

**West Midlands Regional Spatial Strategy**  
**Phase Two Revision – Spatial Options**  
**Analysis and Review of Consultation Responses, May 2007**

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**Addendum to the report to reflect the consultation response received from  
RPS Planning and Development**

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**Background**

It has been brought to WMRA's attention that the consultation response to the Spatial Options consultation made by RPS Planning and Development is not included in the consultation report. The following steps have been taken to address this and to ensure that the response is taken into account in the process of developing the Preferred Option:-

1. The WMRA Secretariat has analysed the consultation response. In this particular case it should be noted that in addition to RPS Planning and Development's own response, a number of responses were received from RPS Planning and Development on behalf of various clients – all of which were analysed and summarised in the consultation report. RPS Planning and Development's own response was compared to those other responses submitted by RPS Planning and Development. In those cases in which RPS Planning and Development's own response is identical to other responses submitted by RPS Planning and Development on behalf of clients, the relevant text from the consultation report is reproduced below. In addition those sections which are unique to RPS Planning and Development's own response are reproduced.
2. The analysis of RPS Planning and Development's response is included in this addendum to the consultation report (see below).
3. This addendum and RPS Planning and Development's full response have been forwarded to the RSS Policy Leads who have been asked to take these documents into account in the process of developing the Preferred Option together with the consultation report and other relevant considerations.
4. This addendum has been forwarded to RPS Planning and Development for information.
5. The addendum has been made available on the WMRA website along with the consultation report.
6. The WMRA Regional Planning Partnership has been informed about the addendum to the consultation report.

## **Analysis of the response**

### **Housing**

#### ***Question H1-1***

Response: No.

Comments: See H2.

#### ***Question H1-2***

Response: No.

Comments: See H2.

#### ***Question H1-3***

Response: Yes.

Comments: See H2.

#### ***Question H2***

Comments: Options 1 and 2 are not supported by any objective or credible evidence base, contrary to PPS3 (paragraph 32). They fail to plan for an appropriate level of housing growth in terms of demographic or social trends, or in terms of other determinants of housing demand. Option 1 uses outdated 1996 household projections, with current building rates in excess of this level, yet still failing to meet housing need and demand in the Region. Option 2 is based mainly on the aspirations of relevant local authorities, without the widespread input required from interested stakeholders. The housing capacity work undertaken was seriously flawed and did not follow a recognise methodology. Option 1 and 2 therefore fail to meet the requirements of PPS3 and represent an un-sound approach to defining regional housing requirements. Only Option 3 complies generally with national planning advice, in using the latest (2003-based) household projections, which contains the most recent and reliable evidence on demographic and household trends. As such, Option 3 provides the only credible basis for establishing the regional housing requirements and represents the starting point to address the Government's primary housing objective, that everyone should have the opportunity of a decent home. Such an approach will form an effective basis for providing the required levels of market and affordable housing across the West Midlands Region over the next 20 years, an approach advocated in PPS3. Using the latest household projections to determine the levels of housing provision is therefore advocated. However, despite the use of these projections, there are several criticisms relating to the specific methodology employed by the RPB. The criticisms of the approach taken are outlined below, but essentially relate to the lack of any alignment with the West Midlands Economic Strategy (WMES) and specific elements of the household projections and delivery assumptions. Whilst 2003 household projection represent an appropriate starting point through continuation of recent demographic trends, they do not take account of the impact of the regional economic transformation agenda and aspirations on population levels and subsequent household growth. It is vital to ensure that housing provision (in terms of numbers, location and quality) meets the needs of the Region's economy and labour force. Whilst Option 3 housing levels

