

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
6.1	Introduction	CEMEX	515	4057	Object	Chapter 6. Stratford on Avon is not considered within the WMRSS to be an MUA, however, the recently published Development of Options for the West Midlands RSS Report proposes Stratford on Avon to be one of the locations which could accommodate growth above Preferred Options level increasing the figure from 5,600 to 10,100 dwellings over the plan period. CEMEX supports the Development of Options Report's suggested increase in housing figures for Stratford on Avon and considers that the WMRSS should incorporate this figure at the next document stage. CEMEX owns a site at Long Itchington and consider it would provide suitable residential land to assist with the delivery of Stratford on Avon's anticipated housing requirements, and in particular affordable housing. CEMEX also own a site in Lichfield District and consider that it could also provide suitable residential land to help achieve the 8,000 dwellings requirement.
6.1	Introduction	Bluemark Developments Limited	579	2633	Object	Paras 6.1-6.6. These paragraphs need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						introduction.
6.1	Introduction	Broadway Trust	652	3607	Object	Chapter 6. The Broadway trust is a civic society which has as its rationale, the conservation of this beautiful village and its welfare as a sustainable community. Concern about the proposals can be summarised as:- The assumptions about housing numbers ignore the substantial numbers of empty properties and those bought as purely to-let or as second homes, which take a significant proportion of houses in rural areas;- The proportion of dwellings proposed for rural areas will jeopardize greenfield sites to the detriment of the countryside;- The proposals to place relatively large numbers of houses in rural villages will create major problems as many villages already have overstretched infrastructures and public facilities, yet there is little belief that infrastructure improvements will precede building;- It would be more sensible to have purely local consultation on the number and type of houses that each community could sustain, rather than impose, centrally, what appear to be arbitrary figures in ignorance of local requirements.
6.1	Introduction	Solihull Metropolitan Borough Council	429	1192	Support	Chapter 6: Strongly support the Communities for the Future policies.
6.1	Introduction	FLP Limited	446	1790	Object	Paras 6.1-6.4. Even without the additional dwellings up to 80,000 homes which may form part of the adopted policy the only way in which the current requirement and the increase in provision can be delivered with some certainty is by a

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						proportionate spread between not only MUAs but also sub-regional growth points and other large settlements. It is our opinion that a ratio closer to 1:1.25 between the MUAs and other large settlements is likely to be required in meeting the regional housing targets. The Plan only identifies Nuneaton as a large settlement; we believe it should be considered as a Sub Regional Foci for Development; it is incongruous that the Draft does not so identify Nuneaton, given the clear potential for sustainable development that it offers.
6.1	Introduction	Metcalf, Ms B	428	4075	Object	Chapter 6. Surprised that the housing numbers and locations seem to be conceived in isolation from the location of employment whereas the two need to be conjoined if they are ever to be sustainable long term. The issue is how serious are we about sustainability? If we do care about it we will ensure that a sizeable proportion of our new building will place workplaces within walking distances and cycling distance of homes. Rather than expanding medium size towns with peripheral housing and industry, so that they inevitably become congested with criss-crossing motor traffic, when towns have reached an optimum size, further development should be restrained and focussed on smaller settlements with the capacity to grow within the limits of what is easily walkable.
6.1	Introduction	Bloor Homes (3)	565	2451	Object	Paras 6.1-6.6. These paragraphs

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	Conder Developments	594	2838	Object	Paras 6.1-6.6. These paragraphs need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	I M Properties	156	493	Object	The figure of 19,000 new dwellings per annum is below what the Government is seeking and the figure should be increased to more closely accord with the latest household projections. Based on the earlier work of the NHPAU and more recently published 2006 Based Sub-National Population projections (June 2008), the overall shortfall is much more substantial than the 16,000 dwellings referred to in the Housing Background Paper (Amended) (Jan 2008, WMRA) and is now more likely to be of an order closer to the 80,000

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						addressed in recent NLP Study.
6.1	Introduction	King, Dr P	282	954	Object	The whole housing chapter is based on flawed economic assumptions and needs to be completely thought through again.
6.1	Introduction	QinetiQ	406	2205	Object	Paragraph should specifically refer to 2004-based Household Projections and the NHPAU advice in relation to the region's recommended target range. Amend final sentence to read: "...19,000 new dwellings (net) per annum (2004-based Household Projections). However, the National Housing and Planning Advice Unit has suggested that the Region's target range should be between 19,000 and 22,600 net additions per annum to address issues of housing affordability.
6.1	Introduction	Persimmon Homes	591	2679	Object	Paras 6.1-6.6. These paragraphs need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	WM Planning & Transportation Sub Cttee	443	3382	Object	Chapter 6. Need to ensure that references to "Metropolitan Area"/ West Midlands Conurbation are consistent.
6.1	Introduction	Shrewsbury Town Centre Residents Association	440	3983	Object	Chapter 6. The proposals for the Shropshire and in particular the rural and urban areas of the Shrewsbury and Atcham Borough Council need to

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						take into consideration the nature of the likely infrastructure and opportunities for employment in deciding how many dwellings can be accommodated to provide a sustainable community. The current proposals of 1900 new dwellings in the area are acceptable, but the emphasis needs to be on affordable dwellings, especially family homes and especially in the rural areas. Fear that the figures for Telford & Wrekin Council will be criticised and that suggestions will be made to spread the load to the area of the new unitary area, Shropshire Council, and this needs to be resisted. To accept the more recent Government pressures and yield to its demand might be most unwise, since it could lead both to unsustainable communities and to sterility of large areas of the country because they had been granted planning permission for dwellings which no-one wants to develop. The current figure of 1900 for Shropshire Council should remain on the grounds that it is achievable with the current infrastructure and employment prospects and that it is desirable especially for affordable housing in the rural areas.
6.1	Introduction	Ropewalk Projects Limited	595	2884	Object	Paras 6.1-6.6. These paragraphs need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	North Tewkesbury Land Consortium	574	4064	Object	Chapter 6. Strategy under provides by 82,400 dwellings for the region over the plan period. Regional requirement of 448,000 (22,400 dpa) proposed. Suggested that preferred option strategy is based on flawed evidence that is disproportional to both the overall requirement for the region and a distribution based upon true capacity, need and demand. Inequalities of approach will result in neither Urban nor Rural Renaissance.
6.1	Introduction	Davidsons	564	2281	Object	Paras 6.1-6.6. These paragraphs need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	Catesby Property Group	567	3186	Object	Scale of new housing required for the region is considerably higher than the 19,000 net dwellings stated.
6.1	Introduction	Forestry Commission West Midlands Region	397	3323	Object	Chapter 6. Strongly advocate the need to protect our natural assets, in particular all Ancient Woodlands in the region which are frequently under threat from land use changes and new development and must be protected. Trees and woods have a

