

WMRSS Phase Two Revision Spatial Options Development

RURAL PROOFING REPORT

Introduction

Rural Proofing is the process by which strategies, plans and policies are evaluated for their impact on those who live and work in the countryside to ensure that rural needs are not overlooked. It also assesses the different impacts that a strategy or policy might have in rural areas compared to elsewhere. Where it appears unlikely that the needs or circumstances of rural areas are being met, adjustments might be identified. Strategies and policies should therefore benefit from a rural proofing assessment to ensure that all potential impacts are identified and addressed.

Rural Proofing of the West Midlands Regional Spatial Strategy, Phase Two Spatial Options

In pro-actively assessing the development of the Spatial Options for the WMRSS Phase Two Revision the Rural Accord's Rural Proofing Team¹ has assessed:

- Whether the various options are likely to have a different impact in rural areas from that elsewhere, because of the particular characteristics of rural areas; and
- Where necessary, what adjustments or compensations might be made to reflect rural needs and circumstances.

In anticipation of getting rural proofing inbuilt into the WMRSS Phase Two Revision process Rural Proofing team members attended the Reference Group Meetings: Regional Housing Group, Regional Transport Group, Rural Renaissance Working Group, Regional Environment Group and Rural-Urban Integration. These and other Reference Groups provide the forum for regional partners and stakeholders to input their ideas/opinions into the development of the Phase Two Spatial Options.

The Countryside Agency's "Policy Makers Checklist" has also provided a starting point against which the WMRSS Phase Two Revision has been assessed. It draws for the Agency's comprehensive rural proofing checklist to identify areas that are most likely to be impacted on by housing figures, employment land, centres, transport and waste related policies.

Rural Proofing

Whilst not rigidly driven by the checklist, it has given guidance to the team and enhanced their ability to challenge the options ensuring that they reflect rural needs and circumstances.

¹ See Appendix 1.

1. Will the revised strategy or any of the options impact on the access to and maintenance of services for the rural population?
2. What impact will there be on rural communities?
3. Will there be an additional cost of service delivery/cost of travel to rural areas?
4. Will people's access to employment be affected?
5. How much impact will there be on rural businesses and the economy?
6. Will there be an impact on the land-based industries, e.g. mining for minerals?
7. How will rural disadvantage be considered and tackled?
8. How much will new infrastructure, buildings or development sites impact on rural areas, given that there are few brownfield sites and fewer locations where housing or other development will be acceptable?
9. Is there likely to be any impact on the quality, character and biodiversity of the natural and built rural landscape?
10. Will there be any impact on people wishing to reach and use the countryside as a place for recreation and enjoyment?

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Note:	<p>The overall impression is that "rural" does not figure much. It is suspected that anyone responding to the consultation on the document from a rural area would find it quite difficult to find matters to relate to. It is acknowledged that this is a regional document but that should not mean that it mainly talks about the conurbation and main foci with only the odd mention of market towns and just about nothing about smaller settlements. There is a danger that rural areas are perceived merely as areas of a high quality environment.</p>	<p style="text-align: center;">GENERAL COMMENT</p>
Pg 8	<p>CONTEXT: Under the Climate Change subtitle it is suggested that “policies to protect wildlife and habitats which enable migration of native species” is included, as is “use of green infrastructure principles”.</p>	<p>Accept that these references would add detail but do not alter the overall thrust of the Spatial Options document. The main focus on detailed environmental strategy is intended to be in Phase Three of the WMRSS Revision. The ‘implications Group’ and background report, published at the same time as the Spatial Options should examine these issues.</p>
Pg 9	<p>More consideration should be given to biodiversity/green infrastructure. Whilst not simply a rural issue, the main impacts are likely to be in rural areas. It is suggested that ‘protecting and enhancing biodiversity (QE7)’ is an inclusion in paragraph 1.</p> <p>The green infrastructure agenda has developed since the RSS, and should be encompassed within the City Regions approach as part of the Phase 2 revision (i.e. not deferred to Phase 3, or allowed to fall between the cracks)</p>	<p>As above.</p> <p>Agree – measures to mitigate the impacts of housing development will be considered as part of the development of the Preferred Option. A question regarding the mitigation of housing has been added to the Spatial Options, <i>Any new house building will put pressure on environmental resources in the Region and have the potential to increase carbon emissions. However an element of housebuilding is essential</i></p>

