

# **West Midlands Regional Spatial Strategy Phase Three Revision Options Consultation 29th June 2009 – 14th August 2009**

## **Consultation Questionnaire To be completed and returned by 14th August 2009**

This questionnaire is divided up into five sections each one refers to a chapter in the main Options Consultation document.

<b>Critical Rural Services</b>	<b>Page 2</b>
<b>Gypsies, Travellers and Travelling Showpeople</b>	<b>Page 3 - 4</b>
<b>Culture Sport and Tourism</b>	<b>Page 5</b>
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<b>Minerals</b>	<b>Page 12 - 15</b>
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Within each section there are a series of questions, each one has a unique reference (e.g. CRC1 for critical rural services). If you need more space to respond to any of the questions please attach extra sheets and refer to the question reference number.

You do not need to complete all of the sections in the questionnaire. It is acceptable to focus on the issues and topics that are most relevant to you/your organisation.

Please ensure that your details are included with your response by completing the 'Your Details' box below.

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**The questionnaire can also be completed online. Visit the homepage of the Assembly's website at [www.wmra.gov.uk](http://www.wmra.gov.uk) for more details.**

**To be completed and returned  
by 14th August 2009**

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Please note that the West Midlands Regional Assembly has a strict policy for dealing with any offensive comments/representations. If we feel that any submission received is offensive, we will, in the first instance, contact the author and request that the comments are re-phrased before being re-submitted. If the material submitted continues to be offensive then it may be forwarded to the relevant authorities.

**Question CRC1:** Studies have shown that it is very difficult to define rural services as “important” or “critical”, and that pursuing these definitions is unlikely to be of much value. Do you agree with this view?

Please tick one box     Yes                       No

If no, please provide reasons and a list of those rural services that you consider to be “critical”.

*The issues that exists across the region are so varied and in many cases so localised we do not believe trying to identify those which are regionally important or critical is possible and it should be left to more detailed planning in LDFs to determine what are the specific issues for a particular districts or settlements.*

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**Question CRC2:** The SQW Report identified significant service deprivation issues for people in “accessible rural” areas whose access to transport is limited (see page 21). Do you think more attention should be given to meeting the service needs of this group?

Please tick one box     Yes                       No

If yes, please provide reasons (and where possible, evidence) for your answer.

*The needs of all rural communities need to be address and focussing too much on one particular demographic could be to the detriment of other rural communities. Access to public or private transport is only one element of rural service deprivation; this issue needs to be addressed in conjunction with other factors which may limit people access to services in ‘accessible rural areas.’*

*The term ‘accessible rural areas’ is one which either needs to be clearly defined or removed completely, the lack of clarity about what the accessibility factors which have been used to define accessible rural areas could be open to misinterpretation.*

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**Question CRC3:** Arguments have been put forward that new development should be allowed in settlements lacking a service base in order to reverse a cycle of decline in such places. (“Planning for Sustainable Communities” – CRC; “A Living and Working Countryside” – Taylor Review). Do you agree with this view?

Please tick one box     **Yes with reservations please see below**     No

If yes, please provide your reasons and any relevant evidence, including identified locations, and suggestions.

*The introduction of new, or continued provision of services in rural settlements is an essential*

*element of the rural renaissance although this need has to be considered within the wider context of the RSS and the aim of urban renaissance. The development that maybe required to secure any new service provision in smaller settlements cannot simply override other significant RSS aims and other national policies such as Green belts. The district of Bromsgrove is 91% green belt which consistently is faced within pressure for development stemming from the MUA. Any new residential development within the district to support the provision of new services needs to be carefully planned to meet identified local needs and not simply be used in an attempt to meet higher levels of housing which came under much scrutiny through the RSS phase 2 preferred option production and subsequent EIP. The council recognises the importance of providing access to service across the district but the provision should not be predicated on the unsustainable distribution of new residential development. The level of development required to support these new services is unspecified although likely to be significant at the local scale which would require significant alteration to the green belt, the council question if this solution to increasing service delivery is one which can be achieved whilst still maintaining the focus of development to be the MUA, and the continued protection of the green belt.*

*The economics of rural service provision is complex and will need to be considered carefully in any subsequent policy. It would need to be clearly evidenced that the market would genuinely locate services in areas where there is currently a deficit and where new development is planned to address this. Without the genuine commitment of the service/retail sector to locate to these areas any new development would simply exacerbate the lack of services for rural communities.*

*Other initiatives such as improved IT infrastructure and improved public transport should also be considered as an alternative to further development in areas where the lack of adequate broadband facilities/ bus provision could go some way to improving the level of services to a settlement.*

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**Question CRC4:** Three policy Options for rural service developments are suggested (see pages 22-23). Please state if you have a preferred Option, and the reasons for your preference.