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						vital role to play in delivering sustainable development and construction through helping create an attractive setting for development and enhance connected natural spaces (green infrastructure). Recommend that green infrastructure should be an integral part of all proposals for new housing development and delivered to the highest standards. Products from trees and woods can reduce the carbon footprint of communities through use for fuel (and substituting for fossil fuels) and low carbon building materials.
6.1	Introduction	Campaign to Protect Rural England (Worcs)	345	3279	Object	Justification for step change in housing provision is false - has been shown that this driven by credit issues not availability of houses.
6.1	Introduction	Allesley & Coundon Wedge Conservation Society	391	3913	Object	Chapter 6. The only justification given for the Preferred Option of 365,600 new homes is as a response to the Government's objective of 3 million new homes by 2020. The document fails to present a case based on analysis of specific regional demand and informed demographic projections. Recent events in the financial markets have clearly shown that high house prices owe more to oversupply of credit than to a shortage of supply. Overprovision, with its destructive effect on the Greenbelt and on existing communities, cannot be reversed. The evidence now available suggests that planning for 365,000 new homes is a grossly unrealistic overprovision.
6.1	Introduction	Barratt Strategic Land	593	2777	Object	Paras 6.1-6.6. These paragraphs

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	Goss, Ms G	372	3885	Object	Chapter 6. General objection to level of housing proposed. Suggested that there is a surplus of housing and that demand is reducing. Concern expressed about limited consideration of infrastructure requirements.
6.1	Introduction	Styler, Mrs J	88	293	Object	Government policy is for people to live in a community 'where they want to live'; how do they know that is Redditch?
6.1	Introduction	Burton upon Trent Civic Society	269	780	Object	We reject the assumptions on which the projections for housebuilding have been made. We regard the assumptions as questionable, especially those concerning inward new migration from other countries and possibly even those concerning household formation. There is already evidence that inward migration has slowed down. The economic downturn may accelerate that decline whilst households may be less able to afford to splinter into smaller units. We do not accept the rationale behind the higher total housing figures suggested in the Preferred Option than that projected by the CLG Feb 2008 revised 2004-

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						based projections for the West Midlands as a whole or for East Staffordshire in particular.
6.1	Introduction	CEG Developments	677	2930	Object	Paras 6.1-6.6. These paragraphs need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	Everitt W M	546	4005	Object	Raise objection on Chapter 6 paragraph 6.23, Policy CF3, and the proposed allocation in Table 1 of 4900 new homes for the Malvern Hills District plus part of the 7,300 new homes overflow from Worcester City. Reasons for objecting are:- the estimated "natural increase" for the District in the period 2006-2026 is only 300 houses whilst the balance (i.e. 4,600 houses) is for inward migration. This level of inward migration is excessive and must certainly have a major impact on the characteristics of existing community;- note f of Table 1 proposes 7,300 new houses (from Worcester City's allocation) should be provided in either the Wychavon or Malvern Hills districts. The South Worcestershire Joint Core Strategy Options paper is currently proposing that more than 6000 of these new houses will be in the Malvern Hills

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						District. It is proposed that all 10900 plus new houses will be west of the River Severn and therefore will require extensive and expensive road and rail infrastructure improvements to the system that is already severely congested;- Little consideration has been taken of the terrain features of Malvern nor that a significant area around the Malvern Hills themselves are an AONB. The practical impact of the local terrain means that the houses will have to be concentrated in substantial numbers largely to the north and/or east of the Malvern Hills and this will inevitably impact on the views to and from the AONB and the setting of the Hills.
6.1	Introduction	National Housing Federation	562	3863	Object	Chapter 6. Spatial distribution of housing development. Despite emphasis on sustainability, RSS does not explicitly state that settlements should be provided with a future housing supply that is commensurate with whatever growth is needed for sustainability. Policy opposes housing development outside of MUA when it would undermine urban renaissance within them. It does not however provide the means to identify what this actually means in practice. Re investment of public resources for regeneration, there is a need for a balanced judgement. RSS should not seek to reverse net migration out of MUA as this would be disadvantageous for other areas. There is a need to spell out more clearly how interventions in housing market renewal areas are to be

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						integrated and coordinated with those in the rest of the region. There are hints of a conceptual hierarchy of settlements but not clear. Policy guidance for achieving housing through conversions and pdl appears incomplete and inconsistent.
6.1	Introduction	Staffordshire Moorlands District Council	513	1111	Support	Chapter 6: The provision of 6,000 dwellings over the period 2006-2026 accords pro-rata with the Council's request at Spatial Options stage for 7,500 over the period 2001-2026. Subsequent work and evidence for the Core Strategy supports this as a realistic development rate. The WMRSS affordable housing targets are considered capable of being delivered through the Core Strategy in so far as they affect SMDC. The use of windfalls to ensure that housing land supply is maintained is also consistent with the Core Strategy. Local authorities should be able to propose individual targets as a minima within their LDFs and this is now reflected in the WMRSS review.
6.1	Introduction	CALA Homes (Midlands) Limited	592	2729	Object	Paras 6.1-6.6. These paragraphs need to be rewritten in order to bring them up to date with the required level of housing that will need to be provided in the West Midlands in accordance with more recent projections. There has been no evidence produced which shows that development on Greenfield sites undermines the process of urban renaissance and this reference should be removed from the introduction.
6.1	Introduction	Ramblers Association	395	3337	Support	Chapter 6. Support policies in this

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
		(Worcs)				section which aim to reduce out-migration from the MUAs since this would preserve virgin countryside especially around the modest urban areas.
6.1	Introduction	Shrawley Parish Council	133	328	Object	Since the beginning of 2007 there have been a number of projections published for UK population growth, which obviously impacts upon the demand for housing. We believe it is even more important that there is a detailed understanding of the underlying demand forces which are generating the need for additional dwellings over the next 20 years. The recent Ministerial request underlines the 'predict and provide' philosophy.
6.2	Introduction	Bromsgrove District Council	492	1269	Object	Consider that the statement "excessive development on greenfield sites outside the MUAs could fundamentally undermine the process of urban renaissance" should be reconsidered as housing allocations will lead to such excessive development
6.2	Introduction	Redditch Borough Council	653	1652	Object	No comparisons should be made between Telford and Redditch in terms of ability to accommodate future growth.
6.2	Introduction	J S Bloor (Tewkesbury ) Limited	661	3693	Object	Object to the reference to excessive development in greenfield sites outside the MUAs undermining urban renaissance. This ignores the legitimate development needs of the settlements beyond the MUAs and the overall context of the spatial strategy.
6.2	Introduction	Redditch Borough Council	653	1649	Object	RBC wishes the EiP to consider the statement "Excessive development on greenfield sites outside the MUAs