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		<i>to meet the ongoing housing demands of a population. H5 What measures could be included in RSS Policy to minimise these impacts?</i>
Pg 9	<p>Natural England would like to see the environment as a separate element of the context, covering issues such as:</p> <ul style="list-style-type: none"> • the use of the Regional Assembly’s developing green infrastructure prospectus to address quality of life issues (in rural, as well as urban areas) • the elements of climate change that relate to the use of natural resources to help mitigate for climate change e.g. allowing flood plains to perform their natural function to protect developed areas from flooding (whilst also promoting recreation or restoration of wetland and other habitats), • consideration of the environmental capacity of natural resources to provide or support the range of development functions required through the RSS 	<p>Climate change implications will be considered as the Preferred Option is developed. A specific Climate Change policy is subject to discussion for Phase Three.</p> <p>Environmental capacity of the Options is being considered as part of the implications work being undertaken, this will in turn influence the development of the Preferred Option.</p>
Pg 9 Pg 9 (cont)	<p>Consideration should be given to the addition of the following topics: Green Infrastructure; Sustainable design and construction; Environmental Capacity.</p> <p>The environment has a finite capacity to accommodate increased growth before irreversible damage or depletion occurs. Hence the concept of environmental capacity is an essential and fundamental concept if the regions is to achieve sustainable development. This is compatible with the UK Sustainable Development Strategy “Safeguarding the Future” (2005) which presents working within environmental limits as one of its guiding principles – Environmental capacity is a better way of expressing this.</p>	<p>This level of detail will be picked up through the LDF process.</p> <p>Environmental capacity is complex and may be finite on a global scale but, regionally and locally, effect of growth and development can be mitigated to allow it to remain within capacity. If people / households exist, they need to be housed. Effects of transport, energy consumption etc can be reduced for any given quantum of development by policy / lifestyle changes – see H5.</p>
Pg 9 Pg	INTER REGIONAL CONTEXT: From the rural perspective, success of Urban Renaissance is essential if we are to avert the	Accept – rural /urban renaissance are 2 sides of one coin.

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10	scenarios outlined in the Roger Levett Report [West Midlands Regional Rural Delivery Framework: Sustainability Appraisal commentary] - Suggest adding in some statement to this effect as context for this section.	
Pg 10	Milton Keynes South Midlands Growth Area: Again, this is also a rural issue, since it affects the location/settlement of inter-regional commuters.	Accept – add reference to effect on rural renaissance. Amended para: The MKSM Sub Regional Strategy was published by the Secretary of State on the 17 March 2005. It is part of, and revises, the three existing RSSs for the East Midlands, East of England and South East as they relate to the Milton Keynes South Midlands area. Work is underway to assess the economic impact of the proposals for MKSM and the impact that it will have on Urban Renaissance. This work is being led by Advantage West Midlands (AWM) and the West Midlands Business Council. <i>It is recognised that the MKSM Growth area may also have rural renaissance implications, for example due to increased inter regional commuting.</i>
Pg 12	Mention of Defra's Rural Strategy 2004 should be made and its three priorities for rural policy and should the Rural Affairs Forum not get included somewhere? The Rural Delivery Frameworks were one of the outcomes but strengthening the rural stakeholder involvement is important too, e.g. Page 13 about English-Welsh border interactions but it does not mention the RAF Cross-border study.	The Rural Strategy is mentioned. It is the role of the Project Plan to set out the involvement of Partners. The Rural Affairs Forum has been involved during the Options stage and will be fully briefed prior to the formal consultation period in January 2007. The Rural Affairs Forum secretariat has been offered to include all their members on the consultation database. Rural Affairs Forum cross border study could be mentioned under Wales spatial plan on page 13. Amended text in italics:

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		<p>It recognises a range of interactions taking place across the English-Welsh border, especially affecting Herefordshire and Shropshire. They include: cross border service provision including shopping, health and education; transport links, including north-south links within England important for connecting Wales as a country; water and sewerage demands; rural policy; the management of river catchments and inter-dependencies in housing markets <i>and the Rural Affairs Forum cross border study.</i></p> <p>Section on Lisbon Agenda included in context.</p>
Pg11	There is a section about gypsy and travellers and a mention of migrant workers under London 2012 Olympics but it makes no mention of the existing issues related to migrant workers in the rural West Midlands.	<p>Migrant workers tend to occupy non permanent housing, this could be considered under Phase Three with gypsies and travellers.</p> <p>Amended text: <i>Gypsies and travellers will be considered in more detail in Phase Three Revision, this may include an assessment of the non permanent housing needs of migrant workers.</i></p>
Pg 13	KEY FINDINGS FROM MONITORING: says nothing specifically about Rural Renaissance and does not pick up the points about persistence of problems as identified in the contextual monitoring exercise.	<p>Affordable housing is mentioned.</p> <p>The Contextual Monitoring for Urban and Rural Renaissance report will inform the future monitoring framework of the revised WMRSS, this will explicitly pick up Urban/Rural Renaissance. See below.</p>
Pg 13	There is no mention about how far we have achieved the rural renaissance objectives of the RSS. If we have not made progress or if there is progress, it should say so. If we do not know whether there is progress or not - this too would be interesting!	<p>Add reference to key findings of the contextual monitoring report. As regards progress towards the principles of Urban and Rural Renaissance add <i>'The Regional Contextual Monitoring Report 2006 reports that in urban areas there are signs of improvement on educational attainment and levels</i></p>

