

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

Addendum to the report to reflect the consultation response received from
Planning Prospects Ltd on behalf of St Modwen Developments Ltd
(Respondent No 778)

Background

It has been brought to WMRA's attention that the consultation response to the Spatial Options consultation made by Planning Prospects Ltd on behalf of St Modwen Developments Ltd 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 asked Consensus Planning Ltd., the consultants who prepared the consultation analysis report, to analyse the consultation response.
2. The analysis of the response of Planning Prospects Ltd on behalf of St Modwen Developments Ltd is included in this addendum to the consultation report (see below).
3. This addendum and Planning Prospects Ltd's full response on behalf of St Modwen Developments Ltd 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 Planning Prospects Ltd 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.

The addendum should be read in conjunction with the original consultation report.

Analysis of the response

Housing

- H1-1** A continuation of WMRSS proposals will not deliver anything approaching the housing requirement indicated by household projections. This is entirely inconsistent with Government policy which seeks to ensure everyone has the opportunity to live in a decent home, which they can afford, in a community where they want to live. In fact, Option 1 anticipates a substantial reduction in the recently (2001-2005) achieved rate of net annual dwellings built, at a time of increasing demand and increased importance attached to affordability. It is entirely unrealistic and should be dismissed outright.
- H2-1** Option 2 is not ambitious enough, and fails to challenge sufficiently LPAs and the development industry to meet the projected requirement for new housing.
- H3-1** Option 3 is the only alternative that seriously considers and addresses the challenge to meet the demand for housing across the region, and provision of at least this level should be made.
- H2** No comment to be made.
- H3-1** See comments in relation to H1. Option 1 should be dismissed as an alternative.
- H3-2** A broadly even split between MUAs and other areas is appropriate.
- H3-3** A broadly even split between MUAs and other areas is appropriate.
- H4-1** See comments in relation to H1 (above). Option 1 should be dismissed as an alternative.
- H4-2** Recent (2001-2005) net actual annual build rates suggest that the levels required to deliver the number of dwellings associated with option 2 can be achieved.
- H4-3** Over the strategic time frame covered by the RSS the key constraints to meeting the level of housebuilding set out in option 3 will not be the capacity of the construction industry, but rather the control of supply exercised by the house builders. This notwithstanding, recent (2001-2005) net actual annual build rates already approach those required to deliver the number of dwellings associated with option 3, suggesting that this represents a realistic alternative.
- H5** No comment to be made.
- H6** See detailed comments under H7.
- H7** Bromsgrove:
The annual build rates proposed under each option are considerably less

than those recently (2001-2005) achieved. Indeed, the rates proposed under options 1 and 2 are lower than those historically implied by Structure Plan requirements. Whilst recognising the constraints on housing development in the district (e.g. green belt), Bromsgrove is well related to the Birmingham MUA. It should accommodate more growth, recognising in particular the potential offered by areas on the fringe of Birmingham. The spread of the Longbridge car plant from Birmingham into Bromsgrove is one example of such an area.

Worcester: St Modwen support the RSS identification of Worcester as a focal point for significant development, and its recognition under the Government's New Growth Points initiative. In particular, they support a level of provision for Worcester of at least that anticipated under option 3.

Malvern Hills: The tight administrative boundary of Worcester means that some of the city's housing growth could reasonably be directed over the border into Malvern Hills. Specific reference should be made to this, including indicative figures in terms of the number of dwellings that could be accommodated in this way.

Wychavon: The tight administrative boundary of Worcester means that some of the city's housing growth could reasonably be directed over the border into Wychavon.

Cannock Chase / Lichfield: The distribution of growth between these two districts is unbalanced. In Cannock, there is no increase in build rates between options 2 and 3 (both 280dpa), these rates are only slightly greater than that associated with option 1 (240dpa), and all are well below rates recently (2001-2005) achieved (427dpa). They are also lower than those historically implied by Structure Plan requirements. St Modwen believe there is considerable scope within Cannock to accommodate a greater number of houses in a sustainable manner, and that this would result in more balanced growth in this part of Staffordshire. In this context, St Modwen suggest that a rate of at least 430dpa is applied to Cannock. This should not be at the expense of growth elsewhere in Staffordshire; overall build rates for the county of at least the level of anticipated by option 3 are supported.

Rugby: St Modwen support the high level of housing growth for Rugby under option 3, in the context of its strategic location relative to other settlements, neighbouring regions and transport infrastructure, as well as the significant opportunities offered for employment growth, and regeneration of the centre.

