

Urban Renaissance in the West Midlands: Origins, Progress and Future Prospects

Prepared on behalf of West Midlands Planning and Transportation Sub-Committee by the West Midlands Chief Engineers and Planning Officers Group (CEPOG) Support Team

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Purpose

- 1 This paper has been prepared to support the representations of the West Midlands Planning and Transportation Sub-Committee (Respondent 443) and is intended to be read in conjunction with the formal representations that it has submitted to the RSS Phase Two Examination in Public.
- 2 It also seeks to advise the Panel and other participants of the origins of urban renaissance nationally and regionally, progress made to date, future prospects and risks to future delivery. It also seeks to demonstrate that whilst there are key urban renaissance principles, they require different application depending on specific local circumstances.
- 3 Wherever appropriate, links are made to other Core Documents.

Origins of the Urban Renaissance – The National Picture

- 4 From the 1950's onwards it is well documented that Major Urban Areas (MUAs) began to decline in terms of population and jobs. Much of this was driven by increased personal affluence, mobility and the desire for a better environment and was facilitated through the New Towns programme or more localised decentralisation strategies.
- 5 Challenging these trends was seen as a political priority in the mid to late 1990s, especially against the backdrop of ever increasing household projections and the rising prominence of the sustainable development agenda. In response, the Government set up the Urban Task Force in 1998, which led to the publication of its report *Towards an Urban Renaissance* (June 1999), which included over 100 recommendations.
- 6 Many of these recommendations were addressed by the Government in its Urban White Paper *Our Towns and Cities: The Future* (443/7). This proposed a multi agency approach to urban regeneration of which planning was a crucial part; indeed it introduced the 60% target for the re-use of Brownfield land which exists to this day in PPS 3 para 41 (CD86). Paras 4.16 and 4.17 from the White Paper are particularly pertinent in terms of spatial planning:

We have also been allowing too many new houses to be built on greenfield sites. This threatens the countryside and fuels the flow of people away from urban centres towards the edge of towns and cities and beyond.

This is unacceptable. We have therefore set a national target that, by 2008, 60% of new housing should be built on brownfield land or be provided by the conversion of existing buildings. We have also abandoned the old predict and provide approach to housing need and introduced a new policy of Plan, Monitor and Manage to guide future housing provision at the regional and

local levels. This allows a more flexible approach which recognises that circumstances change and is not driven by rigid targets based on household projections alone.

The Origins of Urban Renaissance in the West Midlands

- 7 This national commitment to an urban renaissance came at an opportune moment for the West Midlands. The 1995 (updated in 1998) RPG 11 set out a framework for the Region's development up until 2011. This advocated planned decentralisation to the Central Crescent towns, which are adjacent to the Metropolitan area and have strong economic, cultural and social ties with it. This zone of influence extended to and beyond Warwick, Leamington, Stratford, Worcester, Kidderminster, Stourport, Bridgnorth, Telford, Stafford, Lichfield and Tamworth and into North Warwickshire. It also included towns such as Redditch, Cannock and Droitwich.
- 8 Whilst population had grown by approximately 10% in the Region between 1981 and 2001 (Fig. 5), it had fallen by almost 5% in the MUA, which comprises the West Midlands Metropolitan Area and the North Staffordshire Conurbation. Much of this was attributable to planned out migration to the surrounding Shires.
- 9 Whilst unemployment began to fall in the MUA from the from the early 1990's, creating new jobs to support a growing population, against the backdrop of a declining manufacturing sector, the traditional preserve of the MUAs, was proving a challenge. Workplace employment in the MUAs fell during the 1980s and early 1990s whilst it actually grew in other parts of the Region (Fig. 6).
- 10 These trends, which were consistent with those highlighted by the Urban Task Force, led to the conclusion that there needed to be a fundamental change in direction in regional spatial planning in the West Midlands, and the vehicle for taking this forward was the 'new' RSS.
- 11 With regard to the 'old' RPG 11, the Panel concluded in 2002 (CD55) that:

RPG 11 was felt to have underperformed on regenerating urban and remoter urban areas, providing affordable housing, and promoting development in the north and west of the Region (para 1.12).

Incorporating Urban Renaissance into Regional Spatial Planning

- 12 The adopted RSS was submitted to the Secretary of State in 2002 and was subjected to EiP later that year. It was finally published in June 2004.
- 13 The adopted RSS sets out 'a fundamental change in direction' (Chapter 3, CD18) in regional spatial planning in the West Midlands.

- 14 At the heart of the adopted RSS are the twin objectives of urban and rural renaissance. Urban renaissance is described succinctly in para 3.4a as:

Developing the MUAs in such a way that they can increasingly meet their own economic and social needs in order to counter the unsustainable outward movement of people and jobs facilitated by previous strategies.

- 15 This is linked with rural renaissance, which is summarised as; areas beyond the MUA focussing on meeting indigenous needs rather than accommodating out migrants from the MUAs.

- 16 Indeed, the Secretary of State firmly endorsed this approach right at the outset when publishing the document:

The RPG process has provided the opportunity to fundamentally reassess the nature of the West Midlands and the changing circumstances, threats and opportunities that each place within it faces. In doing so the continued decentralisation of population and investment from the MUAs and the need to create balanced and sustainable communities across the Region have been identified as key issues.

An important factor in the trend of decentralisation from the MUAs has been the availability of development land in the settlements close to them. This has contributed to the loss of investment, abandonment and environmental degradation from the MUAs and increased development and environmental pressure in other parts of the Region. The dispersal of population and activities under-uses the social and physical resources of the MUAs and contributes to unsustainable development patterns that lead people to make more and longer journeys , more often than not by the private car (paras 3.1 and 3.2).