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						could fundamentally undermine the process of urban renaissance" in light of Redditch's SSD designation. Considered that such designation can only undermine the urban renaissance objective.
6.2	Introduction	Bromsgrove District Housing Trust	458	1890	Object	This paragraph fails to reflect the important role that urban extensions will play in achieving the increased level of growth at MUAs (and which will entail the use of greenfield sites) advocated by NLP Study. It is important that the text is reworded to give a positive emphasis to such development.
6.2	Introduction	Campaign to Protect Rural England (Worcs)	345	3280	Support	It is correct to say that excessive development on greenfield sites outside of MUAs could fundamentally undermine the process of urban renaissance - unfortunately this is happening in Worcestershire where at least 60% of new homes will be on greenfield sites.
6.3	Introduction	Brown, Mrs	675	3249	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	Land & Leisure Limited	670	3132	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	QinetiQ	406	2206	Object	Para should acknowledge evidence contained in GOWM housing options study (NLP October 2008). Delete paragraph and replace with: "It will not, however, be possible to concentrate all of the required level of new housing development within the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						MUAs due to capacity constraints, as confirmed through Government commissioned research (Nathaniel Lichfield and Partners Housing Options Study). Provision will therefore need to be made on sites adjoining the MUAs, within and adjoining existing other settlements and/or through the development of new settlements. It will be necessary for LDDs to assess the sustainability of each of these options in meeting the required levels of additional housing set out in Policy CF3 and Table 1. The Government commissioned research suggests that additional housing provision beyond the MUAs need not harm the achievement of Urban Renaissance".
6.3	Introduction	Shrawley Parish Council	133	339	Object	The need for most if not all villages to have some growth, however limited, is reiterated; failure to do so will see the decline of communities.
6.3	Introduction	Glebe Committee	668	3113	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	Styler, Mrs J	88	294	Object	Who are the houses for?
6.3	Introduction	Tidbury Green Residents Association	75	257	Object	The proposed approach of the WMRSS providing a regional target and the local planning authorities to provide local targets through the local development framework process is too heavy handed and does not allow engagement with local people and the ability to respond to changing need and circumstances. The approach should encourage dialogue with the local authority to develop a bottom-up

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						demand driven target that is acceptable to local people.
6.3	Introduction	St Modwen Developments Limited	266	719	Object	The strategic approach towards directing growth outside MUAs to Settlements of Significant Development (SSD) is supported but for clarity and consistency it is essential that emphasis is placed on SSD throughout the document. For example, in paras 3.5a); 4.5; Policy UR2 and para 6.3. Whilst there should be a particular focus on directing development to the SSDs, other settlements and surrounding areas that serve them should not be overlooked as locations for appropriate development.
6.3	Introduction	I M Properties	156	494	Object	In certain locations this approach is not applied subsequently in the formulation of policy and proposals and its principle is certainly not applied and followed in the case of North Warwickshire Borough where the housing proposals do not even prove adequate to meet locally generated needs. This anomaly and omission should be rectified.
6.3	Introduction	Church Farm Trust	673	3224	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	Hickman Stanmore Limited	666	3088	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	Newpool Construction Limited	671	3203	Support	Recognition that there should be a spread of development with allocations to a range of settlements

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						including market towns and rural areas is fully supported.
6.3	Introduction	Bryan, Mr M	672	3213	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	Brooks, Mr P	669	3123	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	Grant-Nicholas, Mrs S	674	3238	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.3	Introduction	Midland Commercial Properties	667	3099	Support	Recognition that there should be a spread of development with allocations to a range of settlements including market towns and rural areas is fully supported.
6.4	Introduction	Kenilworth Town Council	270	823	Object	Regret that effect of different sizes and types of dwellings is totally ignored.
6.5	Introduction	Catesby Property Group	567	3187	Support	Warmly welcome the idea of co-ordination between public and private sector interests in delivering housing within the region.
6.5	Introduction	I M Properties	156	495	Object	The approach proposed in this paragraph is not carried through in relation to North Warwickshire Borough where the housing proposals do not prove adequate even to meet locally generated housing needs. West Midlands C2 HMA - Strategic Housing Market Assessment 2008 Final Report (April 2008) indicates the affordable housing need situation is such in N Warwicks Borough that

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						greater provision is required at 200 affordable dwellings pa than the current RSS figure of 132 dwellings pa. As in N Warwicks Borough the situation of under provision compared with housing need in the adjoining area of Tamworth Borough appears to be repeated. It seems a significant problem is being ignored within these two adjoining LA areas and amendments are needed to the individual authority housing targets and that a co-ordinated approach is undertaken crossing boundaries to address the overall situation in the most effective manner.
6.5	Introduction	Brown, Mrs	675	3250	Support	Recognition that provision in an adjoining authority may provide the most sustainable form of development is fully supported. Cross boundary working should be supported to ensure that when considering alternative options for expanding existing settlements the most sustainable solutions are adopted, whether that be development within or beyond administrative boundaries.
6.7	Housing within the Major Urban Areas	Persimmon Homes	591	2680	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.
6.7	Housing within the Major Urban Areas	Bloor Homes (3)	565	2452	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.
6.7	Housing within the Major Urban Areas	CALA Homes (Midlands) Limited	592	2730	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.
6.7	Housing within the Major Urban Areas	Conder Developments	594	2839	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
6.7	Housing within the Major Urban Areas	Davidsons	564	2282	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.
6.7	Housing within the Major Urban Areas	Ropewalk Projects Limited	595	2885	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.
6.7	Housing within the Major Urban Areas	Barratt Strategic Land	593	2778	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.
6.7	Housing within the Major Urban Areas	Government Office for the West Midlands	500	1170	Object	Would be beneficial to refer to the Urban Renaissance chapter given the references to the need to provide a more attractive choice of homes and community environments in order to support urban renaissance.
6.7	Housing within the Major Urban Areas	CEG Developments	677	2931	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in the RSS.
6.7	Housing within the Major Urban Areas	Bluemark Developments Limited	579	2634	Object	Paras 6.7-6.9. It should be acknowledged that in providing an appropriate choice of housing necessary to secure more balanced populations that will support the renaissance of the MUAs and sustain other settlements within the Region, a range of locations will need to be concurrently planned for. The overall scale of housing need and demand related to the MUAs inevitably means that land will need to be provided to meet housing requirements on the edge of MUAs. It is important for this RSS Revision to explicitly refer to this point. In particular it is considered that around the West Midlands MUA there is a clear need for Sustainable Urban Extensions to Birmingham, Solihull, Coventry and the Black Country and these should be recognised at least in broad terms in

