

Dudley MBC Response to Phase 2 of the Revision to the West Midlands Regional Spatial Strategy (RSS) Preferred Option (December 2007)

1. In general Dudley MBC supports the proposed Phase 2 Revision to the RSS as set out in the Preferred Option Document (December 2007). Detailed comments on specific aspects of the document are set out below as follows:-

Communities for the Future

Policy CF1: Housing within the Major Urban Areas

2. Dudley MBC is supportive of this policy as it encourages Urban Renaissance in the West Midlands Major Urban Areas (MUAs). This policy is also in line with the objectives of the Black Country Core Strategy which seeks to encourage higher density housing development in its strategic centres and the regeneration corridors that connect them.

Policy CF2: Housing Beyond the Major Urban Areas

3. The key issue with this policy is that development in these areas may be considered more attractive to developers than more problematic urban areas and therefore they could attract housing development away from the MUAs thus undermining the RSS and BCS visions for Urban Renaissance.
4. Notwithstanding the above it is considered that if development is phased properly it could be accommodated beyond the MUA without conflict. This is an important issue if the regeneration and growth of areas of the Black Country are not to be undermined.

Policy CF3: Levels and Distribution of New Housing Development

5. It is considered that the Black Country Authorities could meet the demands set out under Policy CF3 of the RSS relating to New Housing Provision. It is also regarded that this option represents the most appropriate level of new housing development for the sub-region as it mirrors the detailed work taking place as part of the Black Country Joint Core Strategy. This level would ensure growth and regeneration in the Black Country without putting development pressure on greenfield / greenbelt land.

Policy CF4: Phasing of New Housing Development

6. The phasing policy is welcomed and supported as it seeks to ensure that higher levels of development are completed in the MUAs earlier in the plan period (thereby ensuring that developers will take forward the more problematic urban sites before seeking to develop the more attractive sites outside of the MUA). It is very important that this policy is applied strongly

to ensure the regeneration and growth of areas of the Black Country are not to be undermined.

Policy CF5: The Re-Use of Land and Buildings for Housing

7. The policy advocates allocating sufficient housing on previously developed land to ensure protection of the Borough's environmental assets and promote economic regeneration and therefore is supported. The 85% PDL target for the West Midlands Conurbation is seen as a useful target to ensure that the preference for brownfield land is adhered to where possible.

Policy CF6: Making Efficient Use of Land

8. The Joint Core Strategy for the Black Country promotes high density housing development in the four strategic centres and the housing led regeneration corridors that connect them. On this basis Dudley is in full support of higher density housing developments within and close to strategic town centres and in locations close to public transport interchanges.

Policy CF7: Delivering Affordable Housing

9. Dudley MBC is supportive of the approach to delivering housing that is set out under Policy CF7 of the draft RSS. The policy contains 'Housing Market Area' targets for achieving affordable housing rather than district or local level targets. This is welcomed as it is felt that these targets should be determined by the individual authorities, who have better knowledge of local needs and distinctiveness, rather than at regional level.

Policy CF8: Delivering Mixed Communities

10. In line with PPS3 the policy requires local authorities, using evidence from Strategic Housing Market Assessment, to set out in their Local Development Documents the general mix of types of accommodation that they need to build in a particular area. This approach is supported as it allows slightly more flexibility than setting specific targets which have to be met.

Policy CF9: Sites for Gypsies and Travellers

11. No change to policy from existing RSS policy – to be dealt with under the Phase III revision of RSS.

Policy CF10: Managing Housing Land Supply

12. The approach to managing housing land provision is consistent with the guidance set out in PPS3 and therefore is considered acceptable. In managing the provision of housing land the policy seeks to secure the development of brownfield land first which is welcomed. The policy also

seeks to ensure that local authorities take account of potential housing land provision and the policy framework in adjoining local authority areas so as not to undermine urban renaissance in their areas. This is beneficial for a Borough like Dudley, which adjoins the boundary of a rural authority, as the release of greenfield land may be seen as more desirable to developers than the more complex brownfield land in the MUA.

13. Finally the policy recognises the importance of windfalls, particularly in the MUAs. The policy justification accepts that there are circumstances within the West Midlands which require an acknowledgement of the important role of windfall sites in future land supply contrary to the general advice in PPS3. Such sites make a vital contribution to urban renaissance and encourage patterns of sustainable development without the need for urban extensions. This policy stance is welcomed by Dudley.

Prosperity for All

Policy PA6A Employment Land Provision

14. Dudley considers it important that an employment land reservoir is set out in the RSS at a Black Country level. The four Black Country Authorities are currently working together on a Joint Core Strategy which is to apportion employment land requirements between the four authorities to reflect the RSS Black Country figure.
15. It is important that the amount of land to be included in the reservoir needs to be regularly monitored in order to reflect an integrated approach to the planning of housing and employment needs in each area. It is critically important that the progress of the Black Country is not constrained by an inadequate employment 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 to be set out in the Black Country Joint Core Strategy and the revised levels of housing growth promoted in the RSS Revision.