appropriately seeks to reflect housing demand, it falls short of the levels of provision needed to support forecast growth and policy aspirations for increased economic success. In the West Midlands Economic growth objectives are to be achieved, then the current pessimistic WMRSS housing figures must be reworked, to allow for the future growth of the Region. The current 2003 household projections are based on the 2003 population projections. However, in October 2006 the Office for National Statistics released the 2004 based sub national population projections for England up to 2029. Whilst these population projections have not, as yet, been turned into housing projections, they do provide the most up-to-dated information available to the RPB and it is therefore essential, such information is used. Concern is raised over the accuracy of the housing demand figures supplied in the WMRSS Spatial Options and further detailed within the WMRSS Housing Background Paper. Whilst it is accepted that these demolition levels have been established on the basis of the information supplied by the relevant local authorities, there is genuine concern over the reliability and compability of the data provided. Whilst it is important for housing land management purposes to effectively monitor both net and gross dwellings, only net dwellings actually represent additions to the housing stock. For this reason it is essential that demolitions levels are accurately projected by the RPB and effectively monitored by both the RPB and LPAs. Concern is also expressed over the reliability and suitability of sources of 'urban capacity'. Whilst it is acknowledged that estimates of capacity will fluctuate, the discrepancies indicate a concern over the reliability of data supply, with limited evidence of an adequate audit check or transparency in the process.

### ***Question H3-1***

Comments: No credible evidence base to use this Option.

### ***Question H3-2***

Comments: No credible evidence base to use this Option.

### ***Question H3-3***

Comments: All three options represent a significant shift in emphasis in the balance of housing towards the MUAs when compared with the pre 2001 rates. Given the recent changes in national housing policy and the need to address market demand, the appropriateness of such a radical change must now be challenged. Whilst the principal of urban renaissance of the MUAs is still a logical and accepted one, given the scale of the housing requirements now facing the West Midlands Region, continuing the 'step change' in such a dominant way would represent an unrealistic and unachievable stance. Whilst the distribution of housing must not undermine the Urban Renaissance agenda for the MUAs, the overall balance of housing in Option 3 is still disproportionate and should more closely reflect the available capacity of housing land environmental consequences of such significant development levels within the MUAs. Given considerable uncertainties over both the accuracy and realism of the RUCS, a re-distribution is required in favour of the 'other areas' to ensure the overall regional requirements are fulfilled. The strategy of the WMRSS requires adjustment to ensure the balance of housing development allows for a greater proportion of development within the 'other areas' to ensure the overall regional housing requirements are fulfilled.

### **Question H4-3**

Response: Yes.

Comments: Whilst there are potentially some skills shortages within specific areas of the construction industry (particularly on the project management side) provided there is sufficient market certainty over the level and timeframes for house building, the construction industry has sufficient capacity and flexibility to deliver the quantity of housing required. Based on the research and the forecasts, the clear conclusion was that the UK construction industry is not expected to face significant capacity constraints to 2015. There will be a need more specific training requirements for construction trades and professionals. Of greater importance to the construction industry is the lack of availability of land with planning permission.

### **Question H5**

Comments: Delivering the appropriate scale of housing growth will depend on having a spatial strategy that is sufficiently flexible, yet robust enough to accommodate the many uncertainties that will inevitably be forthcoming on planning in twenty year spatial vision for housing growth across a diverse region such as the West Midlands. The problem of delivery is therefore mainly one of identifying too few strategic spatial options and concentrating on an approach which is driven by a strategy of delivering urban renaissance as the primary objective, without full regard to other important objectives. The solution is to encourage a much wider range of development options to be considered within Local Development Frameworks and appropriate housing trajectory policies.

### **Question H6**

Comments: Given the nature of Government's national housing agenda and the significantly increased need for housing provision across the Region, it is suggested that the whole approach of the WMRSS should be reconsidered, with a genuine range of strategy options proposed. The changes to the strategy for delivery of regional housing now required through the WMRSS are of such a scale and significance that the current Spatial Options document should not offer Options 1 and 2 as credible ways of delivering the vision for the region which must include the delivery of sufficient new decent homes for the population. For the reason stated under question H2, Option 1 and 2 should be rejected, without giving detailed consideration to the spatial distribution of housing within them. There exists a genuine concern over the lack of any robust, auditable, and transparent approach to the overall distribution of housing to individual local authorities in the Region. The distribution has principally been undertaken on the basis of the claimed regional urban capacity and the 'aspirations' of the strategic planning authorities. This has led to a distribution in Option 3 which lacks any overarching or joined up approach and merely seeks to provide for 'what it can' within the MUAs and distribute the remainder across the region, largely (although not exclusively) focused on sub-regional foci. The proposed distribution is focused too heavily upon unrealistic assumptions over the capacity of the MUAs, without allowing for a wider portfolio of development opportunities. The RPB must create a policy framework that is more flexible and less prescriptive, rather than seeking to provide a generic distribution of housing. Market responsiveness is central to this and can only be achieved if the house building industry has sufficient flexibility to respond quickly to market demand.