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						the RSS.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Conder Developments	594	2840	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	West Midlands Wildlife Trusts	533	2318	Object	No specific view on housing policies however concern expressed about the rationale and impact of the scale of development. Suggest that in light of economic difficulties and changes to the economic underpinnings of housing numbers it would be unsound to proceed with planning such a level of development. Extracts from SA on Ecosystems and Impacts on water supply are quoted to substantiate concerns about the adequacy of the evidence base to demonstrate that the housing numbers are deliverable without prejudicing the integrity of European sites.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Advantage West Midlands (AWM)	451	2493	Object	Part E seeks to target new housing in areas where the current market is weak. Is this approach supported by evidence that shows this approach will work to deliver increases in demand for new housing in those areas? The panel report into the RSS Phase 1 revision linked housing regeneration and growth in the identified corridors to employment. This is not reflected in the approach adopted in the Phase 2 review, where the issues around housing in MUAs, in particular those sections referring to areas of market failure, do not make the link with the need for employment provision as the Phase 1

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						Panel did. The location of housing can be a contributory factor in constraining the supply of labour to locations offering higher productivity activity or expanding labour supplies in areas offering only lower productivity work opportunities or non at all. The RSS should ensure it provides a policy framework of sufficient flexibility to enable such constraints to be avoided.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	WM Planning & Transportation Sub Cttee	443	3374	Object	Strongly support the retention of this policy principle which supports the Urban Renaissance and the need to accelerate it in accordance with CF4. As requirements for the MUA are minima, sufficient resources are required, especially if delivery of the Urban Renaissance Strategy is to be accelerated. Support the recognition that renovation of existing stock is a priority as well as new build but request that "replacement" of sub standard existing stock is also referred to.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Bluemark Developments Limited	579	2635	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Sir Bert Millichip Sports Ltd	144	363	Comment	The need to direct the majority of new development to the identified MUAs is supported subject to the caveats concerning the need to balance employment prospects and housing, and securing environmental safeguards, as set out in the policy.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	White Ladies Aston Parish Meeting	315	1322	Object	Have concerns relating to the credibility of this policy with the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						current financial position.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Curborough Consortium	508	1994	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbations. The policy as currently drafted will not provide for the level of housing required in the MUAs and evidence would support this position.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Harworth Estates	452	1856	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing in the peripheral areas around the conurbation. At the Black Country we have assessed local house build growth as requiring 70,100 net additional dwellings whereas the capacity for new has been guessed as only 6,200 on the plan period (8,900 difference). Telford is a suitable location to contribute significantly towards the needs in the Black Country as part of a planned strategy and this is consistent with NLP findings and the role of Telford as a SSD in Policy CF2.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	London & Cambridge Properties (2)	504	1946	Object	Housing within the MUAs needs to match the demographic profile for those residents that it intends will contribute to a highly skilled workforce. Unless the accommodation matches the profile of attractive family style accommodation in the Black Country element of the MUA then the ambitions for an Urban Renaissance

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						will fail (see also response 1951 in respect of CF8).
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Inland Waterways Association, Birmingham, Black Country & Wo	605	3667	Object	Policies require a paragraph to protect the waterways corridor from being used as total ribbon development and that adequate alternative facilities for alternative uses are included for in any linear development that may take place along its banks.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Town and Country Planning Association (TCPA)	382	3296	Object	In the current economic circumstances, there is an increasing need to ensure development viability and deliverability of urban housing schemes to secure not just the provision of variety of quality housing but quantity of housing required in the region. Clear sub-regional strategies for regeneration, urban extensions and new settlements, based on functional boundaries must be produced as guidance for LPAs in planning for housing growth responsive to local needs and challenges. Priority for development within the MUAs should be to focus on vacant dwellings under the ownership of local authorities and RSLs, 1.7% and 2.4% respectively in the West Midlands. Aspirations for economic prosperity and housing needs through intensification must be balanced with aspirations for retaining and establishing urban communities, which are highly sustainable and liveable. See rep for proposed text changes.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Home Builders' Federation	568	2575	Object	Object to aspects of policy. Do not challenge longer term urban renaissance, concerns about

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						immediate deliverability. More attention should be given to increasing the capacity for housing growth beyond MUA. Additionally, there is a need to increase the housing types within MUA. Bullet E - recommend phased approach. Bullets E & F - object to wording - seek amendment to refer to need to increase market housing supply outside of MUA
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Highways Agency	404	2147	Object	In order to manage down the impacts of development on the strategic road network the spatial strategy should provide a strong policy framework for ensuring that future development occurs in the most sustainable locations which help minimise the need for travel or use of the SRN. Would like to see consideration given to the provision of additional policy guidance within CF1 which requires that:- Within the MUAs future housing development should be integrated with the principal public transport corridors and routes serving the region's larger urban centres. Where there is a need to consider the development of sites outside these centres, accessibility mapping studies should be undertaken.- Where there is a need to consider the future release of Green Belt land for housing development, the RSS should identify those broad areas where either a strategic or local Green Belt review should be undertaken. Where there is a need to consider the development of sites in green field locations, accessibility mapping studies should

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						be undertaken. Technical work identifies need for significant investment in the region's transport infrastructure to support future housing growth, funded by both public and private sector investment. The draft Preferred Option provides little guidance on the approach that local authorities and others should take to ensure that the allocation of sites for development at the local level is aligned with the identification and delivery of any supporting transport interventions and investment. See original rep for suggested additional policy guidance which should be included to inform the infrastructure planning process.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Kingswood Road Land	502	1917	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbations. The policy as currently drafted will not facilitate for the level of housing required in the MUAs and evidence would support this position. This issue is particularly pertinent in the rural areas such as Shropshire where a large majority of the County is a self contained housing market and the reduction in housing figures in these areas and directing them to the MUAs flows against the core principle of Rural Renaissance and enabling settlements and districts to meet their own needs, especially where there is a high and growing level of imminent affordable housing needs in

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						Bridgnorth District.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Sandwell Metropolitan Borough Council	582	1368	Support	Support the continued strong emphasis on focusing housing within the MUA, and directing public and private resources to them to try to stem the out-migration to the shires. The Black Country Core Strategy has identified high levels of housing over and above that in the RSS Phase 2 that will require public and private level support to achieve this. Any additional housing capacity directed towards areas of economic potential, with a strong market focus away from the urban area to the south east of the region will undermine urban renaissance by channelling investment away from the urban area. In addition, increasing the amount of future employment growth in the south-east of the region will require additional housing growth to keep pace with demand.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	RPS Planning & Development	694	4141	Object	There is no evidence to support the assumption that there is out migration from the MUAs, as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbation. The assumptions set out for Policy CF1 are therefore founded upon little if no robust evidence and therefore the policy is unsound in restricting growth elsewhere in the peripheral areas of the MUAs. The policy as drafted will not provide for the level of housing required in the MUAs and evidence would support this position.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	BARD (better, accessible, responsible, development)	695	4153	Support	