Shrewsbury and Atcham: In circumstances where Shrewsbury is identified under the Government's New Growth Points initiative, and as the principal administrative and service centre for an extensive area in the north west of the region, St Modwen do not consider it appropriate that the distribution of housing here should be lower in options 2 and 3 than in option 1, which seeks a continuation of current RSS proposals. The role of Shrewsbury as a sustainable growth pole should be reinforced.

H8

St Modwen do not object to the identification of Burton upon Trent as a

foci settlement, but consider that this should not be at the expense of balanced growth across the rest of East Staffordshire district. In particular, the drive for growth in Burton upon Trent and the implications for development on green field land should be measured against the ability of Uttoxeter to accommodate a sizeable element of East Staffordshire's requirement.

H9 These settlements offer excellent potential for growth in housing but also employment, shops and services, to become sustainable and self sufficient sub regional growth poles. If this is balanced with a continued focus on development across the MUA's then perceived benefits – for example in terms of reduced commuting – can be achieved. (Please also refer to comments under H7, above, supporting growth in Worcester and, in particular, enhancing the allocation of Shrewsbury.

In general terms, the majority of St Modwen's land holdings comprise brown field sites. St Modwen consider that a pragmatic approach needs to be taken in terms of the release of green field land. However, flexibility also needs to be shown in terms of the range of uses that can be accommodated on brown field sites, as this offers the potential to reduce the reliance on green field land.

H10 In circumstances where thresholds are already set at the national level (PPS3), and where at the local authority level rates and targets should reflect a careful assessment of local requirements, it is not clear that the RSS should additionally provide a regional target. Rather, the most useful contribution towards delivering affordable housing that can be made through the RSS is the encouragement of substantial increases in new house building, in line with option 3. This will improve supply, the overall affordability of houses, and the number of affordable units.

H11 No comment to be made.

H12 The delivery of affordable housing is often frustrated by the application of rigid criteria that fail to take into account the particular challenges of bringing individual sites forward. The dual policy aims of developing brown field sites, and providing affordable housing at a particular level, may be incompatible where the exceptional costs attached to the former make the latter difficult to achieve. The situation then arises whereby an otherwise suitable and sustainable brown field site with the potential to make some contribution to affordable housing needs is not brought forward, as making the full contribution required by local policy would render the scheme unviable. Such sites are then incapable of contributing to either market or affordable housing requirements.

In this context, the RSS could usefully provide overarching exceptions criteria whereby local guidance on the provision of affordable housing can be tempered by site specific circumstances.

H13 No comment to be made.

H14 See comments in relation to H10, above.

H15 No comment to be made.

H16 As outlined above, St Modwen support option 3, the direction of development towards the foci and a balance between growth within the MUAs, and other urban areas. However, this clearly presents challenges in terms of delivering this level of dwellings and the associated infrastructure. If the overall build rates through to 2026 are to be achieved, and if Government objectives seeking to ensure everyone has a decent and affordable home are to be met in the West Midlands, then it is essential that early, positive action is taken in relation to the release of land.

H17 Inflexible maxima for areas outside the MUAs are inappropriate. Indicative targets for these areas are important, and it is also important that the regeneration of the MUAs is not undermined. However, the application of rigid maxima implies an embargo or moratorium on further housing development will be imposed when those limits are reached. As circumstances change over the extended RSS period this may be extremely unhelpful where, for example, actual need outstrips that originally planned for. The planning system is typically slow to respond to make allowances for such situations, and there is the threat that meeting evolving housing needs will be frustrated by outdated targets having been met.

For areas outside the MUAs, targets should be set, but acknowledged as being flexible. When the limit has been reached, an explicit policy mechanism should be put in place to enable additional provision where it can be demonstrated that the target is no longer relevant, has been superseded, or other special circumstances apply.

H18 The MUAs should remain a focus for housing development, and their renaissance should not be limited other than through standard environmental controls. However, a broader definition of MUAs should be applied in this regard, taking account of the ability of surrounding districts to accommodate growth at their shared borders, e.g. Bromsgrove could accommodate some MUA development at its border with Birmingham.

Employment land

E1 Quantification of future employment land requirements in the RSS will provide certainty and consistency across the region.

E2 With no Structure Plan guidance in place, it is important that the distribution of employment land requirements is dealt with at the district level.