## **Question H7**

Comments:

### **South Staffordshire**

Options 1, 2 and 3 consistently propose only 5,000 dwellings in South Staffordshire. RPS observes that this is perverse. South Staffordshire has very significant affordable housing requirements. The area will de facto accommodate households that wish to move to the area to the existing housing stock if not into new homes. This will fuel local house price inflation and worsen affordability. Therefore, the current strategy is sustaining a vicious circle that is creating social division. A better strategy is to seek higher proportions of affordable housing within a higher overall level of allocation.

RPS supports a spatial strategy that allows the following:

- Limited dispersal of housing growth to the more sustainable locations within the District including Cheslyn Hay, Essington, Featherstone and Penkridge: mixed tenure development meeting local needs (affordable and general market) and limited migrant households;
- Selective mixed use urban extension of the Black Country, for example at Black Halve Lane north of Wolverhampton where no coalescence issue arises. The capacity exists there to accommodate a mixed use extension including mixed tenure housing, local employment and a local centre providing retail, leisure, education and cultural activities;
- Regionally significant employment opportunities for the northern Black Country and southern Staffordshire area associated with the High Technology Corridor and the recent and planned new investment in strategic roads associated with the M6 Toll, M6 improvements and the M54 to M6/M6 Toll link road. These opportunities include i54 at Wobaston Road (as proposed by AWM) and the opportunity identified by RPS at M6 Junction 11. In both cases there are Green Belt implications that need to be addressed. J11 is extremely well placed to serve the wider sub-region;
- Where necessary, selective Green Belt boundary review to accommodate required development.

The emerging RSS should respond positively to the opportunities for sustainable levels of housing and employment growth in South Staffordshire that recognises the inter-relationship that exists with the Black Country. This approach does not undermine the renaissance of the Black Country. It complements it. The capacity does not exist within the four Black Country Boroughs to provide the necessary new housing (net) and maintain employment levels. The strategy must allow for some limited mixed use urban extension of the Black Country, some housing overspill requiring limited urban extensions to the key settlements and, as already accepted, strategic employment land.

### **Cannock**

RPS supports Cannock Chase District Council's concerns that none of the Spatial Options offered for housing growth between 2001 and 2026 meet the requirements of the District. The suggested levels of only 6,000 or 7,000 dwellings fall far short of the

Council's assessment of local needs, such that the Council has identified 8,500 dwellings as a preferred option.

The capacity of the District includes limited urban capacity but does include significant areas of safeguarded land for "post 2001" development in the saved Local Plan which is capable of delivering phased mixed tenure residential development over the period from 2009 to 2026. Land west of Pye Green Road, Cannock is a particularly sustainable option on the 10 minute 2 way frequency bus route between Cannock and Hednesford Town Centres. This site alone has the capacity for some 1,550 dwellings.

The overall capacity without the need to review the Green belt boundary or threaten the Cannock Chase AONB is in excess of 9,500 dwellings over the period of the RSS Revision to 2026.

Given the constraints in the MUAs, the rail links that exist from Cannock and Hednesford and the excellent high frequency internal bus links within the Cannock urban area, Cannock Chase is entirely suitable location for additional development growth to meet the increased housing requirement above the Option 3 level. A revised requirement of at least **9,500 dwellings net** is sought.

### **Droitwich**

Within Wychavon in Worcestershire, there is capacity to the south of Droitwich for sustainable development within the Central Technology Belt in respect of strategic employment opportunities with rail access potential at the Copcut Area of Development Restraint to the west of the A38 and further residential development in the Yew Tree Bowl on land excluded from the Green Belt to the north of Newland Road. There is a further small ADR adjacent to the motorway.

