

APPENDIX

West Midlands Regional Spatial Strategy Spatial Options: Proposed Response by Dudley MBC

1. This appendix sets out further details about the issues and options identified in the RSS Phase 2 Revision Spatial Options Consultation. In addition, a draft of the full Council response in the form of a completed questionnaire has been placed in the Members' Room together with the Consultation document itself.

Revisions to RSS

2. The Regional Spatial Strategy for the West Midlands, published in June 2004, is currently being revised in 3 phases. Phase 1 deals specifically with the Black Country, and has recently been the subject of an Examination in Public. Phase 2 was launched in March 2006. It addresses a range of housing, employment, waste and transport/ accessibility issues across the whole Region, identified by the Secretary of State when the RSS was approved as needing early review.

Phase 2 Revision

Housing and Employment

3. The Revision seeks to 'balance housing growth with employment growth in order to regenerate the Major Urban Areas while fostering thriving rural communities, reducing the need to travel far, and to achieve sustainable communities and growth.' It points to the Black Country Study as an example of an integrated approach to assessing economic and employment needs alongside housing needs and capacity.

Housing

4. The Consultation invites views on:

- The level and type of new housing development across the region;
- The distribution of new housing; and
- The policy towards affordable housing;

5. The Revision re-examines regional and sub-regional housing needs and requirements and how these can best be met in the Region up to 2026, and considers local housing market areas. The latest Government household projections indicate a requirement for an additional 575,000 dwellings in the Region between 2001 and 2026 (allowing for replacement of demolished and vacant dwellings). Three Options for the overall scale of new provision are put forward, based firstly on a continuation of current RSS levels (an additional 381,000 dwellings), secondly on the advice provided by Strategic Planning Authorities (an additional 491,000 dwellings), and thirdly to meet the Government household projections (an additional 575,000 dwellings). In terms of the distribution of new dwellings, the table below sets out the implications for the Black Country and Dudley specifically.

Option	Gross additional dwellings 2001-2026			Dudley 2001-2026 - annual build rate	
	West Midlands Region dwellings	MUA/shire split	Black Country		Dudley (indicative only)
1	381,000	53/47	79,400	21,000	840
2	491,200	51/49	99,900	23,800	952
3	575,000	50/50	106,700	25,400	1,016

6. All options involve a scale of activity that is substantially greater than that in the recent past. This is consistent with the Black Country Vision to promote urban renaissance through a quantum change in the level of housing (and employment) provision through an extensive restructuring of land use. For the Black Country, Option 1 is consistent with the level of housing development envisaged in the Phase 1 Revision. The Black Country Study has, however, demonstrated that there is scope to accommodate higher levels of growth – but that this is dependent on significantly improved ‘delivery mechanisms’. Recent work on urban capacity has confirmed that the scale of development proposed in the Black Country and Dudley under Option 2 can be accommodated without green field land release. Option 3, however, could only be met in the Black Country and Dudley by the release of green field sites – which in turn could pose a threat to regeneration.

7. An important dimension to the current RSS is a planned shift in the balance of housing development in favour of the Major Urban Areas (MUAs), as reflected in Option 1. Both Options 2 and 3 begin to reverse this. They involve a greater spread of development in the shire areas including the ‘growth foci’ such as Telford and could involve green belt release around the conurbation periphery. Particularly in the case of Option 3, the scale of shift back towards development in the shire areas could lead to higher levels of out migration and represent a threat to urban regeneration and the Black Country Vision.

8. Affordable housing provision is a key element of the Revision. The Council can support the proposal to establish a regional target for affordable homes, with local level targets being fixed by local development frameworks, which in Dudley’s case will be through the Joint Core Strategy. It would not be appropriate to go below the minimum site threshold of 15 dwellings set out in the new PPS3, because of the practical difficulties in securing affordable housing on sites with high abnormal development costs.

Employment

9. The consultation invites comments on

- The amount of land to be allocated for industry, offices, warehousing and large inward investment sites; and
- The scale of new shopping and office development within and outside of strategic centres.

10. The Options paper puts forward a ‘reservoir’ approach to employment land provision, in which a rolling supply of readily available sites is maintained, together with a land bank of not readily available sites which is used to top-up the reservoir. The

proposal that RSS should establish levels of employment land to be provided is to be supported as a key step to promote urban regeneration. It would be appropriate to adopt a similar approach to that towards housing – that is, to set minimum levels in the MUAs and maxima in the shire areas. A Black Country level reservoir and back-up land bank should be established through RSS, with indicative levels for each Black Country Authority. A 5 year reservoir and 10 year land bank should ensure an adequate supply. The amount of land to be included in the reservoir and land bank requires further consideration. It is critically important that the progress of the Black Country is not constrained by an inadequate land supply in terms of either quantity or quality. The scale of provision, the types of sites and broad locations should reflect the regeneration ambitions as set out in the Black Country Study, and the revised levels of housing growth to be promoted in the Preferred Options. The Joint Core Strategy will need to develop the details.

11. RSS should give strong support for the protection of ‘best quality’ employment sites, and sites for waste management uses. Further consideration of effective mechanisms to achieve this protection should be given as part of the preparation of the Preferred Option.

12. The provision of a full range of employment development opportunities to meet the Black Country’s needs means that ‘special’ sites, identified in broad locational terms in RSS – Regional Investment Sites (RIS), Major Investment Sites (MIS) and Regional Logistics Sites (RLS) – should be promoted in appropriate locations. A gap in RIS provision exists in the West Birmingham/ South Black Country Regeneration Zone. The identification of a site to fill this gap is problematical, but the policy intention should remain. The Wobaston Road (north of Wolverhampton) MIS is well located to meet the needs of the Black Country. There is no potential to identify a RLS within Dudley.