- 17 The spatial strategy for the MUAs is clearly set out in para 3.8, which states that:

In the MUAs of Birmingham/Solihull, the Black Country, Coventry and the North Staffordshire Conurbation more development opportunities will be created to retain and attract people and investment primarily by:

- a) Supporting the market renewal of residential areas in Birmingham/Sandwell and North Staffordshire currently suffering from low demand;*
- b) Tackling deprivation and creating employment opportunities in the five urban regeneration zones which cover parts of the MUAs;*
- c) Protecting and enhancing the quality of urban environments;*
- d) Creating a balanced network of vital and vibrant towns and city centres as the strategic focus for major leisure, retail and office developments;*

- e) *Resisting peripheral expansion for office development for housing, but, in certain circumstances, allowing regionally important employment where this supports the urban re naissance; and*
- f) *Improving the quality of transport networks to reduce social inclusion, improve economic performance and facilitate a more sustainable pattern of development*
- 18 The adopted RSS is policy rather than trend led; it is based on matching opportunities with meeting needs and redirecting growth to areas where regeneration is of paramount importance. This was firmly acknowledged by the Panel, which made it clear that undue weight should not be given to household projections. Indeed it commented that:
- This is undoubtedly the case here where the RPB is seeking a change in direction as expressed through the slow down in the rate of out-migration from the MUAs (CD55 para 5.3.34).*
- 19 Whilst the RSS directs new development to the most appropriate locations, it is not merely a land development programme. It is a spatial strategy and the policy relates equally to existing communities and built up areas (rural as well as urban) and seeks to promote their continued wellbeing as well as making provision for future development. It also seeks to guide and integrate the activities and investment of other agencies.
- 20 The adopted RSS was also aligned with the Regional Economic Strategy (RES), particularly in terms of directing development and investment to areas of need through the introduction of five Urban Regeneration Zones (Policy PA2):
- East Birmingham North Solihull
 - North Black Country and South Staffordshire
 - North Staffordshire
 - Coventry and Nuneaton
 - West Birmingham and South Black Country
- 21 As the Panel noted, these and a further Rural Regeneration Zone, contain 60% of the Region's long term unemployed and 30% of its population and contain substantial opportunities. AWM had pledged to spend 70% of its resources in these areas over the next 20 years (para 2.1.4). The Urban Regeneration Zones are all within the MUA, except Nuneaton and a small part of South Staffordshire.
- 22 The adopted RSS set out a bold new strategy for the Region which sought to match opportunities with need, particularly in existing communities requiring regeneration, hence the 'policy not trend led' distribution of growth. Population growth in such areas supports centres and other local infrastructure, for example schools, and seeks to raise

expectations, helping to reverse the spiral of decline following decades of unsustainable trends.

- 23 In publishing the adopted RSS, the Secretary of State maintained that:

Whilst it is not anticipated that the spatial strategy will require a fundamental review in the short to medium term it is expected to evolve in response to monitoring, lessons learnt, the changing external environment and new opportunities (para 3.16).

Phased Revision of the adopted RSS

- 24 In publishing the RSS in 2004, the Secretary of State identified further areas of work that needed to be undertaken and it was agreed that these would be taken forward in a staggered, three phased revision.

RSS Phase One Revision - The Black Country

- 25 The Phase One Revision was launched in 2005, published in January 2008 and is enshrined into the adopted RSS. This set out a suite of sub regional policies specific to the Black Country and has guided the subsequent preparation of the Joint Core Strategy.

- 26 This Revision firmly endorsed the urban renaissance principles and set specific Black Country objectives consistent with it (para 3.14a):

- a) To reverse out migration
- b) To raise income levels
- c) To create an inclusive and cohesive society within the Black Country
- d) To transform the Black Country environment

- 27 Indeed the Panel resolved that there was 'no other tenable option' to the radical changes being sought through the Phase One Revision (para 1.2)

Phase Two Revision

- 28 This commenced in 2005 and, in accordance with the Secretary of State's request, considered matters in relation to sustainable communities, climate change, town and city centres, employment land, transport and waste. The level of housing was also rolled forward to 2026.

- 29 The agreed Project Plan (CD34), stated that

The Revision to the RSS will lead to the further development of policies to support the underlying strategy – not a review of fundamental principles of the existing strategy (page 9)

- 30 The net housing requirement in the Phase 2 Preferred Option is 365,600 dwellings for the period 2006 to 2026, compared to 180,425 in the

adopted RSS for the period 2007 – 2021. The distribution in the Preferred Option is consistent with urban renaissance principles in that, collectively, the MUAs are meeting a greater proportion of their indigenous needs than was the case with previous strategies which were based on planned decentralisation.

- 31 The Preferred Option as submitted makes it clear that '*the fundamental change of direction*' in regional policy is being maintained; indeed the Urban and Rural Renaissance chapters remain unchanged and the Spatial Strategy objectives have only been changed at the margins to provide greater clarity. Importantly, the policy relating to Urban Regeneration Zones (PA2) and their contribution towards urban renaissance remains intact.
- 32 Discrete changes have been made to existing policies and new policies introduced, which support the urban renaissance. These include:
- **Policy CF4:** Phasing of new Development seeks to accelerate delivery of new housing in the MUAs
 - **Policy CF5:** Sets specific brownfield targets for the MUAs and other parts of the Region
 - **Policy PA6A:** Specifying employment land requirements in accordance with spatial strategy objectives to support the MUAs in fulfilling their economic potential
 - **PA12A and PA13A:** Specifying levels of office and retail development similarly
 - Providing greater sub regional guidance through the introduction of statements in Chapter Three.
- 33 This latter point is significant as it emphasises that a one size fits all policy approach is inappropriate and that there is a different application of urban renaissance principles dependent upon the location.
- 34 Again the Preferred Option was prepared in tandem with the revised RES. It is also of note that the AWM-commissioned Housing Policy and Economy Study (451/2) concluded that the levels of growth proposed in the Preferred Option supported the closing of the Region's £10 Billion output gap.

