

WMRSS PHASE TWO REVISION – DEVELOPING THE PREFERRED OPTION

RURAL PROOFING REPORT

Introduction

As part of the revision of the West Midlands Spatial Strategy Phase II, WMRA has been working with partners in the Rural Accord and the West Midlands Rural Affairs Forum (WMRAF) to ensure that the revised strategy has been adequately 'rural proofed'. That is to say, that there are correct mechanisms in place to systematically:

- Consider whether policies are likely to have a different impact in rural areas because of rural circumstances and needs;
- Make a proper assessment of those impacts if they are significant;
- Adjust the policies, where appropriate, with solutions to meet rural needs.

This document reports on the second major stage of that rural proofing process. The report comments on the developing preferred option draft from a rural perspective. It builds on the earlier Rural Proofing Report prepared as part of the Policy Options development, the WMRAF Policy Options Consultation Response and the outputs from a Rural Renaissance Working Group workshop¹ with key regional rural stakeholders held on 03 September 2007.

HEADLINE issues and messages contributing to the development of the draft RSS Preferred Option from a rural perspective

1. Every encouragement should be given to embedding rural issues throughout the RSS Preferred Option document through:
 - Understanding what sustainable rural communities really are – their diversity and demographics taking into account sparsity and accessibility issues;
 - More effective rural proofing of housing policies at all levels;
 - Planning policies that enable appropriate rural settlements to grow and adapt to meet their changing economic and social circumstances;
 - A real increase in and targeting of resources to meet rural needs for affordable housing;
 - Empowering local communities to be involved in shaping their own solutions and having a stake in their futures;
 - Accepting prosperity, wellbeing and quality of life as part of both urban and rural renaissance.
2. Any move to a low carbon region should not bring in its wake a lack of development (housing or employment land) in rural communities. Rural communities can be sustainable just as much as urban areas and that looking at everything through the current lens of only allowing development in larger settlements where there are good transport routes is too simplistic.

¹ See Appendix 1

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3. We would urge you to recognise that the general principle of focussing development in larger urban centres is in no way undermined by allowing appropriate development in a range of rural settlements [appropriate = contributing to overall sustainability of the community].

Specific Issues Identified by Chapter:

Chapter 2: Towards a more sustainable region

Ref:	Comments Received	Action taken by RSS Team following Rural Proofing
Pg 2-12	Rural communities can be sustainable just as much as urban areas and that looking at everything through the current lens of only allowing development in larger settlements where there are good transport routes is too simplistic. Need to apply standards equally to MUA and rural areas	No action, as this is recognised in existing Rural Renaissance policies.
SRI D	Rural disadvantage: Potential for negative spin-off impact on affordability: rural areas would be particularly hard hit because developments lack economies of scale and infrastructure, transport of materials, etc would be higher	Policy SR1 sets direction of travel but does not set standards. Standards are included in Policy SR3 Sustainable Design and Construction, which recognises benefits of economies of scale by setting higher standards for larger developments.
SR2	It would be helpful to define ‘sustainable communities’ especially in a rural context	Sustainable communities defined by Government. Policy SR2 sets out requirements for large developments in MUAs, settlements of significant development and other areas where development is concentrated.
Pg 2-12	Need cross reference in supporting text to UR and RR chapters to ensure consistencies	No action. Some cross-referencing to UR chapter in table showing how Climate Change concerns integrated across RSS.
SR2	Does SR2 only apply to the II settlements of significant development? What about the rest of the region?	SR2 amended to refer to MUAs and other areas where development is concentrated, not just settlements of significant development.
SR3	Potential for negative spin-off impact on affordability: rural areas would be particularly hard hit because developments lack economies of scale	Policy SR3 Sustainable Design and Construction recognises the benefits of economies of scale by setting higher standards for larger developments.