Please tick one box       Option 1: Sustainable – Climate Change Driven  
    Option 2: Community Based  
    Option 3: Status Quo

Please provide reasons for your preference

*Option 1 is supported as all development urban or rural should be driven by the all the principles of sustainability and not just climate change, taking this as a starting point option 2 then also becomes relevant as the need of a community influence successful sustainable development. As significant issues have been identified in the provision of services in rural areas option three cannot be considered.*

*Under option 1 the concentration of services in the larger settlements is supported although this*

*should not rule out any provision which could be provided on a more localised scale for isolated rural communities, if too much focus is placed on delivering the majority of services in these settlements opportunities might be lost to provide in other locations as service providers simply look to the larger towns. As stated in the response to CRC3 the wider aims of the RSS will need to be considered when looking to locate development to support the provision of services to the more rural areas of the region.*

*Improved public transport is one which the council strongly supports and believes further efforts should be concentrated to improve the penetration, frequency and variety of public transport that serves rural communities.*

*Option 2 is also supported and one which the council believes already takes place to some extent in the formulation of various plans and strategies at the local level including the ongoing work of the LSP and with the production of the LDF which has involved significant local engagement.*

*The concerns about a scattered distribution of housing development is one which the district council share although accept that some small scale development in some of the more isolated settlements is needed, although probably not at a level which would support the significant investment required to providing additional rural services. The council supports additional development to meet identified local affordable housing needs but would look to other ways of increasing access to services before allocating additional non needs related residential development to small settlements.*

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**Question CRC5:** For your preferred Option above please suggest how the Option might be delivered at the regional level, taking into account the relevant key issues and implications in the Critical Rural Services chapter.

*As already stated the issues for rural services are varied across the region and not one which the RSS can deal with in any great detail. Local strategic planning and particularly ongoing work with core strategies will identify the local issues which need addressing. It is important that policies contained in the RSS support a wide range of potential solutions to ensuring the service needs of all rural communities are met. The requirements of the planning system and in particular the SA process will ensure that both options 1 and 2 are considered fully in any new policies introduced at a local scale.*

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## Gypsies and Travellers

**Question GTQ1:** Do you agree with the total residential pitch requirements (939 pitches), as identified by the sub-regional Gypsy and Traveller Accommodation Assessments?

Please tick one box     Yes             No

If no, please provide reasons (and where possible, evidence) for your answer.

The council has no evidence to suggest the figures contained in the GTAA are incorrect

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**Question GTQ2:** Do you think the three Options on page 35 for the provision of residential Gypsy and Traveller pitches provide a good range of solutions?

Please tick one box     Yes             No

If no, do you think there is another Option which could be explored? Please provide reasons (and where possible, evidence) for your answer.

The 3 options provide a broad range of solutions.

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**Question GTQ3:** Which of the three Options on page 35 for the provision of residential Gypsy and Traveller pitches do you prefer and why?

Please tick one box     Option 1     Option 2     Option 3

Please provide reasons for your preference.

*Option 1 is most appropriate as demand should be met where it arises. Traditionally Bromsgrove District has been an area of low demand and it is therefore considered that any provision above this would lie vacant. Generally gypsies and travellers are attracted to areas where there a high number of seasonal jobs (e.g. fruit picking) in areas such as Wychavon. This demand cannot be re-distributed as Bromsgrove does not many characteristics that are attractive to travelling communities.*

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**Question GTQ4:** You may wish to consider the need for residential pitch requirements in specific parts of the West Midlands Region (for example in a particular city/sub-region/county. Please state where and provide any comments on this specific area and explain your reasons.

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**Question GTQ5:** Do you think the numbers allocated in Table 2 on page 40 for Transit provision (244 pitches) will meet the accommodation needs of Gypsies and Travellers?

Please tick one box     Yes             No

If no, please provide reasons (and where possible, evidence) for your answer.

*The council has no evidence to suggest the figures contained in the GTAA are incorrect*

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## Gypsies and Travellers continued

**Question GTQ6:** Do you think the geographical distribution of pitches for Transit provision indicated in Table 2 on page 40 will meet the accommodation needs of Gypsies and Travellers?

