-developed strategy before the Panel
- The Regional Assembly and its partners are committed to delivering the Preferred Option to meet the Region's needs.

19. The Regional Assembly looks forward to demonstrating the validity of these conclusions to the Panel's satisfaction.

Mark Middleton
Director of Policy
West Midlands Regional Assembly
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