The Sub Regional Dimension of Urban Renaissance

- 35 The urban renaissance has common principles which have different applications dependent on specific local circumstances. This can be summarised as follows:

- Urban extensions in Coventry to provide critical mass to support development of the city centre and to meet sub regional needs
- Accelerated growth in the Black Country to exploit its potential, meet need and retain population
- Careful location, scale & phasing of growth in North Staffordshire so as not to overload a fragile housing market
- Focused growth in Solihull and Birmingham to address regeneration needs and prevent urban sprawl

Progress towards the Urban Renaissance

- 36 The purpose of this section is to provide an overview of key trends that demonstrate that the urban renaissance is being delivered. Further, detailed information can be found in the WMRSS Annual Monitoring Report (CD19).

Housing

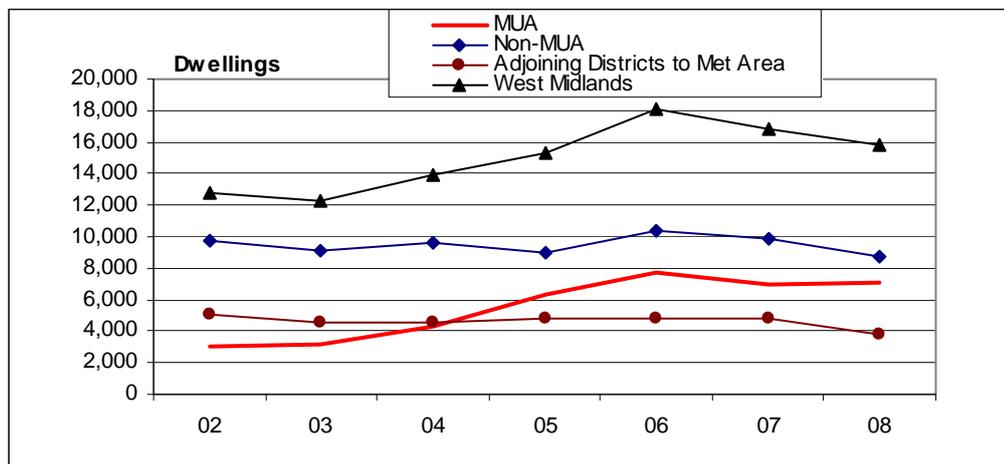


Fig. 1 Net housing completions 2002-2008
Source: Regional Housing Land Availability Surveys 2001/2 - 2007/8

- 37 Fig. 1 shows that net completions in the MUA have more than doubled since 2002 whilst they have remained relatively stable elsewhere and by 2008 MUA completions accounted for almost 50% of the Region's total. This is significant considering that consents outside of the MUA, granted prior to the 2004 policy step change, would still be feeding through the system and contributing to the overall completions total.
- 38 Furthermore, WMRA migration analysis (CD246) demonstrates that as MUA and ex MUA completions converge, there is some evidence that the rate of out migration from the Metropolitan Area slows down. Although the RSS policy approach is in its infancy, these early signs are encouraging.

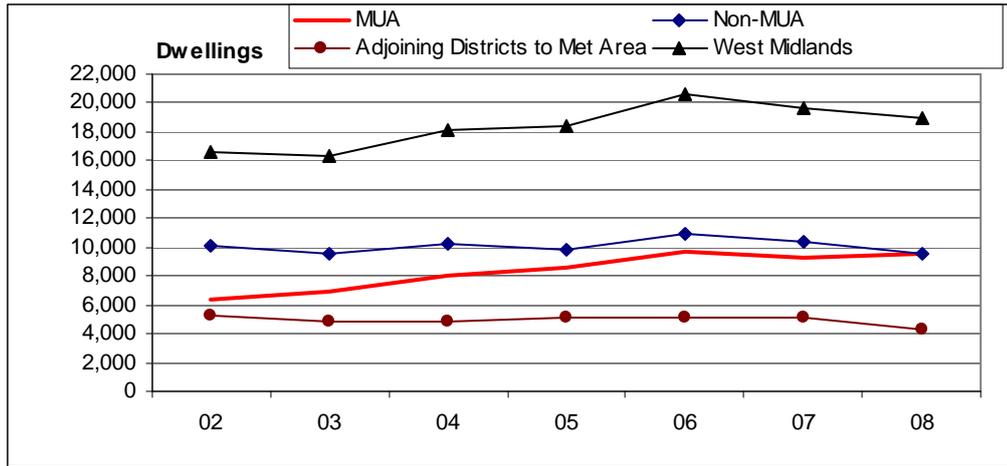


Fig. 2 Gross housing completions 2002-08
Source: Regional Housing Land Availability Surveys 2001/2 - 2007/8

39 In terms of gross completions, these again have been increasing steadily in the MUA relative to other parts of the Region and now comprise half of the Region’s total. This again is a very positive trend as it demonstrates the role that renewal and re-modernisation has in increasing the overall supply of housing in the MUAs. This is a key policy approach in the adopted RSS and is maintained in the Preferred Option.