Policy PA7 Regional Investment Sites (RIS)

16. The identification of a site to provide a RIS in the West Birmingham and South Black Country Regeneration Zone (of which Dudley is a part) is welcomed although it is recognised that the specific identification of such a site is still to be considered.

PA11 The Network of Town and City Centres

PA12A Comparison Retail Floorspace Requirements

17. Dudley MBC agrees with the places listed in the network of strategic town and city centres identified in proposed Policy PA11. However, the value of the division of the network of centres into four tiers is questionable, particularly as it could be argued that each centre has a differing role. The

text in Para 7.56 states the tiers are not intended to impose a formal hierarchy but the tier system may naturally lead people to that assumption.

18. Each centre has different additional comparison retail floorspace and office floorspace requirements set out in PA12A and PA13A. This shows vastly differing floorspace requirements within each tier but also, in some cases, a centre in Tier 3 or Tier 4 having higher floorspace requirements than a centre in a higher tier bracket.
19. Given that Birmingham's role is firmly established and protected by Policy PA12 it would seem to be better to have a network of:
 - Birmingham
 - Strategic Town Centres in the Major Urban Areas
 - Town & Cities outside the Major Urban Areas
20. This would be a better fit and would reflect economic regeneration priorities and the population and household growth of the urban areas in line with urban renaissance strategy running through the RSS.

Policy PA13A Office Development

21. Para 7.82 in the supporting text to this Policy states that if strategic centres have capacity constraints to accommodate levels of office development identified, then office development should be located in sites in edge-of-centre locations. However it may be preferable, in such circumstances, to locate office developments in other town centres within the Local Authority boundary. This would be sequentially preferable than accommodating office development in edge of centre locations.

Quality of the Environment

Policies W1- W5 Waste Strategy and Waste Management

22. From a waste perspective, the document can be broadly supported in that it reflects national planning policy guidance (notably PPS10 'Planning for Sustainable Waste Management') and holds a similar planning policy approach to that given in the 4 Black Country authorities' Joint Core Strategy (Preferred Options, March 2008).
23. Policy W1 requirements are similar to those set out and expanded upon in the Black Country's Joint Core Strategy (Preferred Options, March 2008) Core Policy Areas 41, 42 and 43 (pages 107 to 117), and can thus be supported. The same holds true for the RSS requirement to safeguard and or expand existing suitable waste management facilities (Policy W4), and to provide sufficient new facilities as may be required (Policies W1, W2, W3).

24. Paragraph 8.84 identifies that the municipal 'diversion' figure is calculated using the proposed housing figures in Chapter 6 and Defra's LATS allowance allocated to each Waste Disposal Authority (WDA). Although this approach can be supported in principle, the proposed housing figures may increase in line with challenges being made by the Government to the existing figures. If this is the case then the stated waste diversion and apportionment figures must be sufficiently flexible to accommodate increased housing numbers.

Transport and Accessibility

Policies T1-T12 Transport and Accessibility

25. These Policies represent the Regional Transport Strategy (RTS). The RTS provides the strategic framework for regional and local transport planning in the West Midlands.

26. The West Coast Main Line and M5 which pass within the borough have been identified as key transport corridors and the RTS supports the objective of maintaining and managing them as part of a national and international network. It is recognised that the bus will continue to be the main public transport mode within the conurbation complemented where appropriate by LRT and heavy rail services. Demand for highway space will need to be managed particularly at peak periods and some targeted highway schemes are going to be necessary to support regeneration.

27. Delivery of the RTS will require action by a wide range of partners including local and regional agencies, transport providers and local communities. Priorities for investment include Active Traffic Management for the M5, Rail Capacity improvements to the West Coast Main Line, Quality Bus Networks, Metro Wednesbury to Brierley Hill, Strategic Park and Ride and general transport network improvements.

28. Overall, Dudley MBC therefore supports the proposed wording of the Transport and Accessibility policies within the Revision Document to give us the regional planning steer to carry out our priorities for investment. It provides a strategic anchor point for the development of schemes and initiatives and is an important key to unlocking RFA funding from Government.

Government Study by Nathaniel Lichfield and Partners (NLP) – Investigation of areas where additional housing could be accommodated in the West Midlands Region.

29. Dudley MBC continues to formally support the Housing figures in Policy CF3 in the Preferred Option Document. These figures were carefully formulated to provide the right balance of housing distribution across the

Region to maintain the Urban and Rural Renaissance Strategies and best enable the regeneration of areas such as the Black Country.

30. The Study does not propose any further housing growth in the Black Country over and above what is required in the Preferred Option of the RSS. However, there are concerns that the increased figures, and particularly the distribution of those figures in the Study, has the potential to undermine the strategies which currently prevail in the RSS. In particular, the increased housing numbers proposed in the Study for the south-east of the conurbation centred around Solihull, parts of Warwickshire and Worcestershire have the potential to undermine the growth and regeneration of the Black Country and the remainder of the City Region.
31. Dudley MBC would therefore like to ensure that, if this distribution of housing was to occur, careful phasing of housing development was put in place within the RSS to ensure that housing growth and regeneration in the Black Country and other parts of the City Region was not undermined.