Please tick one box     Yes             No

If no, please provide reasons (and where possible, evidence) for your answer.

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**Question GTQ7:** Do you think the draft Policy for Transit provision should be strengthened? (see page 39).

Please tick one box     Yes             No

Please provide reasons (and where possible, evidence) for your answer.

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## Travelling Showpeople

**Question TSQ1:** Do you think the numbers allocated in Table 3 on page 42 for Travelling Showpeople (118 plots) during the five year period of 2007-2012 will meet their accommodation needs?

Please tick one box     Yes             No

If no, please provide reasons (and where possible, evidence) for your answer.

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**Question TSQ2:** Which of the two Options in Table 3 on page 42 for the distribution of additional plots for Travelling Showpeople do you favour?

Please tick one box     Option 1             Option 2

Please provide reasons for your preference or if you think there is another Option which could be explored please provide reasons (and where possible, evidence) for you answer.

*Option 1 is more appropriate as it is based on the GTAAs, which are most robust evidence available.*



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**Question TSQ3:** Do you agree that the plot numbers for Travelling Showpeople should be allocated on a County basis, rather than down to district level?

Please tick one box     Allocated on a County basis     Allocated on a District basis

Please provide reasons for your preference.

*Due to the nature of the travelling communities and the limited data available allocations to each county is probably most appropriate.*

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**Question CST1:** Which of the Options on page 53 do you think should be used as a basis of revising Policy PA10 Part A and why?

Please tick one box       Option 1: Remove the portfolio  
    Option 2: Update portfolio to include all regionally significant assets

If you have chosen Option 2, what assets (see B.O.P. report, item 11 on page 59) do you think should be added/removed and explain why you think they are or are not of regional significance.

*The District Council has no firm view on the current list and also its continued inclusion within the RSS, although would point out that attempting to highlight those assets of particular significance in an area which is largely subjective will inevitably lead to debate from various groups and organisations with conflicting interests. Including either the current list or an amended one could have detrimental effect on other assets across the region if it is seen as only those listed deserve protection and investment.*

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**Question CST2:** Do you think that Policy PA10A should “protect”, as well as improve existing strategic cultural assets from development?

Please tick one box       Yes                       No

If yes, please provide reasons for your answer and suggest how the WMRSS could protect the assets.

*Where assets are not currently protected by and existing policy then protection is important although as the options document points out the protection should not be seen as restriction on further investment and growth of the asset if it can be done without damaging the assets original character .*

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**Question CST3:** Which of the Options on page 57 do you think should be used as a basis for revising Policy PA10 Parts B and C to address any gaps in strategic culture, sport and tourism assets provision in the Region?

Please tick one box       Option 1: Retain existing PA10 B & C  
    Option 2: Update existing PA10 B & C  
    Option 3: Develop a new policy in addition to PA10 B & C

If you have selected Option 2 or 3, what new criteria do you consider are important to add and why?

*Both options 2 and 3 are possible ways of enhancing the current regional policy with regards to culture tourism and sport . the focus of the policy should be just wider than economic development and should aim not only attract people into the region to experience the assets on offer but should also aim to tackle the lack of participation that exists within the region especially in respect of sporting activities.*

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**Question CST4:** Do you agree with the strategic gaps identified in the Burns Owens Partnership (BOP) report? (see page 54).

Please tick one box     Yes             No

If no, are there any other strategic gaps which you consider exist and what evidence exists to support your case?

*The district council has no reason to disagree with the findings of the report, although think there are more small scale local gaps in provision which will be highlighted through LDF preparation.*

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**Question CST5:** Do you think the Options on pages 53 and 57 could help to address poor quality and access issues in relation to culture, sport and tourism assets?

Please tick one box     Yes             No

What suggestions do you have as to how the WMRSS can best address quality and access issues, and any others, which you might think are relevant for culture, sport and tourism? Please provide reasons (and where possible, evidence for your suggestions).

*Although as stated above significant work needs to be done on a more local scale through the work of LSPs and the development of LDFs to ensure that more localised assets are utilised and improved alongside those with perceived regional significance.*

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## Policy QE2 – Restoring Degraded Areas and Managing and Creating High Quality New Environments

**Question ENV1:** Do you agree with the suggested list of issues a – f on page 65 that a revised Policy QE2 could include?