Droitwich has excellent basic infrastructure capable of serving further development. There is a need for a new primary/first school in the south of the town that can be facilitated by new housing development. The town is a recognised Other Large Settlement where modest growth can be accommodated sustainably. The town represents a much more sustainable option than Wychbold or Hartlebury where other ADRs were allocated in the Wychavon District Local Plan in the 1990's and carried forward in the current saved Plan.

### **Redditch**

RPS considers that the former Redditch New Town should continue to be a location that both seeks to accommodate growth generated locally by the young demography which has high household formation rates and also a proportion of Birmingham's needs that evidently, even under Option 3, cannot be met within the City's boundary. There is an electrified railway service into Birmingham, where new investment should be considered to increase frequencies and capacity of services.

Option 3 is strongly supported as this recognises the potential that exists at Redditch to accommodate further growth sustainably. There will need to be a cross-boundary study to identify land to meet the full requirement. However, early progress towards increasing building should be encouraged by the RSS having regard to the recognised capacity of the Brockhill ADR to the north of the town for which the early work on the Borough Council's North West Redditch Masterplan identified the suitability of the area to accommodate 450 dwellings associated with new employment.

Ironically, the employment land was allocated but the housing was omitted due to an interpretation of national planning policy that planning should be short term and that 'provision for' housing is a test of policy implementation rather than 'actual delivery' of new homes in which households can live. The result has been a farcical moratorium policy on the basis that planning permissions and allocations exist, rather than a 'plan, monitor and manage' approach to ensure housing will continue to be delivered through a reserve of identified allocations that can be held back or more likely advanced to meet the impending substantial increase in housing requirements through to 2026.

The problem has been compounded further by the application of a moratorium in circumstances where the new increased annual requirements are actually back-dated to 2001. Accordingly, the moratorium linked to lead-times associated with bringing forward the strategic sites that will be required will mean that the actual new building rates that will be required will be substantially higher again over the remainder of the Plan period to 2026 to redress the shortfall over the period from 2001 until the new strategic housing sites come on stream. This justifies a clear directive from WMRA and GOWM that Redditch and other growth points must start releasing key new allocations early through development briefs and interim policy documents to deliver the spatial strategy effectively.

A cross-boundary study needs to be instituted immediately for a second wave of strategic sites. The opportunity at Brockhill West, in Bromsgrove District has been identified by the Section 4(4) Authority as having potential. As described in other statements, RPS (formerly MRP) has sought ADR status for this land in the Bromsgrove District Local Plan. Although unsuccessful in this objective, the Inspector did conclude that the area was both sustainable and less significant in Green Belt function terms and that the issue of Redditch's future growth was properly a matter for the Region Plan review. Access routes into this area are already in place.

## **Rugby**

RPS supports the continued recognition of Rugby as a Sub-Regional Focus. In a similar way to Redditch it is most unfortunate that the saved Local Plan has taken such a short-sighted approach to planning for housing delivery. It is accepted that the Inspector's binding report in that case caused the change to reduce the reserve supply of housing land rather than the Local Planning Authority which recognised the expected increase in housing growth that would be required by the RSS revision and desired to have identified housing land in place.

Coton, to the north of the town, has become established as a new district within the urban area. It has a substantial employment base and has the infrastructure capacity to accommodate planned expansions to the east, and also to the west across the A426 Leicester Road.

These are readily available and developable areas where park and ride and high frequency bus services can be provided to maximise integration with the town centre.

This offers a much better pattern of urban development than a potential new settlement on the radio masts area east of the town that would have poor connections because of the barrier of the railway line and which would require a district centre that would compete with rather than complement the town centre.

The radio masts area is a cross-boundary location which would require support from the East Midlands RSS given the implications of what RPS understands is being proposed (a substantial new town in its own right). The radio masts land is not

previously developed land as may have been contended. It has been actively farmed through out its existence as a radio mast operation. It continues to have an agricultural land quality classification. Clearly, there is extensive underground 'circuitry', but the dismantling of the masts would return the land to open farmland.

### **Question H9**

Response: Yes.