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Chapter 3: The Spatial Strategy for the Development of the West Midlands

Ref:	Comments Received	Action taken by RSS Team following Rural Proofing
Pg 15 (b)	Rural renaissance is necessary across the rural areas of the whole region not just in the RRZ – this is only one of a number of delivery mechanisms for funding in the revised WMES. Development of other settlements <u>has</u> to be considered.	Amendments made to 3.10b to reflect this point
Pg 15	The listing of an hierarchy of settlements is advocated – not stopping at market towns: Smaller settlements (+ rural hinterlands) are currently excluded	Reference to 'larger villages' now included in 3.10b
Pg 20-24	Consistency in terms of content advocated, e.g. Worcestershire, South Warwickshire and Staffordshire have similar problems to Herefordshire & Shropshire but this is not emphasised	Specific amendments now made where suggested by Strategic Authorities
Overall	There is too great a focus on housing rather than the broader range of issues relating to the delivery of sustainable communities and this results in a lack of attention given to rural areas outside the SSD's	Noted – Policy RR1 – Rural Renaissance already provides this balanced overview NO CHANGE
Overall	Addressing rural needs also contributes to urban renaissance. Focussing development in larger urban centres <u>is in no way undermined</u> by allowing appropriate development in a range of rural settlements	Noted – urban and rural renaissance are two sides of the same coin
Overall	Drawing a distinction between 'near urban' and 'more remote rural' areas would be helpful. Much of the rural area is not dependent on the MUA for employment	Already adequately covered in Policy RR1 – NO CHANGE necessary
	Less sustainability of rural areas presumed, whereas small settlements and communities are/can be fully sustainable – particularly in 'remote rural areas	Noted
	Check for consistent references to SSD, rather than ASD	Amendments made

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Chapter 6: Communities for the Future

Ref:	Comments Received	Action taken by RSS Team following Rural Proofing
Overall	There is an unwarranted concentration on Urban Renaissance, implying that RR is not a problem, but RSS applies to <u>whole</u> of region	
Pg 25	Housing demand problems are worse in rural areas – fewer options available. (Paras 6.2, 6.3 & 6.4) – see also SA 2.3.1	Depends on the area and the definition of ‘rural’. A range of options to meet needs are available in villages and market towns. Housing exception sites can also be used to meet need in small settlements. NO CHANGE.
	Break old habit of seeing housing outside urban areas as ‘bad’: we now have improved policy tools to deliver appropriate solutions	New development must be in sustainable locations. NO CHANGE.
Pg 31	CF2C: Should read ‘small rural settlements’ not ‘villages’. Presumption should be for ‘affordable housing’ in CF2, but settlement hierarchy should not apply to affordable housing. Second sentence generates duplication: suggest retain first sentence + Cross reference to affordable housing policy and what it is trying to achieve in terms of sustainable communities and regeneration	These points are addressed in paras 6.21 and 6.49 of the Communities for the Future Chapter
Pg 43	CF7: Targets are under-estimate of the need. Is it helpful to have a target which is below?	Targets take account of the proposed overall level of development and the likely deliverability of affordable housing. NO CHANGE.
Pg 39	CF5: Allocation of all brownfield land to housing is flawed. Employment land/other required to satisfy WMES objectives. (6.31 helps but not policy);	Not all brownfield land is allocated to housing. PfA policies protect the best employment sites from housing development. Also the larger developments may well be mixed use anyway. NO CHANGE.
Pg 43	CF7B: ‘Intermediate’ – even shared ownership can be unaffordable in some rural areas	This issue is not restricted just to rural area. NO CHANGE.
Pg 47	CF8 – clarify ‘migrants’ economic/retirees? Are they from within/outwith region? Consider potential for rural older person villages/settlements – strong evidence of local needs from demography of sub-regions e.g. Hereford, Malvern, Shrops. – perhaps one means of reducing ‘under occupation’ in other housing stock	Provision for older people needs to be considered as part of local housing needs assessments and LDDs. Any provision must be in sustainable locations. NO CHANGE.
Pg 47	CF8 Bii – clarification of where ‘ <u>some</u> other settlements’ would be useful	To be clarified through local housing needs assessments and LDDs. NO CHANGE.