Please tick one box      Yes                       No

Are there any suggested issues which you think a revised Policy QE2 should not include? If so, please tell us why you think these issues should be excluded.

*As a district with very little brownfield land remaining, we would support all policies which attempt to ensure the most effective and efficient use of Brownfield land across the region especially in the MUA in preference to development of Greenfield land in green belt districts where only local needs should be met as a priority.*

*The district council does not have any influence on the West Midlands brownfield land working group and would suggest a new body is set up to ensure the views of all stakeholders are sought on any policies for the development of brownfield land.*

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Are there any additional issues which you think a revised Policy QE2 should include? If so, please tell us what issues you think should be included and why.

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**Question ENV2:** Which Option on page 65 would you prefer Policy QE2 to follow, and why?

Please tick one box      Option 1: Needs Led  
                                     Option 2: Growth Led  
                                     Option 3: Competitiveness Led

Please provide reasons for your answer.

*A combination of elements of all three options would be the most suitable depending on local circumstances and informed by evidence generated by the production of LDFs. The diverse nature of the region means not one approach would be suitable for all areas. as the levels of growth and amounts of Brownfield land and development potential differs so markedly across the region no one solution would meet the requirements of all stakeholders.*

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**Question ENV3:** Are there any other strategic options that you think we should consider in relation to restoring degraded areas and managing and creating high quality new environments?

Please tick one box     Yes             No

If yes, please explain your option(s) and provide reasons for your answer.

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**Question ENV4:** Which, if any, of the means for implementing Policy QE2 outlined in a - c on page 66 do you think would be most appropriate, and why?

Please provide reasons for your answer.

*(a) would be relevant to Bromsgrove District although it would only give a measure of implementation rather than any mechanisms to ensure the right development is taking place.*

*(b) would not be relevant to Bromsgrove due not being in the MUA or regeneration zone, and also the lack of Brownfield land, if not all districts prepare action plans this process could potentially miss out on development taking place in lesser growth areas where the priorities mean an action plan is not prepared.*

*(c) could be appropriate in certain circumstances although wording at the moment presumes that barrier to development can always be alleviated, which may not always be the case.*

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## Policy QE4 – Greenery, Urban Green Space and Public Spaces

**Question ENV5:** Do you agree with the list of issues a – f on page 67 that it is suggested Policy QE4 could include?

Please tick one box     Yes             No

Are there any suggested issues which a revised Policy QE4 should not include? If so, please tell us why you think these issues should be excluded.

*Agree with the changing of the title to Green Infrastructure*

*The policy should include as much information as possible to ensure green infrastructure planning is carried out consistently across the region, it should also clearly identify who is responsible for leading on green infrastructure, currently districts or groups of districts are preparing studies, although much of the information and resource to complete these studies sits at a county level.*

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Are there any additional issues which you think a revised Policy QE4 should include? If so, please tell us what issues you think should be included and why.

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## Policy QE5 – Protection and Enhancement of the Historic Environment

**Question ENV6:** Do you agree with the list of issues a – j on page 68 that it is suggested Policy QE5 could include?

Please tick one box     Yes             No

Are there any suggested issues which a revised Policy QE5 should not include? If so, please tell us why you think these issues should be excluded.

*Section C in the superseded document relating to the value of conservation led regeneration should be included in the revised document.*

*Also Para (c) of the revised document stresses the importance of considering the wider townscape, but this should not be at the expense of detailed site specific analysis. The text as suggested implies that the wider analysis is more important than the individual site, and should be amended to stress the value of both assessments.*

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Are there any additional issues which you think a revised Policy QE5 should include? If so, please tell us what issues you think should be included and why.

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## **Policy QE6 – The Conservation, Enhancement and Restoration of the Region’s Landscape**

**Question ENV7:** Do you agree with the list of issues a – i on page 69 that it is suggested Policy QE6 could include?

Please tick one box     Yes                       No

Are there any suggested issues which a revised Policy QE6 should not include? If so, please tell us why you think these issues should be excluded.

*We would like clarification on the type of references that would be made under point d) and would also question how specific references would be to urban fringe areas where change will be taking place. this is likely to have already been or should be determined by Core strategies and not at a regional level.*

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Are there any additional issues which you think a revised Policy QE6 should include? If so, please tell us what issues you think should be included and why.