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		<p><i>of crime (burglary) and in rural areas there is a good quality of life and environment.'</i></p> <p>As regards fields in which significant progress has yet to be achieved add '<i>Contextual monitoring indicates that in urban areas there are still lower levels of educational attainment than in rural areas, higher levels of deprivation and a lower quality of life. In rural areas there is still a persistence of problems including pressure from out-migration from urban areas and other parts of the Country, car-dependence, difficulties with housing affordability and continued aspirations for rural living.'</i></p>
Pg13	More emphasis should be given to the impacts and implications to the environment and rural issues.	As above.
Pg 15 Pg 16 Pg 18	<p>HOUSING: We are not convinced that the document gives the rural dimension adequate treatment. "Urban capacity" is mentioned but there is no concept of "rural capacity" - physical infrastructure constraints as well as environmental ones are likely to be a particular problem in rural areas.</p> <p>It is felt that we need to challenge the assumption of no houses except in towns. That is to say that there is an assumption that any housing development outside larger settlements is by definition unsustainable (because people have to travel to work and services). The point is that to achieve social sustainability (rural renaissance) in remoter rural areas a certain level (small numbers) of additional housing is needed. The document discusses the social impacts of additional housing on settlements (need for additional services etc.) It does not discuss the social impact of NOT building any houses in remoter rural areas (i.e. increasing gentrification, young people having to</p>	<p>"urban capacity" is a technical term that applies equally to a rural context – entry in jargon buster to that effect.</p> <p>The principles of Urban and Rural Renaissance remain unchanged by the partial revision. The Spatial Options open up for debate increases in new housing which in line with the WMRSS will be concentrated in the MUAs and the sub regional foci. The distribution of housing within Local Planning Authority areas will be through the LDF process.</p>

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	move out) (p 16/1 and 18/1). It would be good to see this spelt out.	
Pg 16	These determining factors do not cover all the elements of impacts on communities, the environment and climate change, for example the social capacity to support the households i.e. access to services, schools etc, environmental capacity and water resources and waste treatment capacity. The impacts on community will be a major issue in the rural areas. Need clearer reference to PPS3 in this section, not separately below?	The implications of the Spatial Options, including environmental and infrastructure constraints are being studied at present. This work will inform the Preferred Option. A further Sustainability Appraisal will be carried out on the Preferred Option.
Pg 16	Housing demand: Already acknowledged above, under 'Key finding from monitoring' - the RSS is already having an impact in changing the historic trends - has this been accounted for, as it would presumably make a big difference in the rural areas and finding based on historic trends would overestimate the level of demand	Projections are trend based. Sub regional and local work is underway but will take time.
Pg 16	Local Housing Market Areas: What studies have been done to consider the other factors and to ensure that these are worked into the RSS review before the SA (i.e. to build in rather than bolt on)?	The implications of the Spatial Options, including environmental and infrastructure constraints are being studied at present. This work will inform the Preferred Option. A further Sustainability Appraisal will be carried out on the Preferred Option.
Pg 18 Pg 19	HOUSING GROWTH & OVERALL NUMBERS: The section on communities on pages 18 and 19 does not appear to give recognition to rural dimensions. Improved social, health and community facilities are needed in areas other than those with "large scale new housing development". This is where Defra's Rural Strategy 2004 concept of "Social Justice for All" is so relevant. The housing section does not adequately pick up the issue of the lack of affordable housing in rural areas. There is a mention of market towns but nothing about smaller settlements other than "In the west of the Region settlements are smaller". So what is the significance of this for provision of housing for local need, sustainable communities etc.?	Text amended: Higher levels of housebuilding should enable more people to access the types of housing they need and may improve the overall affordability of housing across the Region, <i>in both urban and rural areas</i> . It will also accommodate the needs of economic migrants requiring work in the Region, see affordable housing and mix section. The principles of Urban and Rural renaissance remain unchanged by the partial revision. The Spatial Options open up for debate increases in