E3 A reservoir of employment land is important and is supported by St Modwen. However, the concept of topping up readily available land with not readily available sites needs close examination. Clearly, there are often very considerable impediments to the remediation of the latter and significant difficulties in making it 'readily available'. If the reservoir concept is not treated in a flexible manner there is a danger that sites offering fewer advantages from an employment perspective

could be advanced in preference to more challenging sites with greater potential, or indeed mothballed in the supply of not readily available sites, simply to ensure that a nominal land bank is maintained. Sites with few advantages and little to offer from an employment perspective should not be protected in a reservoir, particularly where they could be beneficially developed for other uses.

E8

St Modwen's comments on the Housing Spatial Options support the highest level of growth (option 3) and a balanced approach in terms of the distribution of this housing between MUAs and other areas. They also strongly endorse the enhanced role anticipated for the sub regional foci. The approach should be to modify the reservoir and longer term requirements to reflect the levels of population and household growth indicated under option 3, and the associated increase in labour supply. This implies an increase in the reservoir and longer term requirements for key locations including in particular Worcester, Telford, Shrewsbury and Rugby.

St Modwen also recognises the importance of serving areas of deprivation and employment need, and on achieving an urban renaissance across the MUAs. St Modwen also consider that the trend based approach underestimates requirements in the Black Country and in Walsall in particular.

PEL1

Whilst St Modwen support the principle of protecting employment land, it is crucial that emphasis is placed on retaining the best sites that can realistically contribute in a positive manner to the portfolio of employment land. The concept of maintaining a reservoir of employment land and a supply of not readily available sites brings with it the risk that sites which are in fact poorly placed to meet employment needs are mothballed solely to ensure that a nominal land bank is maintained. This is inefficient, unsustainable, and prevents such sites bring brought forward to meet other needs. Clearly the objective should not be to retain a certain level of employment land per se, but to protect those sites of genuine importance to meeting employment needs.

Moreover, in general terms, St Modwen support the development of brown field sites as a priority. Such sites, in a variety of locations but including in particular more rural areas, can make an invaluable contribution to employment land supply, especially in making low cost accommodation available.

PEL2

No comment to be made.

RIS1

The gaps should not be filled in. Whilst the existing RIS may have a role to play in the delivery of an appropriate portfolio of employment sites to maximise inward investment, they are somewhat inflexible, such that the extent of their current provision is sufficient.

RIS2

N/A

RIS3

Some greater flexibility in terms of employment and other land uses may be needed to ensure that RIS are brought forward in the most effective and beneficial manner – particularly where market requirements are not being met by other sites in the locality.

MIS1	No comment to be made.
MIS2	No comment to be made.
MIS3	MIS provide an important element in the portfolio of inward investment sites.
RL2	At least two further RLS are needed – one located in the Walsall area / north western part of the conurbation and one located in the Stoke-on-Trent / North Staffordshire area.
RL3	<p>a. A smaller area, say in the order of 40 hectares, could still accommodate a viable RLS.</p> <p>b. Good rail access is preferred but not essential.</p> <p>c. It seems unlikely that many (or indeed any) of the major routes would have low levels of network.</p> <p>g. Good access to labour is preferred but not essential.</p>
RL4	The North Staffordshire area, and Stoke-on-Trent in particular, should be a priority location for an RLS.
RL5	<p>b. Good road capacity available on the M6 toll, Walsall would represent an appropriate location.</p> <p>Other Suggestions. Facility needed to perform important sub regional role serving the north of the Region.</p>

Centres/Offices

SC1	<p>The Regional Centres Study, quite properly and necessarily, took a strategic approach to the quantification of additional comparison retail development across the region. In so doing, it applied assumptions and data inputs that will be subject to change, may not be appropriate in every local circumstance, and in some cases are open to challenge. In this context it is important that the figures emerging from this work and reflected in the table on page 45 are explicitly recognised as indicative of the broad order of development that will be appropriate within individual centres, and not as rigid limits. Further and more detailed work will be required at the local level to inform policy and the determination of planning applications. This should use the Regional Centres Study as a starting point, but then use more locally specific inputs and assumptions to gauge whether some deviation from the floorspace levels identified can be justified.</p> <p>Housing option 3 – supported by St Modwen – advocates the release of land for residential development earlier in the plan period than had previously been anticipated, and particular locations are also being promoted as growth points.</p>
SC2	The Regional Centres Study considers that there is a case for considering that over-trading at the aggregate level – that is aggregate expenditure in relation to aggregate floorspace across the catchment area – should represent an indicator of both qualitative and quantitative need. However, due to methodological difficulties associated with

strategic work of this nature the Study is unable to quantify this and gauge whether the market is 'in balance' or not, and no allowance for over-trading is made.