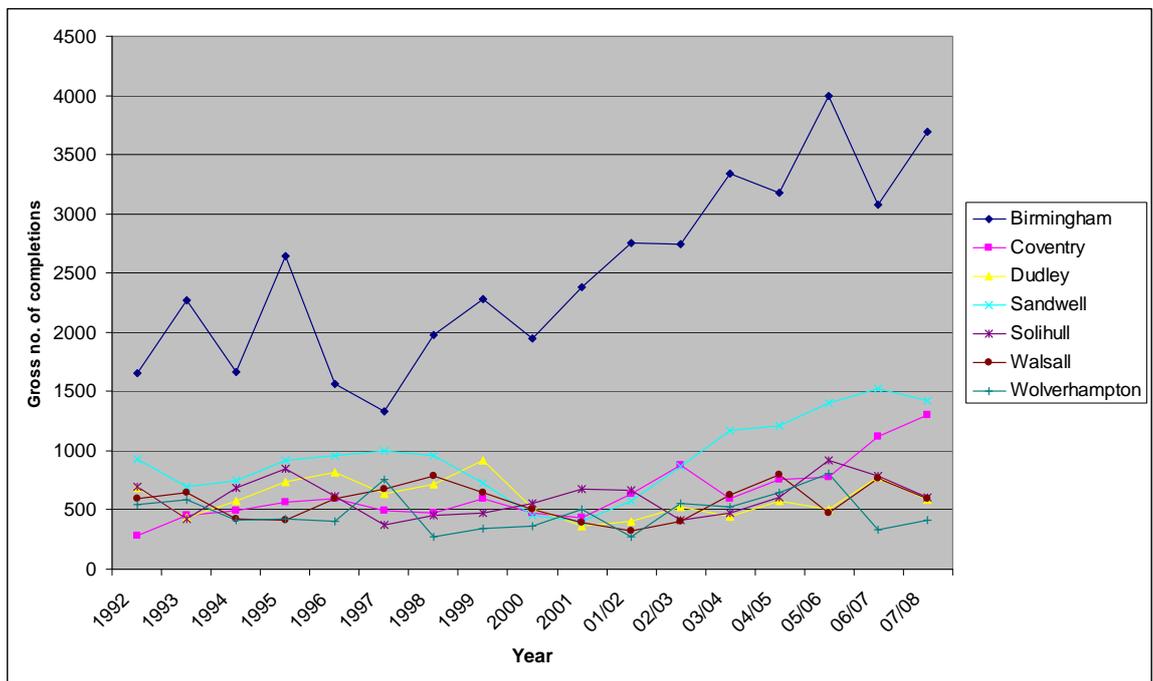


Fig. 3 Gross housing completions by Local Authority 1992-2008
Source: Regional Housing Land Availability Surveys

40 Fig. 3 shows trends in gross completions since 1992 in each of the Metropolitan local authorities. Birmingham, Sandwell and Coventry have shown significant growth since the early part of the decade, which in the case of Birmingham and Sandwell, is particularly encouraging, especially

as historically, they have witnessed population decline and contain some of the most deprived communities in the country.

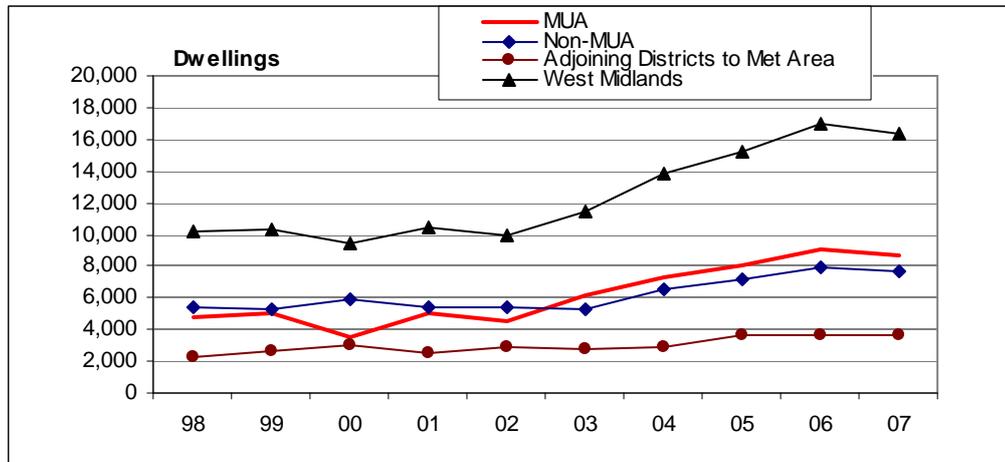


Fig. 4 Gross housing completions on previously developed land
Source: Regional Housing Land Availability Surveys 2001/2 - 2007/8

- 41 The above graph shows that housing completions on previously developed land have increased significantly across the Region; however, the MUA has performed better than elsewhere. Again, increasing the rate of brownfield delivery is consistent with urban renaissance, regeneration and wider sustainability principles.

Population

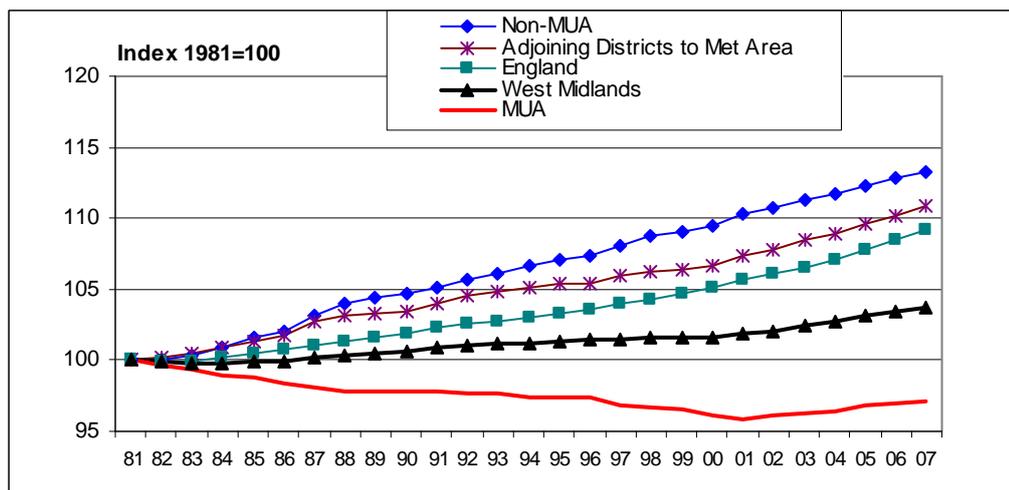


Fig. 5 Population estimates 1981-2007
Source: ONS mid-year population estimates

- 42 Fig. 5 shows that following two decades of decline, population is beginning to grow in the MUAs. Again, this is a very encouraging trend and would appear to demonstrate that the urban renaissance policy is beginning to 'bite', albeit it that it is still early days.