Comments: Whilst the Spatial Options document mentions the existing sub-regional foci, it is largely silent over the precise nature of their role within the sub-region and adds nothing to the limited explanation of Policy CF2. At present it is unclear whether these settlements have been defined as sub-regional foci, merely to act as development growth points, or whether they have been defined due to their strategic importance with the surrounding geographical area.

Whilst recognising the need for greater clarity over their function and status, sub-regional foci do have a vital role to play in ensuring the development of self-contained sustainable communities. Whilst the concept of developing the sub regional foci is supported, there needs to be careful consideration of the potential capacity of these centres in order to ensure the delivery/deliverability of sustainable communities in the period of the Revision, i.e.20026. The scale of provision at these foci is expected to require substantial infrastructure provision and appropriate phasing, through the LDF process via housing policies founded on a robust housing trajectory.

In light of the significant land requirements at the sub-regional foci and the need to protect areas of high 'public' value and land with critical constraints (such as sites with important or endangered wildlife or areas at risk from flooding), the WMRSS review must allow for consideration of all expansion opportunities including Green Belt reviews, cross boundary development and urban extensions.

Greenfield expansion of Rugby will be required wherever growth is accommodated. The radio mast site is Greenfield and would represent a new settlement/town that is likely to compete with, rather than complement Rugby Town Centre. The opportunities to the north of the town at Coton represent an extension of an unfinished urban district of the town which can be integrated very effectively with the town.

### **Question H10**

Comments: In accordance with PPS3 (paragraph 28) the WMRSS should set out the regional approach to addressing affordable housing needs, including an overall affordable housing target for region and each housing market area. Such a policy should however, only act as a guide for individual Local Planning Authorities across the Region, base upon Strategic Housing Market Assessments and should not seek to define market/social split for the West Midlands, simply drawing attention to the need for local authorities to address this important issue in local strategies.

Whilst it is appropriate for the WMRSS to indicate an overall affordable housing target, this must be set at a realistic level, having regard to regional housing needs and market surveys. Such a policy must have sufficient flexibility built into it so as not to impede housing development, without due consideration being given to individual site-specific circumstances, including size and abnormal costs.

### **Question H11**

Comments: The setting of individual District level affordable housing targets within the WMRSS would be contrary to the clear and recent guidance within the PPS3, that Regional Spatial Strategies should only focus on the regional approach to affordable housing needs and targets and leave the District level targets to individual Local Planning Authorities.

Target set by Local Planning Authorities as advised in PPS3 should reflect an assessment of prices/rents and incomes and the financial economic viability of alternative levels of provision in the local housing markets. The use of minima targets are inappropriate at either the local or regional level.

There is also concern that an overall regional target might well, in practice, lead to excessive demands or requirements on housing development, particularly if the overall achievement of the target was not being met.

### **Question H12**

Comments: Delivery of more affordable housing depends on providing sufficient housing overall to improve the affordability of housing generally, as well as the provision of subsidised housing. By ensuring that housing levels reflect demand, through utilising housing Option 3 as a baseline, will also improve affordability by limiting price increases.

### **Question H13**

Comments: Evidence of affordability levels is most appropriately based upon robust analysis centred upon the four sub-regional housing markets as defined by the Regional Housing Strategy. By limiting the question to affordable houses with subsidy, the question is misleading. Does the question mean "public subsidy". If so, this source, only represents a proportion of the potential affordable houses and does not include other sources of affordable housing supply, for example those obtained as a result of Section 106 agreements without public subsidy.

### **Question H14**

Response: No.

Comments: The WMRSS should not be seeking to define specific geographical areas within the region where thresholds should be lowered. As advised in PPS3: It is the role and function of individual Local Planning Authorities to establish (and justify) if there is a case for lowering the site threshold below the national minimum level of 15 dwellings.

There are many examples within the West Midlands Region, where site thresholds below 15 dwellings have already been set. Such lower thresholds have been established following locally based Housing Needs Assessments and publicly tested through an independent Public Inquiry process. It would therefore be both inappropriate and erroneous for the Regional Assembly to attempt to include such localised thresholds within the WMRSS.