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## **Policy QE7 – Protecting, Managing and Enhancing the Region’s Biodiversity and Nature Conservation Resources**

**Question ENV8:** Do you agree with the proposed targets for improving priority habitats set out in Annex C on page 123 and if not, why?

Please tick one box     Agree with proposed targets                       Disagree with proposed targets

If you disagree, please provide reasons for your answer.

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## Policy QE7 – Protecting, Managing and Enhancing the Region’s Biodiversity and Nature Conservation Resources (continued)

**Question ENV9:** Do you agree with the list of issues a – i on page 70 that it is suggested Policy QE7 could include?

Please tick one box     Yes             No

Are there any suggested issues which a revised Policy QE7 should not include? If so, please tell us why you think these issues should be excluded.

- (d) *In Worcestershire, the Worcestershire Biodiversity Partnership is going to develop the local opportunity map rather than each local authority in the County developing their own local opportunity maps in the LDF process. This is considered more appropriate especially when green corridors will cross local authorities’ boundaries. Similar to online Landscape Character Assessment map, the local opportunity map could be considered as a living map. This is considered more appropriate especially when species can move across and that where they move during the change of climate is uncertain. Also, new surveys may give different results which lead to the revision of the local opportunity map.*
- (g) *It is unlikely that development will be permitted in local sites unless the important features or the condition of the local sites are protected or enhanced through the development (the NERC Act). At the same time, there is nothing that the local authority/ planning system could do if there is no development and the site is in private ownership.*
- (h) *Recognise that there could be conflicts between geodiversity and biodiversity? And that geodiversity will affect habitats and hence location of biodiversity.*

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Are there any additional issues which you think a revised Policy QE7 should include? If so, please tell us what issues you think should be included and why.

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**Question ENV10:** Should the focus of Policy QE7 be mainly on the existing Biodiversity Enhancement Areas, or alternatively those areas identified in the Regional Opportunities Map (on page 72), and why?

Please tick one box     Existing Biodiversity Enhancement Areas  
                                   Areas identified in Regional Opportunities Map

Please provide reasons for your answer.

*No comment due to the council currently having no dedicated officer dealing with biodiversity issues and as such rely on the county council and Natural England and other organisations for inputs on biodiversity matters.*

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## Policy QE8 – Forestry and Woodlands



**Question ENV11:** Do you agree with the list of issues a – i on page 73 that it is suggested Policy QE8 could include?

Please tick one box     Yes                       No

Are there any suggested issues which a revised Policy QE8 should not include? If so, please tell us why do you think they should be excluded.

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Are there any additional issues which you think a revised Policy QE8 should include? If so, please tell us what issues you think should be included and why.

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## **Protection of Agricultural Land**

**Question ENV12:** Do you agree with the list of issues a – f on page 74 that it is suggested that the text relating to the Protection of Agricultural Land could include?

Please tick one box     Yes                       No

Are there any suggested issues which revised text for Protection of Agricultural Land should not include?

If so, please tell us why you think these issues should be excluded.

*The district council supports the protection of Agricultural land although accepts if housing targets identified in the phase 2 revision are to be met then agricultural land in close proximity to existing settlements may have to be lost, this fact should be reflect in any revised wording.*

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Are there any additional issues which you think revised text on the Protection of Agricultural Land should include?

If so, please tell us what issues you think should be included and why.

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## Policy QE9 – The Water Environment

**Question ENV13:** Do you agree with the list of issues a – i on page 75 that it is suggested Policy QE9 could include?

Please tick one box     Yes             No

Are there any suggested issues which a revised Policy QE9 should not include? If so, please tell us why you think these issues should be excluded.

*The issues raised seem to repeat those being addressed by PPS25, more regional specificity should be included if this policy area is to have real benefit for the region.*

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Are there any additional issues which you think a revised Policy QE9 should include? If so, please tell us what issues you think should be included and why.

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## Air Quality

**Question ENV14:** Do you agree with the list of issues a – d on page 76 that could be included in text relating to Air Quality?

Please tick one box     Yes             No

Are there any suggested issues that you think should not be included in revised text for Air Quality? If so, please tell us why you think these issues should be excluded.

*Current air quality issues in Bromsgrove are being assessed through the draft core strategy and AQMAs*

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Are there any additional issues which you think revised text for air quality should include? If so, please tell us what issues you think should be included and why.