Employment

- 43 Since the early 1990s employment has grown steadily in the Region; however this trend is not replicated in the MUA where employment levels have remained stable (fig. 6). This clearly implies that there is a need to continue focusing investment and job creating development within the MUA if it is to achieve its full economic potential. The Regeneration Zones are a key policy tool for this and employment land allocations included in the Preferred Option reflect this policy priority.

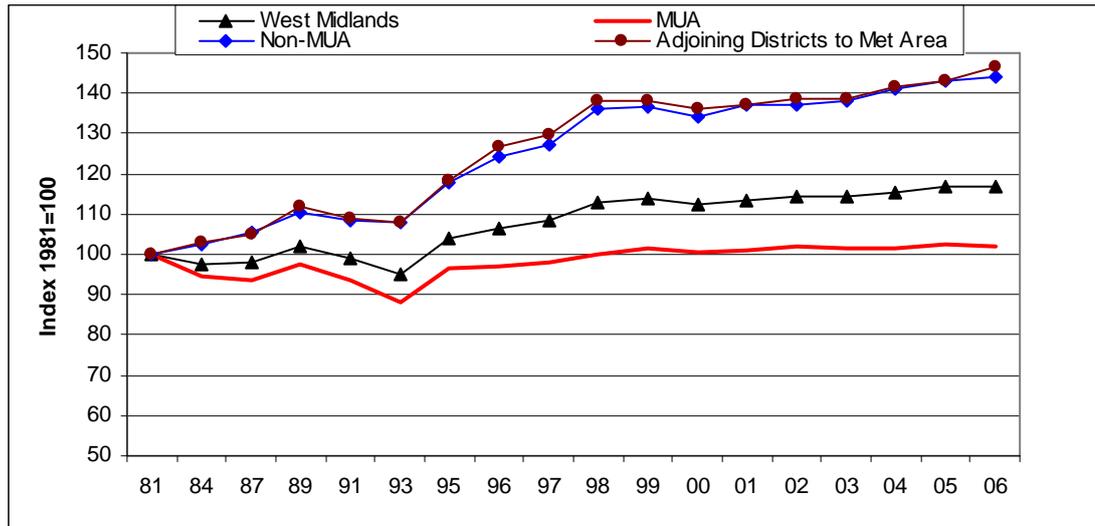


Fig. 6 Total workplace employment change 1981-2006
 Source: ONS - Census of Employment (CE), Annual Employment Survey (AES) and Annual Business Inquiry (ABI)

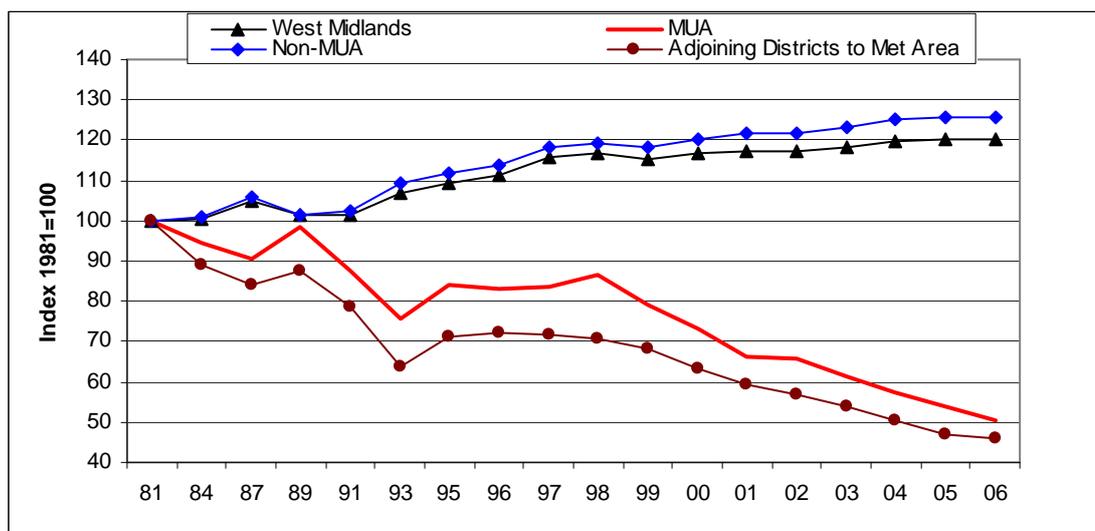


Fig. 7 Workplace manufacturing employment change 1981-2006
 Source: ONS Crown (CE, AES, ABI)