**Question H15**

Evidence: As a general comment, it should not be the role of the WMRSS to address specific housing mixes across the region. This should be left to the individual Local Planning Authority and developer to address in light of specific locational and market requirements. Such a local assessment can most appropriately be informed having regard to local evidence base information, including local housing market assessments and policy requirement of Local Development.

**Question H16**

Response: Yes.

Comments: It should not be a question of whether Options Two and Three would release land earlier than the WMRSS, but whether housing provision reflects current regional demand in the form of the latest household projections and can be delivered in a manner which is consistent with the overall spatial strategy. Provided that appropriate housing trajectory policies (including realistic phasing requirements) are included within individual Local Planning Authorities Local Development Documents, the plan, monitor, manage approach to housing provision will ensure the necessary safeguards to deliver housing sites in the most appropriate manner.

Given the implications for certain sub-regional foci and other settlements, of Option Two and Three, it is important that the WMRSS provides clear and positive advice to individual Local Planning Authorities regarding the need for scenario and contingency planning. The delivery of additional housing across the Region is paramount. Continuity of house-building is an important consideration. It is entirely unhelpful to ask the construction industry to 'close down' in an area for a period of years when it is known that rapid acceleration of building will be needed in a relatively short period. It is far better to avoid extreme fluctuations of building activity.

**Question H17**

Response: Yes.

Comments: The Government key objective is to address any shortfalls in the supply of market housing. The application of maxima housing targets for areas outside the MUAs runs counter to this objective and as stated in PPS3 would not allow individual Local Planning Authorities to provide for the full range of market housing within their Local Development Document.

This approach has recently been acknowledged and reflected in the East of England RSS Proposed Modifications Report. Within the December 2006 Proposed Changes Consultation and accompanying letter by Men Munn MP (Parliamentary Under Secretary), the Secretary of State proposes (paragraph 5.5) that for housing "targets for individual authorities should be regarded as minima which Local Planning Authorities should seek to exceed if more can be delivered through Brownfield capacity and , where appropriate, increased densities." This approach provides compelling and up to date evidence of why the use of maxima housing targets (within the WMRSS) for areas outside the MUAs is completely inappropriate given the Government's housing growth agenda and the need to deliver housing demand.

In order to ensure that the overall WMRSS Strategy is not undermined, it is considered that a more flexible solution should be the use of 'about' targets for areas beyond the MUAs.

**Question H18**

Response: Yes.

Comments: The use of minima targets within the MUA is appropriate, ensuring that housing demand can be catered for, and will assist in focusing development opportunities towards previously developed land. However, it is important that those minima levels are both realistic and deliverable. As stated above, there exists genuine concern that the levels of housing development attributed to the MUAs in spatial Options Two and, particularly, Option Three cannot be achieved. Provision above realistic minima will be aspirational.

**General Comments (Housing)**

The Region is facing a serious demographic challenge, with the working-age population projected to shrink and demand for employment expected to outgrow supply. The Spatial Options document and in particular the housing proposals fail to address or even acknowledge this issue. Whilst it is accepted that in terms of the sequential approach to site selection, local authorities should consider the capacity of Brownfield sites first, this should be based upon a realistic assessment and should take account of their location in sustainability terms. Whilst it will be important to achieve efficient use of Brownfield land, the distribution of housing should not be unduly influenced by Brownfield targets.

<b>Employment</b>
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**Question E1**

Response: Yes.

Comments: Employment land is a central component of the WMRSS, it is therefore important that future employment land requirements are quantified within the WMRSS. As important is a systematic and transparent approach to the calculation of the amount and type of employment land required over the plan period. It is essential for the regional economy that a single agreed methodology is used at the regional level which reflects the needs of business and provides a direct alignment with housing provision at the regional and sub-regional levels. Importantly such requirements must be based upon net employment provision and monitoring at Local Planning Authority level undertaken to take account of losses of employment land.

**Question E2**

Response: District level.

