

**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  
GL Hearn on behalf of The Cawston Consortium (Respondent No 1110)**

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**Background**

It has been brought to WMRA's attention that the consultation response to the Spatial Options consultation made by GL Hearn on behalf of The Cawston Consortium 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 GL Hearn on behalf of The Cawston Consortium is included in this addendum to the consultation report (see below).
3. This addendum and GL Hearn's full response on behalf of The Cawston Consortium 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 GL Hearn 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*

The provision of options based on a focus of provision towards Major Urban Areas (MUAs) fails to fully recognise the opportunities and sustainable options for growth existing at foci centres and which may be brought forward sooner in the plan period.

Paragraph 2.6 of the RSS recognises that to meet the government's sustainability objectives will mean reversing the movement of people and jobs away from the MUAs. This objective however, may sit uncomfortably with adopting positive measures to achieving a more balanced and sustainable pattern of development across the Region.

Whilst the role of the MUAs is important, achieving an economically successful, outward looking and adaptable Region, which is rich in culture and environment, should involve taking a holistic approach to the growth options and distributing housing to areas best placed to deliver economically, socially and environmentally sustainable growth. Concentration of growth towards the MUAs as principle, without due regard to the opportunities for growth at other centres until later in the plan period, imposes inappropriate and artificial constraints on the ability of other settlements to fully contribute to the delivery of sustainable and cohesive communities. It is also unlikely to deliver the anticipated benefits to the MUAs as out-migration from the MUAs is not simple a consequence of housing demand or job opportunity. In that respect, reversing the movement of people and jobs away from the MUAs should be addressed through action and initiatives within the MUAs and not by imposing constraints in the other settlements to the potential detriment of those settlements and the sustainable growth and regeneration opportunities they offer.

The focus for the level and distribution of housing should be based on recognition of the role of existing centres, their ability to accommodate additional housing and the impact additional housing provision will have, either positively or negatively, on the economic, social and environmental capital of the settlement and its surroundings.

#### *H2 – 1*

Spatial options and the distribution of development should be based on consideration of the availability and deliverability of housing with regard to economic opportunity and environmental constraints, housing choice, access to jobs, transport efficiency and ensuring local distinctiveness.

The spatial options do not seem to be prepared with consideration of all these aspects for each identified settlement including the foci settlements. Rather the levels of provision appear to be based on level provision suggested by the strategic authorities without robust evidence that the levels are appropriate, will deliver sustainable growth and maximise the opportunity for strengthening communities and place making particularly at the foci centres.

There does not appear to be a particularly robust evidence base. The background evidence prepared appears to be an analysis of historic trends, matched with comment by the strategy authorities.

Given current housing demands and the need to promote sustainable development and foster sustainable, cohesive and inclusive communities, spatial options should be based on a more thorough assessment of development opportunity throughout the region, and particularly the foci and smaller settlements, including consideration of eg how housing development sites may contribute to the delivery of other need facilities, such as transport infrastructure and community provision.

***H3 – 1***

The options appear to be based on a distribution of housing that favours development with the MUAs based on an expectation that more housing within the MUAs will stem the migration flow from them. This is also seemingly informed by strategic authorities' considerations as to their ability to provide additional housing with their areas. There does not appear however, to be significant rationale for the level of provision identified by the strategic authorities. The level of provision within all areas should be based on consideration of the issues set out under question H1 above.

***H5***

It is unclear what impacts this questions refers to. The RSS should recognise that all development will result in impacts, however, it is the nature and degree of the impacts that is important. In this respect, the WMRSS should look to promote development that maximises the delivery of housing required to meet identified needs and maximises opportunity for planned sustainable growth and economic and social prosperity. This will not be achieved by artificially constraining development to the MUAs at the expense of foci and other settlements, particularly where the foci and other settlements can make a greater contribution to the meeting housing and economic needs within a sustainable framework which promotes communities.

***H6***

Please see response for H7 below.

***H7***

Option 1 for Rugby fails to meet identified demand and is therefore considered to be too low.

It is notable that Options 2 and 3 for Rugby promote significantly different levels of housing which is not matched by any other areas on a pro rata basis. Development opportunity at Rugby should be recognised in the Options but should be based on a thorough consideration of impacts upon the existing settlement and how development may best promote sustainable growth, including community cohesion, integration of new development with the existing settlement and the delivery of infrastructure.

It is assumed that the level of growth set out by Option 3 could be a reference to the Radio Station site and other site(s) which would require development in neighbouring districts. Whilst a level of growth higher than Option 2 is supported it should be at a level which recognises the potential of sustainable urban extensions rather than the development of

large free standing sites divorced from the existing settlement.

The preferred Option for Rugby should therefore be at a level between Option 2 and Option 3 with the defined figure determined following a more thorough analysis of the development opportunity within the area that includes full consideration of economic, social and environmental sustainability objectives.

**H9**

The distribution of development should be based on consideration of the availability and deliverability of housing with regard to economic opportunity and environmental constraints (including the Green Belt), housing, choice, access to jobs, transport efficiency and ensuring local distinctiveness. Foci settlement should be able to accommodate growth within a sustainable framework that promotes and augments existing communities and where possible delivers additional benefits such as infrastructure provision.

Significant development at the sub-regional foci of Rugby is appropriate and should be addressed through deliverable sustainable urban extensions to the settlement. Such development would be in keeping with the above considerations, will help ensure the retention and continued protection of Green Belt land and will thereby maximise the opportunity for delivering sustainable growth and communities.

**H10**

Affordable Housing targets should be based on identified housing need, but should remain flexible to allow variation over the RSS plan period in the light of completions and the planned phased delivery of provision.

Targets should not be determined without clear and robust evidence that they are realistic, economically viable, deliverable and contribute to the creation of balanced, inclusive and cohesive communities.

**H14**

No. Thresholds for Affordable Housing should be local consideration and addressed at the local level.

**H16**

Yes. Bringing forward development at the earliest opportunity within the foci will help ensure a continual managed supply of housing and will thereby help ensure the continual delivery of needed Affordable Housing, infrastructure and community facilities.

**H17**

Yes. Please see comments in relation to earlier questions.

**H18**

Yes providing the targets are part of a balanced provision of housing across the region that recognises population needs, the role, character and opportunity of other settlements and is based on robust and credible evidence.