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Advantage West Midlands (AWM)	451	2491	Object	Part D seems superfluous and seems to suggest that the approach outlined should be concentrated in the MUAs. Suggest it is placed as a preamble to the policy.CF1 also needs to reference links to employment activities including entrepreneurship and innovation. The policy could also usefully reference infrastructure requirements to ensure there is a clearer link for Core Strategies going forward.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Barratt Strategic Land	593	2779	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Gleeson Land	503	1931	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbations. The policy as currently drafted will not facilitate for the level of housing required in the MUAs and evidence would support this position. It is also not accepted that the principle of permitting greenfield urban extensions at Coventry and not at other MUAs within the Region is consistent and in line with current planning policy. CF1 should acknowledge that there is a requirement to provide housing on the peripheral areas of the MUAs including greenfield/Green Belt sites in sustainable locations if the MUAs are to deliver higher rates of growth as the current policy is not

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						implementable.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Hallam Land Management (3)	457	1874	Object	In section A, in line 3 add after 'retain' the words "and attract". Repword section C, sub section b) to read: "b) increase the scale and range of new housing development opportunities in appropriate locations guided by the Regional Housing Strategy and local and sub-regional housing strategies in most cases this will require the release of additional land on the periphery of those cities and joint working will be necessary as specified by Policy CF3 in order to provide sustainable urban extensions in the following broad locations: Coventry - North West".
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Wolverhampton City Council	530	939	Support	Support as encourages Urban Renaissance in MUA
Policy CF1	Policy CF1 Housing within the Major Urban Areas	CEG Developments	677	2932	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	CALA Homes (Midlands) Limited	592	2731	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Lichfield District Council	456	3061	Support	
Policy CF1	Policy CF1 Housing within the Major Urban Areas	I M Properties	156	496	Object	In relation to bullet point A there is a need for more emphasis in relation to the 'need to maintain a balance between employment prospects and housing development' and at the same time the introduction of an amendment to be less rigid about the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						MUA boundary. The Policy will need to be more flexible in relation to closely adjoining areas where very close inter-relationships require cross boundary issues to be addressed jointly. Such a circumstance exists at the MUA boundary where it adjoins the Water Orton and Coleshill area of North Warwickshire Borough.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Severn Trent Water (STWL)	432	1727	Object	Amend Criterion A to read: ".... And to secure environmental safeguards and necessary infrastructure improvements."
Policy CF1	Policy CF1 Housing within the Major Urban Areas	English Heritage West Midlands Region	526	3715	Object	Welcome the general emphasis but suggest a more positive encouragement to environmental improvement is given under C along with reference to SR3 at Cc
Policy CF1	Policy CF1 Housing within the Major Urban Areas	West Midlands Biodiversity Partnership	552	2194	Object	No specific view on housing policies however concern expressed about the rationale and impact of the scale of development. Suggest that in light of economic difficulties and changes to the economic underpinnings of housing numbers it would be unsound to proceed with planning such a level of development. Extracts from SA on Ecosystems and Impacts on water supply are quoted to substantiate concerns about the adequacy of the evidence base to demonstrate that the housing numbers are deliverable without prejudicing the integrity of European sites.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Shelter	534	2108	Object	Strategy should have a balanced approach to housing growth which supports both development in identified growth areas as well as the needs of Southern and Western HMA where undersupply of affordable

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						housing has led to serious affordability issues.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Persimmon Homes	591	2681	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Birmingham City Council	676	1460	Support	The City Council strongly supports the policy which sets the context for both new housebuilding and dealing with the existing housing stock in Birmingham and is consistent with the City Council's existing policy approach.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Hockley Heath Parish Council	516	4033	Support	Policies CF1 & CF2. Support the broad strategy of maximising the potential for new housing development within the MUAs and in significant settlements beyond the MUAs. It endorses the strategy for Solihull explained in para 6.13, where priority is given to development within that part of the Borough which is within the MUA and that there is no need for urban extensions.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Parkridge	348	1515	Object	Specific to housing within and adjacent to Coventry. It should be acknowledged in the RSS that significant housing growth can be achieved through sustainable urban extensions, particularly within the MUAs and that these should be of sufficient critical mass not only to enable the delivery of housing growth but also as part of a wider desire to create sustainable communities and reduce the region's carbon footprint.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Bridge Farm Partnership	663	3196	Object	Have reservations over the immediate deliverability of the urban renaissance

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						objectives. More attention should be given to increasing the capacity for housing growth beyond the MUAs into and adjoining the SSD, especially in areas where the most recent Government household projections indicate a shortfall in supply relative to the number of households. Bullets E and F of CF1 should be amended to refer to the need to increase market housing supply outside the MUAs.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Ropewalk Projects Limited	595	2886	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Dudley Metropolitan Borough Council	414	889	Support	Policy encourages Urban Renaissance in the MUAs, and is 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 CF1	Policy CF1 Housing within the Major Urban Areas	Mosaic Estates	506	1976	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbations. The policy as currently drafted will not facilitate for the level of housing required in the MUAs and evidence would support this position. CF1 should acknowledge that there is a requirement to provide housing on the peripheral areas of the MUAs including greenfield/Green Belt sites

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						in sustainable locations if the MUAs are to deliver higher rates of growth as the current policy is not implementable. This issue is particularly pertinent in the rural areas such as Shropshire and Herefordshire.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Queen's College, Oxford	656	3626	Object	Support CF1's aspiration to significantly improve the delivery and quality of housing in the MUAs including Coventry. However the policy should be more explicit about the need for urban extensions to achieve this, as anticipated elsewhere in the RSS, for instance at para 3.41.Land at Keresley to the north west of Coventry within Coventry City Council's administrative boundary is suitable, available and deliverable location for strategic level growth.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Wyre Forest District Council	299	872	Support	
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Environment Agency	547	2336	Object	The RSS should help ensure that existing houses are protected by resistance and resilience measures, while promoting better management of surface water run off to reduce the overall flood risk. It should be recognised that an essential element of improving housing stock will be to protect the houses from flood risk. It is important to ensure renovation programmes include flood resistance and resilience measures. See original rep for proposed changes to the text.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Government Office for the West Midlands	500	1171	Object	Part A - Reference to securing environmental safeguards is unclear.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Davidsons	564	2283	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						within and adjoining the Major Urban Areas. Suggested wording is included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	West Midlands Amenity Societies Assoc (West MASA)	290	1064	Object	Policy CF1 illustrates the dual MUA approach in the West Midlands and North Staffordshire. We can see no justification for this approach and suggest the following revision: "A: The potential for new housing development within the West Midlands and North Staffordshire Conurbations should be maximised to retain populations within the MUAs subject to securing environmental safeguards." Part B should be deleted. Part D - in line 3 delete the words "retain economically active households". Delete all references to Regional Housing Strategy in Policy CF1 C b) and CF1 F.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	St Modwen Developments Ltd (2)	454	1823	Object	There is no evidence to support the assumption that there is out migration from the MUAs, as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbation. The assumptions set out for Policy CF1 are therefore founded upon little if no robust evidence and therefore the policy is unsound in restricting growth elsewhere in the peripheral areas of the MUAs. The policy as drafted will not provide for the level of housing required in the MUAs and evidence would support this position.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Bloor Homes (3)	565	2453	Object	Policy needs to be rewritten in order to provide guidance on how development can take place both within and adjoining the Major Urban Areas. Suggested wording is