Comments: Employment land provision should be broken down to individual district levels. With the abolition of Structure Plans, there would be no merit in providing

employment figures purely at the Strategic Authority level, there being no ability or formal mechanism in place to re-distribute the figures to the constituent

**Question E3**

Response: No.

Comments: There is concern that using a reservoir principle is too simplistic a method to quantifying employment land requirements and a more suitable approach would be to include a specific employment target for each Local Planning Authority, based on overall employment land requirements and available labour supply. The adoption of this approach would relate to projected requirements and enable a clear choice of employment locations to be provided, base on a range of sites in terms their size and quality. Maintaining a minimum target does not unduly restrict available employment opportunities and provides certainty and continuity in the supply of new employment land to the market.

Concern exists that basing future employment land requirements purely on historical completion records (dating back to 1995) merely reflects the historical policy approach and economic climate that prevailed previously and bears no resemblance to or anticipation of the property market requirements, including site availability and developer interest. Care must also be taken using trend based projections based upon historical take up rates, which may reflect possible distortions arising from particular historical factors limiting of advancing employment land provision.

Use of employment targets for each Local Planning Authority, based upon household growth levels and linked to regional economic policy objectives would ensure that sufficient employment sites are allocated through the LDF process and provides a balanced approach to important strategy objectives of the WMRSS and WMES.

The most important element of a target based approach to employment land supply is ensuring that Local Planning Authorities provide a suitable portfolio of employment land.

**Question E4**

Comments: See E3.

**Question E5**

Comments: See E8.

**Question E6**

Comments: See E8.

**Question E7a**

Response: Yes.

Comments: Particularly in growth point locations - providing a linkage with regional housing policy.

**Question E7b**

Response: Yes.

Comments: To be used as a guide, with care over potential historical distortions.

**Question E7c**

Response: Yes.

**Question E7d**

Response: Yes.

Comments: Please see above reference to linkages with housing provision and use of the 2004 population projections.

**Question E7e**

Response: Yes.

Comments: see E3.

**Question E7f**

Response: Yes.

Comments: This should result in increased provision, as opposed to using available employment land.

**Question E7g**

Response: Yes.

Comments: Particularly relevant to support rural renaissance objectives.

**Question E7h**

Response: Yes.

Comments: Specific objectives of the Regional Economic Strategy (for example nodes along High Technology Corridors).

**Question E8**

Comments: The minimum employment target for the MUAs is accepted, which will assist the delivery of the WMRSS policy objectives and provide a linkage with housing policy. However, as with housing land within the MUAs the minimum approach must be set at a realistic level and relate to deliverable sites. Within the MUAs, it is important that the policy approach is informed by thorough assessments of employment land requirements and provision, undertaken by individual Local Planning Authority Employment Land Reviews. These reviews will ensure that the MUAs provide for a balanced portfolio of sites in the right locations, including the identification of both appropriate Brownfield and Greenfield employment sites (which should not preclude Green Belt sites). This framework should provide the basis for the re-allocation of land for housing or mixed uses, where this will benefit the wider regeneration objectives of the MUAs.

Concern exists over the approach to areas outside the MUAs. As stated in response to question E3, the use of targets is considered appropriate, which for areas beyond the MUAs should be expressed in terms of 'about' which will provide sufficient flexibility to achieve alignment with regional housing provision. This approach will provide for an economic development strategy that will maximise the opportunities for growth and development by local businesses and quality inward investment to meet sub-regional needs, whilst ensuring compatibility with the urban renaissance agenda for the MUAs. Development outside the MUAs will be within a sustainable policy context of the WMRSS and District LDDs, which will seek to provide an appropriate district-wide portfolio of employment sites outside the MUAs, which are attractive to differing businesses in order to facilitate job creation and widen their economic base.

Black Country employment land needs are likely to be met in part in locations close to but geographically outside the MUA boundary. Where this is regionally significant, such as is proposed by RPS at J11 on M6 in South Staffordshire, the RSS should make express provision for such proposals as part of the hierarchy of locations at which inward investment will be encouraged.

#### ***Question PEL1***

Response: Yes.