Strategic Centres

13. The Options adopt the proposals of Phase 1 for the Black Country, emphasising that here the proposed scale of additional retail and office development is the result of an integrated package of proposals to achieve economic and population growth. This integration has not yet been achieved for the rest of the Region through the Phase 2 work, because it is dependent on decisions on the scale and distribution of new housing development, which will be informed by the present consultation.

14. The Options also propose to adopt the Phase 1 Revision proposals for new office development in the Black Country. Elsewhere in the Region, the scale of new office development proposed for Birmingham City Centre (about 500,000 square metres) far outweighs that for any other centre. By comparison, the Phase 1 provision for Brierley Hill/ Merry Hill is 160-190,000 square metres.

15. The Council should support policies to establish limits on the scale of retail and office development outside strategic centres and the use of a sequential approach, which gives preference to in-centre development, then edge of centre development, before allowing out of centre development. The intention to establish size thresholds for development proposals to be referred to the Regional Planning Body should similarly be supported as being in the wider interests of ensuring vitality and viability of centres and regeneration.

Regional/ Large Casinos

16. The Consultation invites views on the policy to be adopted towards the location of regional and large casinos. The proposed intention to assess proposals in terms of their contribution to urban renaissance is to be supported, as is the proposition that they should be located within town centres wherever possible.

Waste

17. The RSS has to guide the shape of waste management in the Region in accordance with the waste hierarchy, setting out the distribution of waste tonnages that have to be managed, the pattern of waste management facilities of national, regional and sub-regional significance, and supporting strategic policies. The consultation seeks views on:

- The scale and distribution of facilities required for the management of municipal waste, taking into account established targets for diversion from landfill and the scale and distribution of new housing development;
- The targets for diverting commercial and industrial waste from landfill by recycling and recovery and facilities required;
- The need for additional landfill capacity to cope with residual waste;
- The mechanisms for identifying and safeguarding sites for waste management use;
- Sites for hazardous waste management;
- The need to encourage further recycling of construction and demolition waste; and
- Policies to promote sustainable waste management in new development.

18. The principle that each WPA, or sub region (e.g. the Black Country), should manage waste in accordance with the Waste Hierarchy can be supported. The wording allows for the possibility that some Waste Planning Authorities or sub regions will be unable to manage certain types of waste within their areas. The proposal to meet requirements by safeguarding and expanding existing sites, and the proposed criteria to guide the allocation of additional sites, can also be supported, but the practical difficulties need to be recognised. In particular, waste management may be a B2 or 'sui generis' use and it may not be practical to allocate sites for exclusively waste management use (a revision to the Use Classes would help in this respect). Allocations can be vulnerable to proposals for alternative uses with higher land values. It will be necessary to ensure that the assessment of need for employment land takes explicit account of waste management requirements, and to monitor take-up carefully to ensure that a choice of appropriate sites is always available.

19. RSS will set the tonnages of municipal and commercial/ industrial waste to be managed in each area, and development plan documents will be required to make the appropriate scale of provision. The Options assume that municipal waste is diverted from landfill in accordance with Government targets. The amount of municipal waste to be managed will depend to some extent on the amount of new housing development, which will be determined through the RSS Phase 2 Revision. Regarding commercial/ industrial waste, different levels of diversion from landfill are put forward for consideration. In principle, the Council should support the maximum practicable level of

diversion from landfill; this is consistent with a strategy which increasingly regards waste as a resource to be reused. The Council has little influence over the way in which commercial/ industrial waste is managed. Nevertheless, at the very least plans should be based on the more demanding levels of diversion from landfill anticipated in the forthcoming National Waste Strategy (Option b).

20. The Black Country makes a significant contribution to the Region's capacity to treat hazardous waste. It would be appropriate to take all reasonable steps to safeguard existing treatment facilities and any scope they may have for expansion. There is at this stage insufficient evidence to assess the need for additional facilities for this waste stream. Regarding construction and demolition waste, this is a very significant waste stream for the Black Country in view of the scale of redevelopment of brownfield land that is required to deliver the regeneration strategy. The Council should give strong support for in-situ recycling on larger sites and the 'urban quarry' concept (in effect, a network of modern, well-managed construction and demolition centres that recycle waste for use as secondary aggregates) to assist with the implementation of the regeneration agenda.

21. The Consultation proposes to restrict new landfill provision to situations where there is an established local deficiency, and where landfill is essential to reclaim minerals workings. This can be supported as being consistent with the waste hierarchy which sees landfill as a 'last resort'.

Transport/ Accessibility

22. The consultation seeks views on

- The distribution of strategic park and ride facilities across the region;
- Regionally specific car parking policies;
- Road user charging;
- The role of the Region's airports; and
- (Possibly) the priorities for investment set out in Policy T12 of RSS.

23. The Council has been supportive of the principle of Strategic Park and Ride but has significant concerns about the possible location at Quinton M5/J3. There are three potential sites in the area, all of which have major problems and would be problematical to promote. It is generally accepted that a P&R facility at these locations would be serviced by a major public transport link to the city centre i.e. Metro as proposed in Phase 2 of Metro network development.

24. We are well advanced with developing local standards in particular through a Supplementary Planning Document supporting development control. Again, in principle Dudley are supportive of the approach, though some of the details need to be clarified.

25. Regarding road user charging, it would not be appropriate to make any significant changes to RSS until the outcome of the Transport Innovation Fund work is known. Finally concerning the role of the Region's airports, it is proposed to revise the RSS in accordance with the Air Transport White Paper – supporting the expansion of Birmingham International Airport, opposing any further expansion at Coventry, and maintaining the role of Wolverhampton. The Council may wish to support these proposals.