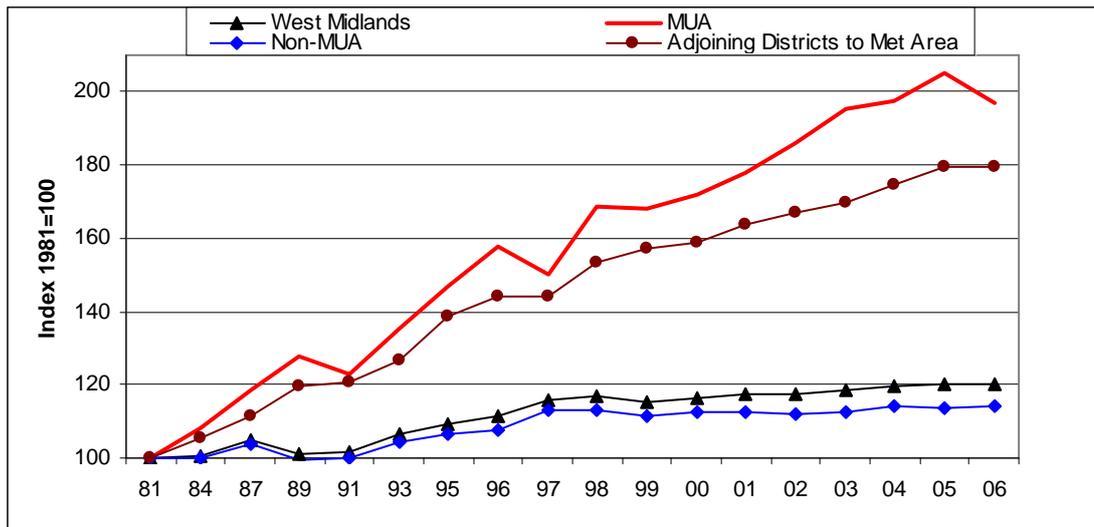


Fig. 8 Workplace service employment change 1981-2006
Source: ONS (CE, AES, ABI)

- 44 Figures 7 and 8, however, show that losses in manufacturing employment have largely been offset by growth in the service sector. It is imperative, however, that manufacturing employment in the MUA, particularly in higher value added sectors, does not continue to decline relative to other parts of the Region. Again, improving the employment land offer in the MUAs through the Preferred Option's employment land strategy, alongside the continuation of Regional Investment Site and Regeneration Zone policies, is important to achieving this.

Future prospects

- 45 Regional Funding Advice (RFA) submitted to the Regional Minister in February 2009 (CD241) sets out the Region's priorities from 2009 – 19. This identifies 20 Impact Investment Locations where resources can yield maximum benefits (fig. 9), 17 of these are within or directly support the MUAs. It is estimated that across the Region as a whole, Impact Investment Locations will contribute towards the delivery of over 45,000 new homes.
- 46 This demonstrates the commitment of key regional stakeholders and partners to accelerating the delivery of urban renaissance. This is consistent with the Preferred Option which seeks to accelerate delivery of the urban renaissance and build on the momentum gathered over the last few years.
- 47 In addition, the Region's two Pathfinder Areas have recently been awarded additional resources for 2009/10 by the Homes and Communities Agency to tackle housing market weakness and renewal. The Birmingham Sandwell Pathfinder (Urban Living) has been awarded £17.5 million plus an additional £6.9 million Growth Point funding; the

North Staffordshire Pathfinder (RENEW) has been awarded a further £34 million.

- 48 CLG has also recently announced that over £7 million will be available from its Community Infrastructure Fund (CIF) for Coventry and Birmingham. CIF money is allocated specifically to deal with transport barriers preventing housing sites coming forward.
- 49 The Metropolitan Authorities also comprise the administrative basis for the City Region of Birmingham, Coventry and the Black Country, which came into existence early in 2006. It is a voluntary partnership between all seven Metropolitan Authorities the West Midlands Regional Assembly, Advantage West Midlands, the regional Learning and Skills Council, and the business community. It exists to increase levels of personal and business prosperity through aligning policy and funding decisions of a connected, coordinated and cross border basis.
- 50 On 5th March 2009, the City Region of Birmingham, Coventry and the Black Country made a submission to be a forerunner City Region to pilot the devolution of statutory economic development powers to be announced by the Chancellor in the Budget on 22nd April.
- 51 The City Region submission is seeking:
- Powers to introduce Accelerated Development Zones (ADZs)
 - Powers to directly influence national employment and skills funding
 - Government to commit to minimum level of funds for the City Region
 - Government departments and agencies under duty to support City Region priorities
- 52 In terms of ADZs, a separate proposition was developed with PricewaterhouseCoopers and submitted to the Prime Minister on 28th January. In short, ADZs seek to identify an area for development which would attract business investment, then agree with Government that a proportion of new business rates would be retained within the City Region.
- 53 This future income would then be used to borrow the money required to invest in infrastructure and economic development projects in the ADZ area which would generate new business rate income. Once the business rates raised have been used to repay the original loan, Government would enjoy that business rate stream thereafter.
- 54 Eight schemes across the City Region were included in the ADZ: Birmingham Eastside; Birmingham Wholesale Markets/Southern Gateway; Bordesley Park; Wednesbury Brierley Hill Stourbridge Rapid

Transit Scheme; City Centre – Airport Rapid Transit Scheme; M6 J10 improvements; M5 J2 improvements; and i54 Wolverhampton.