Comments: Given the significant levels of lower quality employment land which are required for housing purposes throughout the Region, but particularly within the MUAs, it is important that market reality informs and influences which employment sites are regarded as 'key' for retention for employment use, and which can be released for more appropriate uses, capable of being delivered in the short to medium term.

Building upon national guidance on employment land review, the WMRSS needs to provide greater regional guidance on the types and locations of sites appropriate for retention and re-allocation. Such advice needs to fully recognise the alignment of WMRSS housing objectives, particularly within the MUAs and larger settlement and address all possible sources of supply.

#### ***Question RIS1***

Comments: In the North Black Country and South Staffordshire, there has been success in bringing forward RISs.

### ***Question RIS2***

Comments: Sub-regional Studies should be undertaken to identify the need for further sites in each sub-region, having regard also to the availability of development options and their accessibility and linkages to wider areas.

### ***Question RIS3***

Comments: The emphasis should rightly be placed on high quality sites, but the uses that can be accommodated on RISs should be broadened to include uses across the range from certain B1 office developments, that are not best located in strategic centres, B1 research & development, B1 light industry, B2 general industry and B8 distribution.

Sites should be masterplanned and broad zones identified for prospective mixes of uses depending upon the size and configuration of the site. However, to maximise the potential for attracting inward investment, the policy should seek to encourage and allow flexibility and avoid over-prescription.

There should be a recognition that RIS investment is likely to require Greenfield land in many parts of the Region.

### ***Question MIS1***

Comments: MIS provision involves safeguarding large serviced employment land sites of 50ha for the potential occupation by single major companies. The policy has been unsuccessful in attracting such investment notwithstanding the availability of the Ansty site east of Coventry in Rugby Borough.

South Staffordshire has granted permission for a range of provision at Wobaston Road, north west of Wolverhampton for a MIS and also i54 High Technology site. There is therefore no need for the safeguarding of a further MIS opportunity in the North Black Country South Staffordshire area in the current RSS Revision.

There should however be further flexible RIS opportunities to complement MIS and RLSs where required.

### ***Question MIS2***

Comments: Each Local Authority should examine the potential for its area to attract and accommodate such development.

### ***Question MIS3***

Comments: Before sites are selected as MISs they require to be fully assessed in terms of their attractiveness and the realism of an allocation for this purpose. Where sites have failed to deliver, despite appropriate marketing initiatives, the policy should allow some flexibility for alternative forms of occupation especially where substantial investment has already been committed.

**Question RL1**

Comments: RPS considers that part of the future requirement can be accommodated on large RLSs meeting a range of locational criteria including rail connections. However, a significant proportion of the demand for B8 distribution centres will not have a rail connection requirement and the principal locational requirement will be accessibility close to main centres of population to the national motorway network.

**Question RL2**

Comments: RPS recognises that additional RLS should be considered. Selecting sites that acceptably conform to the proposed criteria will not be straight forward. Few opportunities will emerge in the region that satisfy the proposed criteria, particularly in terms of environmental acceptability. RPS is not in a position to answer this question directly.

**Question RL3**

Comments: RPS considers that the proposed criteria are broadly appropriate, qualified with the comment that a significant part of the demand for B8 distribution is not rail based and can appropriately be accommodated on motorway based sites close to centres of population on sites that can be more readily developed in terms of environmental and visual impacts. Provided the RSS recognises that B8 development in areas of high demand will not be restricted to RLSs, then the use of the proposed criteria for selecting specialist larger rail based facilities can reasonably proceed.

**Question RL4**

Comments: RPS has no comment on North Staffordshire RLS requirements.

**Question RL5**

Comments: The North Black Country and south Staffordshire area is agreed to be one of high demand for distribution and a suitable area for search for a RLS opportunity. However, concern is expressed over the desirability of developing a 50 to 75 ha site adjacent to one of the railway lines in South Staffordshire in terms of the expected environmental impact. There are alternative locations adjacent to the motorway nodes in this sub-region where B8 distribution uses can be accommodated, albeit at a lesser scale.

**Question RL6**

Comments: Priority should only be afforded to extending existing RSL where there is capacity in the rail and road infrastructure, demand and the availability of the necessary labour supply within a short commuting distance.