In this context, the Study states that it is for local authorities to consider making adjustments for over-or under trading when preparing their assessment of retail need in the LDF process. This, and indeed the capacity for LPAs to make other adjustments to the data and assumptions underpinning the Study to reflect local circumstances, should be explicitly recognised in the RSS.

The ability to exercise discretion and translate the Regional Centres figures to reflect local circumstances will be particularly important for districts and settlements which have been identified as focal points for significant growth.

There is no evidential basis for the assumption made in the Regional Centres Study that e-commerce will account for 20% of sales by 2021. Indeed, the Study actually points to evidence that it will in fact plateau at 12% by 2014. In this context, and in the absence of properly researched evidence to the contrary, this figure of 12% should be adopted.

SC3 The referral threshold for tier 3, 4 and 5 centres are too low and should be set at the same level as tier 2 centres. The thresholds should not include comparison retail that is essentially subsidiary to other, primary uses e.g. health and beauty and household products in proposed food superstores, or fitness equipment in proposed health and fitness clubs.

SC4 The protection implied here is already provided through the expectations set out in PPS6 in relation to appropriateness of scale, and should also be provided at the local level by individual authorities through the LDF process and the expectation that they will provide guidance on limits to development in different types of centre. There is also considerable diversity in the size, role and function amongst both strategic and non strategic centres, and in terms of their relationships with one another. In this context, this question of scale should not be dealt with at the regional level, other than in terms of underlining the importance of maintaining an appropriate network and hierarchy of centres.

SC5 St Modwen support the principle that people should be able to meet their shopping and leisure needs close to where they live. However, it is difficult to see how policy could 'prioritise' development in particular centres, as this implies development in other centres, which may be needed for equally valid reasons (e.g. for regeneration, or to serve a rapidly growing population), would be held back. Rather, the RSS should express particular support for, and emphasise the importance of, development in centres that demonstrate one or more of a series of criteria including, for example:
High outflow – people currently travelling away for retail and leisure
Weakness – centres in need of regeneration
Growth – centres serving districts identified as focal points for expansion.

- SC6** St Modwen support this principle in general terms, subject to the detailed comments made above, under SC5.
- SC7** St Modwen support this principle to the extent that it would foster growth in the centres serving districts identified as focal points for expansion, such as Worcester, and not prejudice investment in centres in need of regeneration and development to reduce outflow, such as Cannock or Rugby. Retail policy has been successful in directing investment back to centres, but this has tended to be focused on the largest destinations such as Birmingham City Centre, and this process is set to continue with major (and indeed needed) improvements planned for centres such as Wolverhampton and Walsall. It is important that emphasis is now placed on centres that have so far been bypassed, smaller centres, and those most in need of investment.
- O2** The application of trend based projections is inappropriate in circumstances where key factors underpinning that trend – such as the rate and distribution of population growth, and structural changes to the economy – will be substantially modified under a number of the Strategic Options being considered, or will no longer subsist. There is a risk of a mismatch between Options that anticipate a marked change in direction for the Region, and office development based on a historic position.
- O3** A further iteration of the Centres Study should be carried out in light of the preferred options.
- O4** A rigid approach to the sequential test in the terms set out in PPS6 is inconsistent with the policy objectives for the RIS. It also risks the exclusion of sites that may be highly sustainable, or have an important role to play in meeting wider planning and development objectives, but are not well related to centres which, essentially, are defined on the basis of their retail function. As such, a more flexible approach should be followed.
- O5** There is no clear method by which a meaningful percentage could be set at the individual district level. Equally, this would risk uneven and unbalanced development as out of centre sites would tend to come forward first, until the maximum level was reached. A criteria based approach (see O7 and O8) would avoid these problems.
- O6** N/A
- O7** A criteria based solution can retain the basic principles of the sequential test, whilst advancing other principles that also support sustainable development.
- O8** Site accessibility by all means of transport, but particularly by public transport and to cyclists and pedestrians.
The extent to which co-location of mutually supportive activities would be promoted.
The diversity of other uses in the locality of the site.
The extent to which the development of the site would enable, for example, other beneficial uses locally to come forward, or transport improvements to be made.

The relationship of the site with existing communities.

- O9** RSS policy should seek to achieve sustainable development. Whilst, generally, this will often mean directing investment to centres, in the case of office development this need not always be the case. A more flexible and pragmatic approach is required.
- RC1** No comment to be made.
- RC2** No comment to be made.
- RC3** No comment to be made.
- RC4** No comment to be made.