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						included in our paper response.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Lenco Investments	455	1839	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbations. The policy as currently drafted will not facilitate for the level of housing required in the Coventry and evidence would support this position.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Kensington & Edinburgh Estates & J Ross Devel	453	1807	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbation. Policy as currently drafted will not provide for the level of housing required in the MUAs and evidence would support this position.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Ciel Properties Ltd	408	1682	Object	There will be a need to release greenfield land around Birmingham for the development of sustainable urban extensions, that will provide the balance of homes, employment opportunities and the supporting services and infrastructure required to deliver the sustainable, mixed use inclusive communities referred to in PPS3; to achieve this will necessitate the revision of the existing Green Belt boundaries. Policy CF1 should refer to "Housing within and adjoining the Major Urban Areas", as these may offer a more sustainable approach to development than sites remote from the MUAs. One such site of around 50ha west of the A38(T) is ideally situated adjacent to the MUA and has

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						strong physical connections to allow integration with existing communities and labour supply, as well as connections to existing services, facilities and infrastructure.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Campaign to Protect Rural England West Midlands (CPRE WM)	442	3458	Object	The main thrust of policy is supported however object to the lack of guidance at para C (a) on the distinction between renovation and redevelopment. Additionally, para C (c) refers to appropriate housing types, tenures and densities but gives no further p
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Centro	384	3265	Support	Strongly support continued identification of MUA as main focus for housing development. Does however need to be supported by world class public transport corridors
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Miller Homes	505	1959	Object	There is no evidence to support the assumption that there is out migration from the MUAs as a result of previous planning strategies providing additional housing on the peripheral areas of the conurbations. The policy as currently drafted will not facilitate for the level of housing required in the MUAs and evidence would support this position. Policy CF3 fails against this policy to deliver enough growth in Solihull to meet need and demand as an MUA in itself. This is fundamentally contradictory to the principle of Urban Renaissance and should be amended as set out in our response 1961 on CF3.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Various Clients	433	1743	Object	Policy should include specific reference to provision for the elderly with supporting social and community facilities, including appropriate health provision.

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Coventry City Council	658	1407	Support	The Council strongly supports Policy CF1, especially its focus upon the MUA.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Ministry of Defence	540	3539	Object	MOD has identified requirement for 2000 new dwellings to meet their needs, provision of which can bring an economically active population which can add wealth to MUA. No reference is made to the need to take into account defence housing needs.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Burton Green Residents Association (BGRA)	476	3963	Object	Support the principle of urban regeneration. However have grave concerns regarding, and object to any suggestion (para 6.14) of greenfield extensions to Coventry. Of paramount importance is the maintenance of green belt separation between Coventry and Kenilworth. Any extension would destroy the character of Burton Green which has historically maintained ribbon development.
Policy CF1	Policy CF1 Housing within the Major Urban Areas	Metcalf, Ms B	428	4076	Object	Recommend changes to text:- CF1A. "maximised... subject to small employment and community sites being retained in localities..." There is no point in maximising housing on urban sites if community, shopping, recreation and employment facilities are relocated out of the neighbourhood.- CF1Ca. "improving the quality of stock...renovation, extension, and redevelopment". It might sometimes be more efficient to extend than rebuild.- CF1Cc. Agree. It is important to retain lower density areas in MUAs that people value and which are fundamentally pleasant places to live. In order to retain economically active population in the MUAs some new medium density

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						family homes need to be created and a small amount of new executive homes at relatively low density.- CF1Cd. Agree but i am not sure that the practice of building executive homes on scattered estates with a large number of tiny affordable homes squeezed together on the back is appropriate.- CF1E. Agree regarding redevelopment. But this needs to be a total package with scope for community buildings, local shops and places of worship, pubs etc. Both new and redeveloped areas need to have provision or scope for a range of cultural and service activities with the exception that these will be provided at least in the medium term if not sooner.- CF1F. Agree that Areas at risk of decline need attention. Perhaps there needs to be some maps at a scale one can actually read so we know what is meant?
6.10	Housing within the Major Urban Areas	Davidsons	564	2284	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	Barratt Strategic Land	593	2780	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	Persimmon Homes	591	2682	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	Ropewalk Projects Limited	595	2887	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	Conder Developments	594	2841	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	Bloor Homes (3)	565	2454	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	CALA Homes (Midlands) Limited	592	2732	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	CEG Developments	677	2933	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.10	Housing within the Major Urban Areas	Bluemark Developments Limited	579	2636	Object	Paras 6.10-6.17. These paragraphs should refer to the importance of the provision of sustainable urban extensions in appropriate locations, particularly around the West Midlands conurbation. Do not believe that many of the references in the Draft Revision in paras 6.12-6.15 which purport to suggest how housing growth can be accommodated in Birmingham, Solihull, the Black Country and Coventry, are appropriate in the RSS. The detail set out here is in some instances speculative.
6.11	Housing within the Major Urban Areas	Metcalf, Ms B	428	4077	Object	It is important to retain some options for local employment such as shops,

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						clubs, pubs and small workshops for expansion of small home based enterprises. Mixed use (as long as it is non disturbing) is desirable being climate change friendly.
6.11	Housing within the Major Urban Areas	Various Landowners & Developers	381	1560	Object	The development of any open space must follow the approach advocated in PPS17 and some form of qualification of para 6.11 is required.
6.12	Housing within the Major Urban Areas	Walsall Metropolitan Borough Council	393	967	Object	Amend penultimate sentence to read "This will require a proactive approach to redevelopment with high replacement ratios for cleared housing stock and a willingness to support an increase in overall densities, as long as these densities are compatible with the overall objective of attracting people back into the Major Urban Areas, as a crucial part of the urban renaissance."
6.12	Housing within the Major Urban Areas	Redditch Borough Council	653	1650	Object	Para 6.12 contradicts 3.61 in allowing overspill.
6.12	Housing within the Major Urban Areas	Bromsgrove District Council	492	1270	Object	Consider para 6.12 contradicts 3.61 - clarification sought
6.12	Housing within the Major Urban Areas	University of Birmingham	528	3532	Support	Welcome recognition in this new paragraph that the success of the regions urban renaissance strategy is acknowledged to be partially dependent on a range of factors being improved, including education provision and standards and skills and training. The University is committed to developing and improving its education provision in response to the challenging demands in education and considers the continued growth and development of the University will contribute to the success of the regions urban renaissance strategy.