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## Integrated Approach to the Management of Environmental Resources

**Question ENV15:** Do you agree with the list of issues a – i on page 79 that it is suggested Policy QE1 could include?

Please tick one box     Yes             No

Are there any suggested issues which a revised Policy QE1 should not include? If so, please tell us why you think these issues should be excluded.

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Are there any additional issues which you think a revised Policy QE1 should include? If so, please tell us what issues you think should be included and why.

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**Question ENV16:** Which Option on page 79 would you prefer Policy QE1 to follow, and why?

Please tick one box       Option 1: Environment Led  
    Option 2: Development Led  
    Option 3: Spatial Strategy

Please provide reasons for your answer.

*As with many of the answers above the council view a hybrid of the above options suitable depending on the individual circumstances across the region, although environment led should be the most relevant as option 3 the spatial strategy and option 2 development areas it identifies should stem from full consideration of the environment. If the RSS is to be successful then significant development should not be allowed which don't conform with option 3, which should have been develop with option 1 in mind.*

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## Flood Risk

**Question ENV17:** Do you agree with the suggested list of issues a – l on page 84 that a new Flood Risk Policy could include?

Please tick one box     Yes     No

Are there any suggested issues which a new Flood Risk Policy should not include? If so, please tell us why you think these issues should be excluded.

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Are there any additional issues which you think a new Flood Risk Policy should include? If so, please tell us what issues you think should be included and why.

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## Energy

**Question ENV18:** Do you think that Policy EN2 in the existing WMRSS should be revised to encourage improvements to the energy efficiency of existing buildings as opportunities arise?

Please tick one box     Yes     No

Please provide reasons for your answer, including any views you may have on how a regional policy on energy efficiency could be implemented.

*The council fails to see how the RSS can have an impact on existing buildings especially if there is then no planning application related to the building. The use of words such as encourage also would not add any certainty to the policy and would leave it open to much interpretation and again we would question how it would be genuinely implemented and enforced.*

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**Question ENV19:** Which of the Renewable Energy Target Options do you think should be used in the WMRSS to promote the development of renewable energy and low carbon technologies in the West Midlands? (see page 90).

Please tick one box     Option 1: Adopt national target for renewable energy  
                                   Option 2: Adopt Regional Energy Strategy targets for renewable energy  
                                   Option 3: Sub-regional targets for renewable energy

Please provide reasons for your answer.

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*The Council feels setting targets is useful although have no firm view on which one is the most suitable, adopting the national target would offer some consistency nationwide although does to take into account local factors. It is felt that regional and sub regional would be more worthwhile as there is a higher chance that they are actually achievable on the ground. The District Council is and will continue to work with Worcestershire County Council and other colleagues to ensure that targets for renewable energy production identified in the Core Strategy are both worthwhile and also achievable.*

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**Question ENV20:** Do you think that the WMRSS should set regional targets for specific renewable energy and low carbon technologies such as biomass, combined heat and power (CHP), ground source heat, landfill gas, solar, wind etc?

Please tick one box     Yes             No

Please provide reasons for your answer.

*The council would be looking for support from other agencies and the sub region to identify the possibility of providing the various technologies in new development across the district. And as such have no firm view on this element at the moment, although if evidence suggests that targets should be included either at a regional, sub regional, or local level in order for the potential of these solutions to be fulfilled the council will look to ensure they are included in any future local planning policies.*

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**Question ENV21:** Do you think that the WMRSS should retain the existing Policy EN1 on Energy Generation (Option 1) or should it set out clear regional criteria to assess whether planning applications for renewable energy and low carbon technologies are appropriately located (Option 2)?

Please tick one box       Option 1: Retain existing Policy EN1  
    Option 2: Criteria-based policy to ensure that renewable energy is appropriately located

Please provide reasons for your answer. If you answered Option 2, please also answer Question ENV22.

*Guidance contained in a criteria based policy would set a framework for districts to develop local policies, although careful consideration will need to be given to ensure that the criteria is flexible enough for local circumstances to be taken into account .*

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**Question ENV22:** If you think the WMRSS should include clear criteria for assessing applications for renewable energy and low carbon technologies (Option 2 above) please tell us which are the most important factors in assessing where renewable energy and low carbon technologies would be most appropriately located. Please rate each factor on a scale of 0 - 5.

Score (0 is not important, 1 is the least important and 5 is the most important).