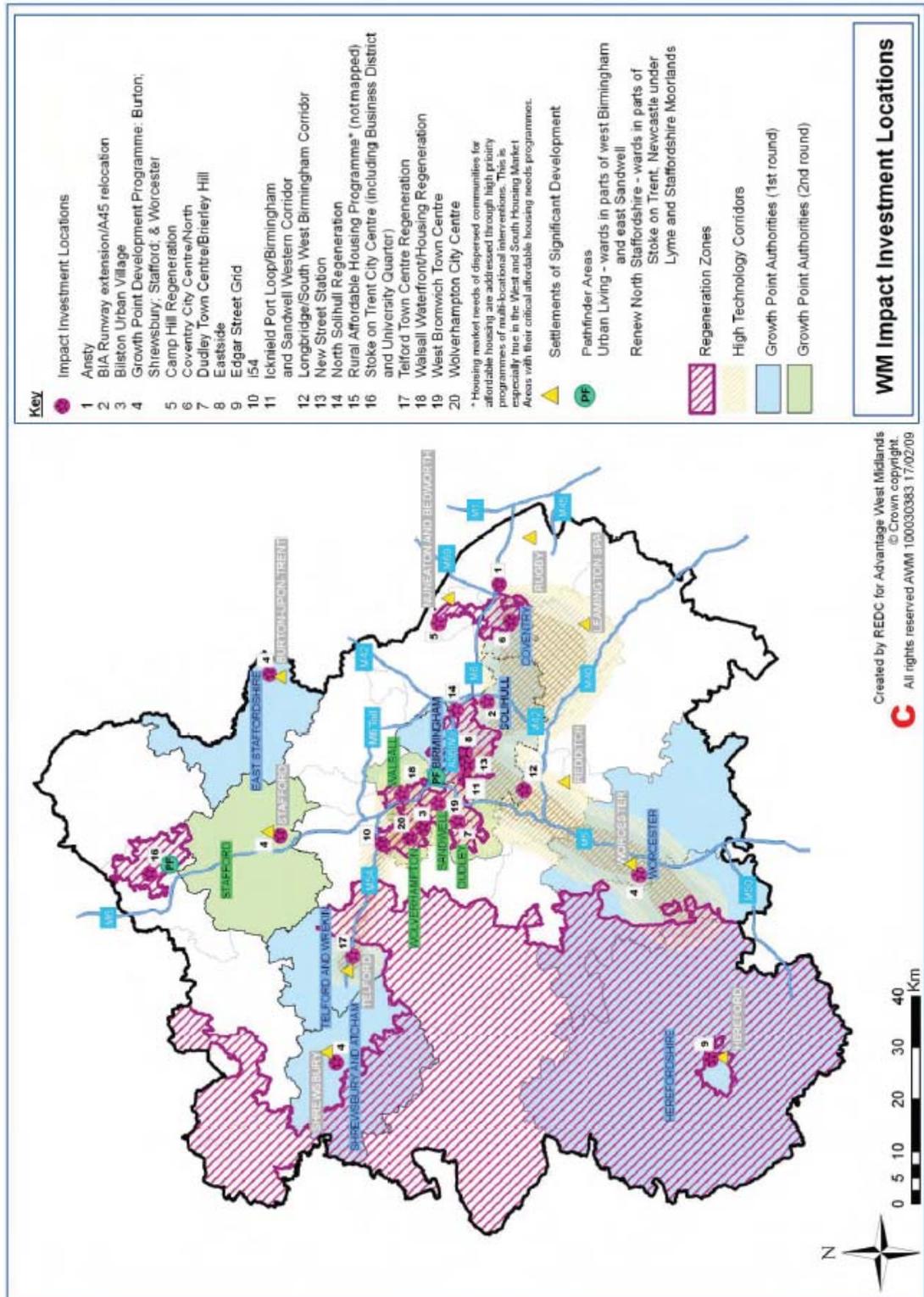


Fig. 9 Map of Investment Impact Locations
Source: West Midlands Regional Funding Advice to Government (CD241)

Risks to Future delivery of Urban Renaissance

- 55 To deviate from the Preferred Option, however, could undermine the urban renaissance, undo progress to date and also have adverse implications for other parts of the Region. For example, if out migration from the Metropolitan Area is not stemmed, approximately 200,000 people could leave over the next 20 years; this is equivalent to 8% of the current population or the population of a Borough the size of Solihull (CD 246).
- 56 The NLP study, however, advocates alternative levels and distributions of growth and these are supported by some respondents. The risks to urban renaissance of altering the strategy, especially in these times of economic uncertainty, are set out below.
- 57 A Risk Assessment of the NLP proposals (CD22) has been undertaken on behalf of WMRA; the headline findings from this along with other material are considered below:

- (i) **The NLP study does not consider the implications of additional growth on existing communities**, which will continue to accommodate the vast majority of the Region's residents over the next 20 years. The Preferred Option is not a land development programme but a spatial plan which applies equally to existing communities.

As set out in the migration analysis (CD246), there is a concern that a failure to balance in and out migration in the Region could lead to a significant loss of the more economically active MUA residents. This will have adverse consequences in terms displacing investment and marginalising existing infrastructure such as centres and schools and runs counter to the Government's overarching policy to deliver decent homes for all. There could also be grave consequences in terms of social cohesion, social exclusion and the ability to deliver mixed, balanced and sustainable communities.

- (ii) **There is a lack of integration in the NLP approach** in that employment land, retail, office and waste disposal matters are not addressed in accordance with the proposed housing growth and redistribution; as such capacity constraints and the implications for existing facilities are not considered.
- (iii) **Displacement of scarce public and private sector investment.** The Draft Implementation Plan Supplement (CD233) estimates what infrastructure is required to deliver the Preferred Option. As far as we are aware there has been no similar assessment by those proposing higher levels of growth. Indeed, NLP abdicated infrastructure provision to the local level, which given the scale of

additional growth proposed is unreasonable and unacceptable. There is a real concern that scarce public investment will be directed to provide infrastructure in such locations when it would be spent more effectively within the MUAs.

- (iv) **The additional growth is not backed by ‘effective demand’ defined (i.e. demand backed by money) or by the capacity of the development industry to deliver.** The NLP study appears to assume that these increased levels of development will be delivered and takes no account of the risks associated with this not happening.

Clearly to oversupply land in such circumstances, especially in the current economic climate is a very high risk approach, as the industry with its well documented reduced capacity will be even more likely to ‘cherry pick’ more attractive Greenfield sites.

NLP analysis cites anecdotal evidence that this is not the case (conclusion 3); however, there is a wealth of literature to counter this view. As the gap between housing land provision, effective demand and industry capacity widens, the risks of displacement become more acute.

