

Baroness Andrews
Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU

31st January 2008

Dear Baroness Andrews

West Midlands Regional Spatial Strategy: Phase Two Revision Draft

You wrote to the Regional Assembly on 7th January 2008 setting out the Government's intention to commission further work to consider options for delivering higher housing numbers within the WMRSS Phase Two Revision.

You will recall that, in my initial response of 21st January 2008, I expressed my disappointment in the approach being taken by Government on this issue. However, I gave my assurance that the contents of your letter would be carefully considered by the meeting of the Regional Planning Partnership (RPP) on 25th January 2008. Following that meeting, this letter represents the formal response of the Regional Planning Body (RPB) to your proposals.

First, I wish to reiterate the concern set out in my earlier letter that, over the past 18 months, the RPB has worked hard with its partners to develop a package of housing proposals which it believes represents an ambitious and sustainable growth strategy for the Region. This balances the need to provide for significantly higher levels of housing provision whilst maintaining the spatial strategy and the implementation of the Urban and Rural Renaissance agendas. This overall approach has been widely supported by stakeholders from across all parts of the Region

Against this background of regional consensus, Members of the RPP expressed considerable concern and disappointment at the Government's intervention. In particular, concern was expressed towards the implied intention that certain of the underlying principles of the RSS could potentially be open to question. It was considered that this could lead to the fundamental aims of Urban and Rural Renaissance being prejudiced, to the extent that 'the RSS would cease to be the RSS' with major economic, social and environmental implications.

Despite these serious reservations, it was nevertheless agreed that the RPB should constructively engage with the proposed Study, to ensure that its views and expertise are fully taken into account. However, in adopting this stance, it is important to stress that such engagement should not be interpreted as an endorsement of the need for the study, any methodology adopted or, indeed, agreement to any subsequent output that might be generated. Whilst co-operating where appropriate on the provision of background evidence (i.e. that supporting the WMRSS Phase Two Revision), the RPB will clearly wish to reserve its position until such time as the Study is completed. It is at this stage where it will determine its view as an input to the Examination in Public and, as such, will expect the Study, as with all other evidence and views, to be independently assessed and 'tested'.

The RPB welcomes your intention to undertake the Study in an open and inclusive way involving regional stakeholders. In this regard, the RPB feels engagement should be undertaken as early as possible and that GOWM should share the proposed brief and consequent methodology widely at the earliest opportunity. Until this is achieved, there will undoubtedly be much uncertainty and related speculation creating particular difficulties for the RPB.

In agreeing to co-operate with the on-going process, it is important for you to be aware of some of the detailed concerns that were raised at the RPP meeting. These are views that the RPB would expect to be fully taken into account in the Study:

- a. It is acknowledged that consultants appointed will clearly be working to a Government brief but, in line with normal planning procedures, any Sustainability Appraisal of potential options should be undertaken independently;
- b. It is important to recognise that there are already major concerns relating to the provision of supporting infrastructure; these demands are likely to be exacerbated if higher housing provision is contemplated with inevitable consequences for substantial additional public funding;
- c. It is crucial that, in identifying potential options, the Study examines the consequences for ALL policy areas including homes, jobs and transport and other services;
- d. There is a critical need to consider how further social and affordable housing can be provided rather than merely adopting a simple numbers based approach to further options that looks at overall affordability ;
- e. There is an urgent need to provide further clarification on any proposals for Ecotowns, given the current level of public confusion on this issue and how they relate to current WMRSS Phase Two proposals;
- f. There is a need to recognise the potential impact of new housing provision upon the housing market renewal intervention areas across the Region's Major Urban Areas; and
- g. There will be a need to make the proposed methodology and any associated new evidence collected with partners (e.g. Housing

Market Areas Partnerships) publicly available as soon as is practical so that others can effectively engage with the process.

Further to this, your letter recommends extending the WMRSS Phase Two Revision consultation period until 23rd May 2008, to provide an opportunity for consultees to consider the 'additional evidence' that is to be provided by the Study. We also understand from the GOWM that, if the proposal is to be adopted, it is the responsibility of the RPB to agree and implement this.

Given this situation, this matter has been carefully considered by the RPB where Members raised considerable concern as to the need to ensure adequate time for stakeholders to be properly consulted. In the case of local authorities, it was recognised that there could be particular difficulties given the timing of the May local elections and the associated 'purdah' period. In these circumstances, it was agreed that a more appropriate way forward, which would allow consultees reasonable time to assess the Study, would be to extend the consultation period to 30th June. This timescale would still allow the EiP to commence before the end of 2008.

Accordingly, we would recommend this amended date to you and, if you find this acceptable, it is hoped that this will be confirmed as soon as possible. This will be important so that, to avoid confusion, the RPB can quickly inform consultees of the extension to the consultation period. Equally, it is hoped that PINS can then establish a start date for the EiP to enable the RPB to firm up the management of its on-going working arrangements, including any implications for the WMRSS Phase Three Revision process.

Finally, I hope you will acknowledge that, despite the RPB's serious reservations, it is prepared to co-operate constructively with the proposed Study as an input to the EiP. However, it is sincerely hoped that the Government has not already made up its mind on this very important issue and will await the advice of the Examination Panel, and indeed the input of the RPB's views to it, before it does so.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rex Roberts', with a long horizontal flourish extending to the right.

Cllr Rex Roberts
Chairman – Regional Planning Partnership
West Midlands Regional Assembly