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		new housing, which in line with the WMRSS will be concentrated in the MUAs, however there is considerable growth proposed for the sub regional foci. The Preferred Option will set out housing figures for Local Planning Authority area. The distribution of housing within Local Planning Authority areas will be through the LDF process.
Pg 18	CLIMATE CHANGE: Suggest adding note about the impacts of energy transportation to site.	Amended text: Climate change: The amount of dwellings affects the amount of domestic energy use, therefore a significant growth in housing across the Region will have an impact on the amount of CO2 emitted. In addition building houses produces CO2 called “embodied energy” through the construction process, <i>transfer of materials to site</i> and materials used.
Pg18	It is suggested that within the environmental implications section, that it will be important to suggest that LDFs will incorporate appropriate green infrastructure proposals.	Considered relevant to LDFs but difficult to direct via the RSS.
Pg 19	RATIOS: These are unclear – the balance between MUAs and other areas depending on the option – changes in which direction?	Noted.
Pg 20	DISTRIBUTION: This section examines the impact of the various options on the urban renaissance objectives, but says very little about their impact on rural renaissance objectives.	Noted.
Pg 21	WHERE HOUSING COULD GO: Note: with the option levels are set out separately for each district, and it is not clear whether the consultation will be on the 3 high level scenarios or in relation to the spatial pattern of uptake of these 3 levels across the districts – if the latter, how will judgements be made about the complex alternative scenarios? The SA needs to provide for assessment at this level of detail and take into	The consultation invites comment on all aspects of the numbers set out, the high level numbers and the spatial distribution. Regarding the spatial distribution the Phase Two Revision is a partial revision and therefore the principle of urban and rural renaissance will continue to underpin the Preferred Option.

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	account rural and urban renaissance, and environmental, issues	The SA will consider the distribution of housing and provide a commentary on the Preferred Option.
Pg 25 Pg26	WHAT TO THINK ABOUT: has nothing to provoke thoughts on rural housing issues. There certainly is a need to update affordable housing figures (the RHS and RSS figures do not seem consistent anyway) and to attempt to disaggregate them to provide separate figures for rural areas. The situation must be getting continually worse as house prices continue to escalate and wage rates fail to keep up. Inadequate attention is given to the need for rented housing. We do not believe that substantially increasing the level of new house building will improve general affordability of houses because most houses on the market already exist (it would be interesting to see any research that does confirm the Government's belief) but since there will not be substantial increases in new house building in rural areas we really do not see how it will address urgent rural housing needs. The term "social housing" is used but not defined - it is not in the jargon buster.	The RSS will disaggregate housing numbers to Local Planning Authority area, the determination of numbers at a lower scale than this and therefore for some of the more rural areas of the Region would be impractical and inappropriate at RSS level – this is for LDFs to determine. Additional question in “what to think about” section <i>How will the distribution of housing affect rural communities and affordability?</i>
Pg 27	OTHER PARTS OF THE REGION: Smaller market towns are mentioned, but no mention of smaller rural settlements - do they not exist in housing terms?	The principles of the current WMRSS are being maintained as Phase Two is a partial revision. The intention is not to stifle rural areas however it is recognised that the current strategy is focused on delivering urban renaissance partly through housing provision in the MUAs and sub regional foci. The Preferred Option will disaggregate housing figures to LPA level, further distribution will be through the LDF process.
Pg 28	AFFORDABLE HOUSING & HOUSING MIX: in rural areas needs strengthening, particularly given the recent CRC research. Thought must be given about this in relation to our partners in Wales, as the housing decisions we take in the rural west of the region effect east Wales and vice versa.	Noted – but applies equally to all cross-regional boundary issues.