The growth levels proposed in the Preferred Option are challenging, even more so in the current recession, and there clearly needs to be a strong approach to phasing if the urban renaissance is to be delivered as a priority.

- (v) **There is no correlation between increasing land availability and improving affordability.** Fig 10 shows that in the Metropolitan Area, even as rates of delivery have grown significantly, house prices continued to rise until the credit crunch, whilst commitments have increased significantly also. Clearly other factors were at play such as attractive mortgage terms until the credit crunch, which adversely impacted on access to finance.

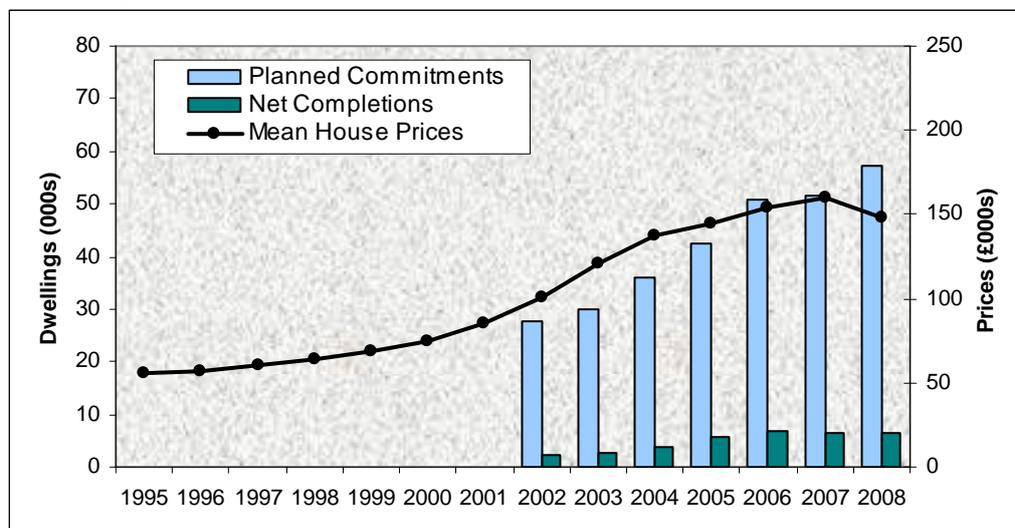


Fig. 10 Completions, Commitments and House prices in the Metropolitan Area
Source: Land Registry data via CLG and local monitoring

- (vi) **Higher levels of growth will require substantial adjustments to Green Belt boundaries.** There is no evidence from proponents of higher levels of growth that any analysis has been undertaken in terms of the role of Green Belts as set out in PPS 2 para 1.5. In terms of the MUAs, Green Belt releases over and above those anticipated in the Preferred Option are considered to run counter to urban naissance strategy.

Unnecessarily releasing Green Belt will undermine urban renaissance through the displacement of development activity. This risk is exacerbated in the current economic climate. This conclusion was central to the Panel's recommendations in 2002 (CD55 R2.2 p. 23)

Conclusions

- 58 Urban Renaissance principles were established through the Government's Urban White Paper in 2000. This acknowledged that previous decentralisation policies that had been pursued were proving unsustainable and this was clearly the case in the West Midlands.
- 59 These urban renaissance principles were embedded within in the RSS that was adopted in 2004. This identified a *'fundamental change of direction'* whereby areas would increasingly meet their own needs. A policy rather than trend led approach was adopted and opportunities were linked to needs through the likes of Urban Regeneration Zones as foci for investment; needs were met and growth redirected accordingly.
- 60 This approach was rigorously tested and subsequently supported by the Panel and the Secretary of State. Both acknowledged that the strategy needed time to bed in and saw no need for immediate review of that strategy.
- 61 Upon publication of the RSS in 2004, additional areas were identified for further consideration through a three phased revision which seeks to strengthen the RSS, not fundamentally review the underlying principles such as urban renaissance. Indeed, urban renaissance principles have been reinforced through the Phase One Revision – The Black Country. However, core urban renaissance principles require different application, dependent upon local circumstances.
- 62 The RSS is a statutory spatial plan, not merely a land development programme; it relates equally to existing communities both urban and rural. It is widely acknowledged that out migration from urban areas is selective and failing to stem this leads to the hollowing out of existing communities, leading to a spiral of decline, social polarisation and unbalanced communities. The RSS also aligns with partner strategies

such as the RES and seeks to guide other investment programmes activities.

- 63 Although it is early days, this Background Paper has highlighted that there are encouraging signs that the urban renaissance strategy is beginning to 'bite' in the MUAs. This has been evidenced by an increasing number of gross and net housing completions compared to the rest of the region; increased recycling of previously developed land; the beginnings of a reversal of historic population decline; and a slowing down in the rate of out migration.
- 64 Job growth in the MUAs continues to be a concern but policies are in place in the RSS and accompanying RES to address this.
- 65 Measures are in place to implement the urban renaissance strategy through, for example Regional Funding Advice that has recently been submitted to Government, and the innovative Accelerated Development Zones initiative that has been prepared by the Birmingham, Coventry and Black Country City Region.
- 66 This paper outlines the potential risks of deviating from the existing strategy, as advocated by the NLP study. These risks include the displacement of people, investment and jobs from the MUAs and an unnecessarily loss of Green Belt. It also suggests that deviating from the existing strategy will have little impact on improving affordability.
- 67 To deviate from the Preferred Option, particularly given current economic circumstances such as a lack of effective demand and capacity constraints in the development industry will exacerbate these risks and potentially undo progress made to date. The RSS is a long term strategy, and a short term 'fix', such as the early release of Greenfield sites, is likely to have long term environmental and social consequences.