Contribution to the global environment

Contribution to the local economy

Impact of fauna, flora and animal life

Noise

Odour

Traffic Implications

Visual Impact

Other factor(s) (please specify below)

*All of the above are important although as with many of the responses local circumstance will dictate which ones are most important in particular areas.*

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**Positive Uses of the Green Belt**

**Question ENV23:** Should the WMRSS develop a policy to secure positive use and improvements of the Green Belt and urban fringe (Option 1), or rely on the guidance in national Green Belt policy (PPG2) and the environmental enhancement policies (Option 2), and why?

Please tick one box       Option 1: Develop a Regionally Specific Green Belt Policy  
    Option 2: Apply PPG2

Please provide reasons (and where possible, evidence) for your answer.

*The district councils view is that Green Belt policy is a longstanding and successful one and we see no reason why it should be altered in favour of a more regionally specific one. Any attempt to dissolve the importance of the green belt especially around the urban fringe as the document suggests is something the district council would strongly oppose. As a district which is 91% green belt with the whole of our northern border being on the urban fringe the council sees it plays an essential part in maintaining that the focus of new development remains on the MUA in favour of widespread urban sprawl beyond this, the weakening of green belt policy in these areas could potentially encourage development which may harm the urban renaissance aims of the RSS.*

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## Safeguarding Mineral Resources

**Question M1:** Which Option on page 103 do you think will provide the most effective means of safeguarding the minerals the Region needs for the future? Please state why you have chosen a particular option and provide any evidence that you have to support your view.

Please tick one box     Option 1: Safeguard **Key** Minerals and Infrastructure  
                                   Option 2: Safeguard **All** Minerals and Key Infrastructure

Please provide reasons (and where possible, evidence) for your answer.

**No Comment**

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**Question M2:** Do you think that the WMRSS should provide for a higher level of policy protection for Etruria Marl through the designation of a specific regional safeguarding area?

Please tick one box     Yes                     No

If yes, please provide reasons for your answer.

*No Comment*

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If no, why do you think a higher level of protection is not required?

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**Question M3:** In relation to issues related to Safeguarding Areas (see page 99), should there be a different approach for safeguarding in rural and urban areas?

Please tick one box     Yes                     No

If yes, what should the approach be for urban and rural areas? Please explain the different approaches you would use and how you think they could be operated in those areas.

*No Comment*

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If no, please give reasons for your views.

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**Question M4:** What should the threshold for development be when consulting on non mineral developments in Minerals Safeguarding Areas (MSAs) / Mineral Consultation Areas (MCAs) An example could be as follows:



Non-Mineral Development in a MCA comprising more than:  
5000 sq metres for offices/retail/tourist/leisure/development  
2 hectares for any Use Class B1, B2, B8  
1 hectare for any residential development

Should the threshold be based on end use or developable areas in hectares? Should it be set at different levels for different minerals? Please provide your views and your reasons for them.

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## Safeguarding Mineral Resources continued

**Question M5:** What minerals related infrastructure should be safeguarded in the Region?

These could be for example:

Sites / facilities for concrete batching  
the manufacture of coated materials  
other concrete products

the handling, processing and distribution of substitute, recycled and secondary aggregate material using local rivers, inland waterways and rail.

Please state your reasons and provide evidence to support your view. Please provide a list of key sites/facilities that should be safeguarded.

*No Comment*

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What mechanisms should be used to safeguard these sites and facilities? For example, defining a buffer zone around each facility/site. Please state your reasons and provide evidence to support your view.

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**Question M6:** Do you think that minerals resources should be safeguarded in areas covered by national designations for landscape, wildlife conservation and cultural heritage?

Please tick one box     Minerals resources should be safeguarded in designated areas  
    Minerals resources should not be safeguarded in designated areas

Please provide reasons and where possible provide evidence for your answer.

*No Comment*

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**Question M7:** Is there a need for a regional safeguarding policy on coal? Please provide reasons (and where possible, evidence) to support your view.

Please tick one box     Yes                     No

If yes, what matters should the policy address?

*No Comment*

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**Question M8:** In updating Policy M4 (Energy Minerals) in the existing WMRSS is there a

need to place more emphasis on realising the opportunities available from existing technologies to release energy sources from worked and unworked coal seams in the coalfields of the West Midlands? Are there any other matters which an updated Policy M4 should address?

Please tick one box     Yes             No

If yes, please explain (and where possible, provide evidence) to support your view.

*No Comment*

.....  
If no, please explain (and where possible, provide evidence) to support your view.