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
6.12	Housing within the Major Urban Areas	Birmingham City University	555	3554	Support	Welcome the recognition in the new paragraph that the success of the regions urban renaissance strategy is acknowledged to be partially dependent on a range of factors being improved, including education provision and standards and skills and training. The University is committed to developing and improving its education provision in response to the changing demands in education and considers the continued growth and development of the University will contribute to the success of the regions urban renaissance strategy.
6.12	Housing within the Major Urban Areas	Solihull Metropolitan Borough Council	429	1193	Object	The paragraph should emphasis the role of gardens in protecting the local character of the residential areas of Solihull.
6.13	Housing within the Major Urban Areas	Advantage West Midlands (AWM)	451	2492	Object	Paras 6.13-6.16. Supporting text needs to explain why an urban extension is appropriate in Coventry, but not in the other areas.
6.13	Housing within the Major Urban Areas	Redditch Borough Council	653	1651	Object	With reference to final sentence of para 6.13: "to deliver the proposals in this area [MUAs] no urban extensions are needed in the period up to 2026" - it is questioned why RBC is designated as SSD.
6.13	Housing within the Major Urban Areas	Solihull Metropolitan Borough Council	429	1194	Object	The paragraph should make clear that adjustments to Solihull's Green Belt may be required to support regeneration in north Solihull.
6.13	Housing within the Major Urban Areas	Campaign to Protect Rural England (CPRE) Redditch	288	1227	Support	Good that no urban extensions are needed in Birmingham and Solihull MUA's in the period up to 2026.
6.13	Housing within the Major Urban Areas	Catesby Property Group	567	3188	Object	Approach to housing provision needs to address what will and could be provided in addition to what is .It is

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						inappropriate for the paragraph to close off opportunities for development when, as evidenced by NHPAU, there is a serious housing provision shortfall.
6.13	Housing within the Major Urban Areas	Ciel Properties Ltd	408	1681	Object	Specific references to the exclusion of urban extensions should be removed as this is prohibitive to potentially highly sustainable development.
6.13	Housing within the Major Urban Areas	I M Properties	156	497	Object	The statement that 'no urban extensions are needed in the period up to 2026' is opposed. This increased provision could be accommodated immediately adjacent to the MUA in a highly sustainable urban extension within North Warwickshire Borough in the vicinity of Water Orton. This suggested area could be included within the 'large urban extension' as part of a cross boundary in initiative and would address the under provision of housing in N Warwicks Borough as well as helping to create a more sustainable, mixed use community.
6.13	Housing within the Major Urban Areas	St Modwen Developments Limited	266	740	Object	Longbridge should be identified as an early priority for action and similarly at para 6.58 (under Central HMA 1)
6.14	Housing within the Major Urban Areas	Campaign to Protect Rural England West Midlands (CPRE WM)	442	3459	Object	Greenfield urban extensions and greenbelt boundary revisions have no more justification in Coventry than any other part of MUA
6.14	Housing within the Major Urban Areas	Brown, Mrs	675	3251	Object	If additional land is required to meet the housing trajectory then the LDD should bring forward the most sustainable alternatives regardless of their location. Sites in adjoining districts are actually more sustainable and therefore more appropriate for development than sites within the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						Coventry administrative boundaries. Cross boundary working with adjoining local authorities should be supported to ensure these aims can be met.
6.14	Housing within the Major Urban Areas	Kenilworth Town Council	270	826	Object	Concerned that the Coventry quota may not stay within the City boundary.
6.14	Housing within the Major Urban Areas	University of Warwick	499	3421	Support	Support the preparation of Joint Studies between Coventry and Warwickshire to consider any proposed urban extensions and amendments to Green Belt boundaries, including the need for the University's expansion land to be removed from the Green Belt.
6.14	Housing within the Major Urban Areas	Lenco Investments	455	1840	Object	There is a clear need to deliver sustainable urban extensions to Coventry City as set out in our response to Policy CF3 and Table 1. RSS should acknowledge this, in particular against the higher levels of housing that are required in the Region and should take a proactive approach to identifying solutions.
6.14	Housing within the Major Urban Areas	Hallam Land Management (3)	457	1873	Object	After 'Within Coventry' in the first sentence add "the search for development sites". Sentence 3 - reword to read "The most suitable urban extensions should be identified following joint studies with Warwickshire authorities and the City Council, adjacent to the city within other local authority areas. This would involve amendments to the Green Belt boundaries."
6.14	Housing within the Major Urban Areas	Queen's College, Oxford	656	3627	Object	There are sufficient studies undertaken by Coventry City Council to demonstrate that there will be a shortfall in housing delivery unless

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						sustainable urban extensions and the release of land currently designated as Green Belt are allocated within LDDs (in relation to Coventry). The paragraph should be explicit in terms of acknowledging the need for sustainable urban extensions within Coventry City Council's administrative area, to deliver the housing numbers and address the imbalance within the housing market as anticipated elsewhere in the RSS. See rep for suggested change to the text. If cross border working is necessary to deliver sustainable urban extensions it should not be to the detriment of the need to release land from the Green Belt and allocate it for development as soon as practicable.
6.14	Housing within the Major Urban Areas	J G Gray Limited	543	2124	Object	SHLAA identifies that only a maximum supply of 19,230 dwellings might be delivered in Coventry in the period to 2026, leaving a shortfall of 14,270 new dwellings to be delivered within the administrative boundary in sustainable greenfield urban extensions. RSS should acknowledge that further investigation into housing supply has been carried out by Coventry City Council, the results of which conclude that additional greenfield sites are needed and thus if Coventry is to meet the housing requirements set out in the RSS the early delivery of sustainable urban extensions will be essential.
6.14	Housing within the Major Urban Areas	Newcombe Estates Company Limited	541	2120	Object	SHLAA identifies that only a maximum supply of 19,230 dwellings might be delivered in Coventry in the period to 2026, leaving a shortfall of