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Pg 28	Affordability - this is THE key issue in the rural areas. Yet there is no mention of the government's Affordable Rural Housing Commission report and its recommendations. Recommended that those working on the RSS take the ARHC recommendations and analyse how they can be applied in the West Midlands context - this would be a really excellent piece of rural proofing and ensure that we embed the lessons and best practice from further a field.	This something that the Rural Proofing Team could assist with during the development of the Preferred Option.
Pg 32	EMPLOYMENT: This section on seems to be totally silent on any rural dimension. It may be less significant than specific rural housing issues but the availability of local employment is an important aspect of sustainable communities and rural renaissance. In fact the whole feel of this section is that it is about big places and big developments. In fact the outside observer would probably not realise that the West Midlands had any rural areas or employment in land-based and related activities.	Employment in rural areas is addressed in many policies in the existing WMRSS, including sub-regional foci, market towns and land-based employment. These policies are not subject to partial revision but will remain part of the WMRSS. The proposed 'reservoir' approach to employment land requirements and supply applies across the Region, including rural areas.
Pg 39	REGIONAL LOGISTICS: Whilst not simply a rural issue, the main impacts are likely to be in rural areas.	Noted. No change.
Pg45	STRATEGIC CENTRES (SC7): There seems no reference to the issue of redressing the issue of major retail development on outskirts rather than centres, and the role these play in weakening the economy of the adjacent centres - putting ongoing provision of retail and other services in the centre at risk – a major issue in rural areas and their Market towns, which has linkages to provision for transport and access.	The Phase Two Revision focuses on Strategic Centres. Reference added as follows: 'Vital centres are fundamental to the achievement of Urban and Rural Renaissance. The Preferred Option will need to reflect these principles of the WMRSS. It will also have to make sure that investment into strategic centres doesn't harm smaller centres <i>including essential service centres in rural areas</i> . It must also help to regenerate vulnerable centres <i>and support vital and viable market towns within the strategic network</i> to make sure the best facilities can be accessible to all sections of the community. This relationship

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		between different centres and their functions is referred to as 'balanced network'.
Pg 50	OUT OF CENTRE OFFICE POLICY: No mention of 'out of centre' office development in rural areas - there are still examples of barn conversions etc. providing excellent locally available office space to rural businesses	Reuse of buildings mentioned under <i>What to think about</i> section.
Pg 53	WASTE: There is the possibility that this could become a problem for rural areas in terms of land fill – recognition of the importance of considering proposals at a regional level is advocated	Questions W13 and W14 address this issue.
Pg 67	ECONOMIC DEVELOPMENT OPPORTUNITIES: In the Waste section there is no mention of opportunities from agricultural waste - perhaps there should be.	Question W15 provides the opportunity to raise this.
Pg 69	TRANSPORT & ACCESSIBILITY: From a rural perspective the section on Transport and Accessibility is a non event. Five pages on Car Parking Standards (how about a rural public transport standard?!), and over another five pages on airports but nothing on rural transport. Maybe this will be covered in phase 3 but at least it ought to have a mention after all the main heading is "Transport and Accessibility".	Access to critical rural services will be covered in Phase Three. The topics contained in the Transport and Accessibility section were chosen for revision by the Secretary of State, they build on the existing Regional Transport Strategy contained within the WMRSS.
Pg 69	The section is very much based on cars. While accepting that the car is the main mode of transport in rural areas and that we need to be pragmatic about what can be achieved in the RSS, there is a need to make sure that a full regional picture is reflected and acknowledgement that transport patterns can differ, e.g. car park charges and park and rides are probably not the main transport issues in rural areas. This section has a very metropolitan/urban transport feel to it.	Strategic Park and Ride is defined as moving people to strategic destinations and major centres.
Pg 75	Concern is expressed about "three levels of public transport accessibility" with "Poor Access" defined as between 0-100 inbound buses, trams and trains in the morning peak period – totally unrealistic for rural areas and smaller towns. Perhaps a	Access to critical rural services will be covered in Phase Three.

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	"Very Poor Access" category is needed.	
Pg78	ROLE OF REGION'S AIRPORTS: Mention is made of entailing the loss of areas of Green Belt - do include also areas of conservation interest.	Noted.

Appendix 1

The Rural Proofing has been undertaken by the Rural Accord's Rural Proofing Team which was set up by the West Midlands Rural Accord and the West Midlands Rural Affairs Forum. Members of the Rural Proofing Team were:

Frances Beatty	Country Land & Business Association
Rowena Clayton	West Midlands Public Health Group
Clare Greener	Shropshire Rural Pathfinder
Alison McLean	West Midlands Rural Affairs Forum
Helena Muskett	Shropshire County Council
Elizabeth Newman	Association of Parish Councils
Malcolm Kimber	West Midlands Rural Communities Council
Mike Kinghan	West Midlands Biodiversity Partnership
Sara Roberts	Rural Accord Co-ordinator
Paul Shevlin	Shropshire Partnership
Helen Stace	Natural England
Mandy Walker	Coventry, Solihull and Warwickshire Rural Forum
Jennifer Watkins	Herefordshire Partnership

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 membership of these groups can be found on the website, www.wmra.gov.uk.