

## Sub-Matter 4A

### Statement on behalf of West Midlands Planning & Transportation Sub-Committee

- 1 The Sub-Committee supports the statement submitted by the Regional Assembly on Matter 4 and wishes to make only limited additions to its own December 2008 submission on this matter.

(i) **Phasing of housing**

**Is the approach to phasing and release of land in Policy CF4 necessary to support the spatial strategy and urban renaissance? Will it enable the most sustainable form of development?**

**Will it enable additional housing to be brought forward at the rate required to deliver the RSS provision? Is greater flexibility needed, for example over the timing of development on land released from the green belt?**

**Are the criteria clear, and is the implied sequential approach to land provision consistent with current guidance in PPS3? Should the RSS include other criteria such as the availability of infrastructure?**

- 2 The Sub-Committee strongly supports Policy CF4 as it seeks to ensure early delivery of Urban Renaissance. The policy is essential if a balance is to be struck between the delivery of historically high rates of house building in the Region as a whole, and the underlying and fundamental objective of achieving continuing Urban Renaissance within the MUA, through maintaining the current momentum of relatively high MUA completions, compared to the non-MUA.
- 3 The Sub-Committee considers that the Policy's phasing schedule itself will need to be reprofiled for a number of reasons. Firstly, current delivery is below trajectory as set out in the Policy. Secondly, changing circumstances have occurred since the Policy was drafted. Primarily, the economic downturn has resulted in lower completion rates, requiring a backloading of delivery targets.
- 4 Such a revised trajectory must continue to reflect the MUA/ex MUA real rates of housing completions, to ensure accelerated delivery of the Urban Renaissance. However, it is essential to note that any fundamental change to the level or distribution of housing itself is likely to adversely affect the ability to prioritise early delivery of Urban Renaissance and therefore undermine the underlying strategic objective.

- 5 Once market recovery commences, it is considered inevitable that there will be pressure to release sites outside the MUA to act as a market stimulus. This is especially true of greenfield sites in these locations. Such sites are likely to be generally easier to develop in terms of site characteristics/requirements and to be located in more “attractive” housing market locations.
- 6 There is a clear danger, therefore, of providing the development industry with the opportunity to “cherry-pick” development locations, especially in the early years of any recovery. The Sub-Committee considers that the excessive and untimely release of ex-MUA land would exacerbate this danger, with results that could be potentially fatal to the objective of Urban Renaissance.
- 7 A robust phasing approach, which is capable of effective monitoring and implementation, is essential if early delivery of Urban Renaissance is to be achieved. The Sub-Committee is of the view that Policy CF4, with an updated trajectory, provides such an approach.

**(ii) Re-use of land and buildings for housing and the efficient use of land**

**Does the approach contained in Policy CF5 add significantly to national guidance?**

**Are the percentages for development on brownfield land given in the policy appropriate and achievable?**

**Does Policy CF6 on efficient use of land and density of development add anything regionally specific to national planning policy? Is more guidance on these matters needed at RSS level?**

- 8 The Sub-Committee supports the submissions of the Regional Assembly in this matter.

**(iii) Managing housing land supply**

**Is Policy CF10 for managing housing land supply necessary and consistent with national guidance in PPS3? How does it relate to Policy CF4?**

**Is the approach to windfall development acceptable within the West Midlands context, and does it provide appropriate guidance for LDDs?**

- 9 The Sub-Committee supports the submissions of the Regional Assembly in this matter.

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