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						14,270 new dwellings to be delivered within the administrative boundary in sustainable greenfield urban extensions. RSS should acknowledge that further investigation into housing supply has been carried out by Coventry City Council, the results of which conclude that additional greenfield sites are needed and thus if Coventry is to meet the housing requirements set out in the RSS the early delivery of sustainable urban extensions will be essential.
6.15	Housing within the Major Urban Areas	British Waterways	412	3159	Support	Broad strategy supported.
6.15	Housing within the Major Urban Areas	Goodall V E	216	568	Comment	Own a parcel of land in Mamble which I would wish to see developed for housing. I would expect any development to accord with Governmental objectives in respect of affordable housing. This land is unused and in a generally untidy condition as well as being well outside any flood plain.
6.15	Housing within the Major Urban Areas	Walsall Metropolitan Borough Council	393	968	Object	Delete last sentence as it is too restrictive and conflicts with para 6.25.
6.16	Housing within the Major Urban Areas	Inland Waterways Association, Lichfield Branch	48	238	Object	Policy CF3 & para 6.16. Surprised at the low housing total for Stoke on Trent compared to the other MUA authorities, and in particular to the Black Country which has similar needs for major regenerative development and similarly large areas of brownfield land. Only reason given at 6.16 about a currently weak housing market is a weak excuse when the strategy covers 20 years. A similar focus on the regeneration of this MUA is needed to that accorded to the Black Country to maximise the

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						benefits of investment to the people of the North Staffordshire conurbation and to minimise the loss of greenfield land elsewhere in Staffordshire. Proposals in Table 1 should be revised to increase figure for Stoke on Trent by double or treble the amount proposed and reduce those for the other Staffordshire authorities and in particular Burton upon Trent, Lichfield, Cannock Chase and Stafford. Proportional changes will then need to be made to the provisions for employment land in Policy PA6A and Table 4.
6.17	Housing within the Major Urban Areas	Metcalf, Ms B	428	4078	Object	Agree that there is a need for social infrastructure. Such things as schools and clinics need planning alongside the housing for new communities. There seems very little recognition of the social infrastructure resourcing needed in the RSS.
6.17	Housing within the Major Urban Areas	Government Office for the West Midlands	500	1172	Object	Repetition of policy content of preceding paragraphs relating to need for place making approach to development within MUA
6.18	Housing beyond the Major Urban Areas	Davidsons	564	2285	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2275). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	Bloor Homes (3)	565	2455	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2445). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	Ropewalk Projects Limited	595	2888	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2878). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	CEG Developments	677	2934	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2924). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	CALA Homes (Midlands) Limited	592	2733	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2723). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	Bluemark Developments Limited	579	2637	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2627). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	Persimmon Homes	591	2683	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2673). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	Barratt Strategic Land	593	2781	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response 2771). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.18	Housing beyond the Major Urban Areas	Conder Developments	594	2842	Object	Paras 6.18-6.20. The RSS Paragraphs should explain those locations which are most appropriate for development as set out in the proposed Policy we have suggested in the Spatial Strategy (Response

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						2832). It is clear that there is a number of settlements which are closely related to the existing MUAs particularly with sustainable transport provision to those Major Urban Areas.
6.19	Housing beyond the Major Urban Areas	Advantage West Midlands (AWM)	451	2494	Object	Policy CF2 & para 6.19. There appears to be an overemphasis on the role of the MUAs and on the concept of urban renaissance, given the importance of ensuring that rural and peri-urban locations also continue to serve their local hinterlands and help deliver economic regeneration to settlements and towns outside the MUAs. The RSS needs to continue to push the urban renaissance agenda, especially in areas of significant need, but should also seek to further economic growth by more clearly demonstrating that sustainable housing locations outside the MUAs might be acceptable under certain circumstances.
6.19	Housing beyond the Major Urban Areas	Government Office for the West Midlands	500	1173	Object	Reference to importance of considering Habitats Regulations, SEA regulations and SA repeats national policy as this is a requirement of development anyway.
6.19	Housing beyond the Major Urban Areas	Campaign to Protect Rural England West Midlands (CPRE WM)	442	3460	Object	Objection to open-ended reference to greenfield extensions where appropriate.
6.19	Housing beyond the Major Urban Areas	Natural England	394	3561	Object	Other important elements of the regional "natural environment" have been afforded insufficient weight in considering the level of distribution of growth across the sub-regional parts of the West Midlands. Recommend a change to the wording of paragraph 6.19:"...However, it is also important that development does not undermine

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
						the urban renaissance of the MUAs. The importance of consolidating habitats and buffering impacts of development, on European nature conservation sites and other environmental assets must be considered."
6.19	Housing beyond the Major Urban Areas	Carillion Developments	178	529	Support	
6.19	Housing beyond the Major Urban Areas	I M Properties	156	498	Comment	Particular points made in NLP Report after para 1.4 which are supportive of additional housing provision beyond the MUAs.
6.19	Housing beyond the Major Urban Areas	QinetiQ	406	2207	Object	Delete first three sentences and insert: "Independent research commissioned by the Government Office (NLP) provides evidence that additional housing supply outside the MUAs will not harm the achievement of Urban Renaissance and will not reduce housing supply within them. It also highlights the advantages of providing sufficient housing to meet emerging needs, including economic growth, addressing affordability problems and supporting rural renaissance. In view of this evidence and to ensure that sufficient housing is provided across the Region, Policy CF2 (alongside CF3) provides a strategy for housing provision beyond the MUAs. As a result of the Habitats Regulation Assessment, the importance ...."
6.19	Housing beyond the Major Urban Areas	English Heritage West Midlands Region	526	3716	Object	Consider the inclusion of '...that development does not undermine the urban renaissance of the MUAs, nor harm the environmental quality and historic character of an area'
6.19	Housing beyond the Major Urban	Walsall Metropolitan	393	969	Object	Amendments needed to underpin a

Policy/ Para No	Policy/Para Title	Respondent/ Organisation	Respondent id	Response No	Object/ Support	Summary
	Areas	Borough Council				maximum allocation in Districts outside the MUAs. Wording in the first sentence of CF2 C needs to be revised to read "Housing development elsewhere will only be permitted where it will support the objective of meeting local ..." Second sentence in para 6.19 should be revised to read "It is important that communities are allowed to grow and change and that housing needs are met, including through greenfield extensions as appropriate, as long as housing is not over-provided in relation to the maximum figures set out in table 1."
6.20	Housing beyond the Major Urban Areas	Advantage West Midlands (AWM)	451	2495	Support	Recognition of the potential of Telford to contribute to the growth of a large and sustainable community will provide positive opportunities for the delivery of aspects of the Wolverhampton to Telford HTC.