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Chapter 7: Prosperity for All

Ref:	Comments Received	Action taken by RSS Team following Rural Proofing
Overall	Is structure of chapter consistent with the direction of that the WMES is now taking? Need cross referencing to relevant UR and RR policies	There has been very close liaison in the preparation of the RES and RSS reviews. No further changes required. Since UR and RR are maintained from the earlier RPG no further cross referencing is required.
Pg 54	PA2: If there is a URZ policy why not include RRZ in this chapter too? Or move PA2 to UR chapter?	URZs are a key focus for the PfA Chapter. Consideration could be given to shifting the RRZ policy into this chapter (rather than the direction suggested) but this would weaken the Rural Renaissance chapter.
Pg 55	PA3B – restricts claim of the new WMES which is intent on providing less constrained boundaries for surrounding areas to maximise their potential	Not accepted. It is important that the urban focus is retained.
Pg 61	PA6A – using historic/trend related employment land development may make restructuring more difficult	The basis of the allocations is wider than this although an attempt has been made to address the historic legacy of large allocations in the past.
Pg 65	PA7 – there are also rural RIS e.g. Nuneaton/Rotherwas. Current presumption is that they are all in MUAs	Not accepted. The case for a new RIS and its location has to be made in the context of the changing position at Ansty.
Pg 72	PA14 –The rural economy is much more than farming and forestry which are extensive but employ low numbers and are seeking diversification and other opportunities. Need to consider positive role of home working as recognised in WMES	See change to PA1, B iv).
Pg 72	PA14 C: Emphasis on increasing GVA in rural areas	The importance of increasing GVA is a point relevant to the whole region and is picked up in the amendment to para 7.2.
Pg 72	PA14 B: Potentially not recognising significance of the rural economy that takes place outside towns	The policy reflects the overall spatial strategy which is unchanged.

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Pg 73	PA14 D: Need specific recognition of Live/work opportunities	This is already covered by the policy.
Pg 73	PA15: implies that farm diversification will only be small, but increasing industrialisation of farming and food production needs to be recognised, along with re-use of rural buildings	The policy makes no reference to scale, either small, or large. No change required.
Pg 90	PA13B: flexibility needed for office development market/historic towns where central capacity is limited	No change – policies already provide for this.

Transport Policies

Policies: T6, T7, T8 and T12

No specific comment made

Waste Policies

Ref:	Comments Received	Action taken by RSS Team following Rural Proofing
Pg 134-141	Rural areas lack economies of scale for many types of waste facility – transfer capacity required	Policy W1 has been amended to include provision for providing “Waste Transfer Stations”. Policy W7 states “All Waste Planning Authorities outside the Major Urban Areas should identify sites for the treatment and management of waste arising from areas of low population and scattered communities” and this includes providing “Waste Transfer Stations”.
	Hydro-geology and economies of scale will dictate the location of future landfill capacity	This is a matter of fact that RSS cannot influence and is taken into account in Policy W12 (now W11).

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Appendix 1

The Rural Proofing has been undertaken by members of the West Midlands Rural Affairs Forum and the Rural Renaissance Working Group:

Nick Taylor	Shropshire County Council
Adrian Cooper	Shropshire County Council
Liam Cowden	Shropshire County Council
Liz Dand	Staffordshire County Council
Liz Down	Staffordshire County Council
Sarah Faulkner	National Farmers Union
Jo Hill	West Midlands Regional Assembly
Sarah Hunt	Government Office West Midlands
Hazel McDowall	Natural England
David Nicholson	Herefordshire Council
Claire Robinson	Advantage West Midlands
Keith Parry	Rural Housing Enabler, Herefordshire
Peter Smith	Worcestershire County Council
Sara Roberts	West Midlands Rural Accord
Zena Lynch	West Midlands Public Health Group

The WMRA responses and changes were provided by the RSS Policy Leads and approved by the RSS Task Group and RSS Strategic Management Steering Group. Details of the membership of these groups can be found on the website: www.wmra.gov.uk