.....  
Are there any other matters which an updated Policy M4 should address?

.....

## Future Supplies of Construction Aggregates

**Question M9:** Do you think that the indicative apportionment outlined in Table 4 on page 106 is realistic?

Please tick one box     Yes             No

Please provide reasons (and where possible, evidence) for your answer.

*No Comment*

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**Question M10:** Which of the three Options on page 109 do you think would provide both an adequate and sustainable supply of aggregates up to 2026 in the West Midlands?

Please tick one box     Option 1: Apportion future supplies by existing methods  
                                   Option 2: Apportion future supplies using different sub regions  
                                   Option 3: Apportion future supplies using different sub regions and methods

Please provide reasons (and where possible, evidence) for your answer.

*No Comment*

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**Question M11:** In relation to the contribution of alternate materials to future supply (see page 108), what additional policy guidance set out in Policy M3 (The Use of Alternative Sources of Materials) of the WMRSS is required to reduce the reliance on aggregates and increase the use of alternate materials in construction?

Do you have any suggestions for additional regional policies/guidance that could reduce the reliance on aggregates and increase the use of alternate materials in construction?

*No Comment*

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**Question M12:** Do you think that the provision of future supplies of aggregates in the Region can be determined by applying one or more of the following policies, provisions or concepts? Please tick the relevant boxes and give reasons for your choices.

- Future Patterns of Housing and Employment growth
- Existing Mineral Infrastructure
- Local Resource Availability
- Environmental Acceptability and Designations

- None of the above
- Other (please specify)

Please provide reasons (and where possible, evidence) for your answer.

*No Comment*

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**Question M13:** Do you agree with the Section 4(4) Authorities that the sub regions set out on page 106 are the most appropriate for carrying out any future sub regional apportionment of aggregates in the West Midlands?

Please tick one box     Existing Sub-Regions     Sub-Regions Proposed by Section 4(4) Authorities

Please provide reasons for your answer.

*No Comment*

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## Future Brick Clay Provision

**Question M14:** What policies do you think would best ensure that separate long term off site stockpiling of Etruria Marl and fireclays can be provided in the Region?

Do you have any suggestions for policies to ensure that separate long term off site stockpiling of Etruria Marl and fireclays can be provided in the Region?

*No Comment*

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**Question M15:** Which of the Options for meeting the shortfall in Brick Clay supplies (see page 117) would provide the most sustainable way of meeting the industry's future needs?

Please tick one box       Option 1: Regional Supply Requirement  
    Option 2: Supplies for Individual Brickworks  
    Option 3: Future Supplies from Resource Areas

Please provide reasons for your answer.

*No Comment*

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**Question M16:** Do you think that the 13 million tonnes shortfall in clay supplies could be met from quarries within the Region?

Please tick one box       Yes                       No

Please provide reasons (and where possible, evidence) for your answer.

*No Comment*

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**Question M17:** What planning and environmental criteria should be used to identify broad locations for the development of long term off-site stockpiles of clays (including fireclays)? Please provide reasons to support your views.

**Suggested Planning and Environmental Criteria To Identify Broad Locations For**

**Stockpiles Of Clays (Including Fireclays)**

- Proximity to brick clay supplies
- Proximity to existing brickworks
- Good access to road/rail
- Proximity to existing/future markets
- Long term accessibility
- Locations where it is possible to minimise/avoid significant environmental impacts
- Other (please specify)

Please provide reasons (and where possible, evidence) to support your views.

*No Comment*

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**Please send your completed questionnaire by post to:**

**WMRSS Phase Three Revision**

West Midlands Regional Assembly  
Regional Partnership Centre  
Albert House  
Quay Place  
92-93 Edward Street  
Birmingham  
B1 2RA

**Or by fax: 0121 245 0201**

**Or by email: [wmrss@wmra.gov.uk](mailto:wmrss@wmra.gov.uk)**

(Electronic copies of the questionnaire can be downloaded from [www.wmra.gov.uk](http://www.wmra.gov.uk))

**Or complete online: [www.wmra.gov.uk](http://www.wmra.gov.uk)**

(visit the Assembly's homepage for more details).

**All submissions must be received by 14th August 2009**

Any questions relating to the WMRSS Phase Three Consultation should be directed to the WMRSS Team at West Midlands Regional Assembly on **0121 678 1010** or [wmrss@wmra.gov.uk](mailto:wmrss@wmra.gov.uk)