

West Midlands Regional Assembly

Analysis of Responses to the West Midlands RSS Phase Three Revision Options Consultation Document

Final Report 6th November 2009



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Contents

1	INTRODUCTION	1
2	CRITICAL RURAL SERVICES	3
3	GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE	14
4	CULTURE SPORT AND TOURISM	24
5	QUALITY OF THE ENVIRONMENT	31
6	MINERALS	56
	ANNEX A – TABLE OF RESPONSES TO ALL QUESTIONS	74
	ANNEX B – FULL LIST OF CONSULTATION RESPONDENTS	81

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1 INTRODUCTION

The West Midlands Regional Assembly (WMRA) commissioned URSUS Consulting Ltd to collate and analyse the consultation responses to the Regional Spatial Strategy (RSS) Phase Three Revision Options consultation document. The Phase Three Revision addresses a policy areas of the RSS which were not addressed in the earlier two phases of the revision process.

In summary, the Phase Three Revision consultation covered:

- **Rural services** - identifying and prioritising the services that are critical to the sustainability of rural communities.
- **Gypsies, Travellers and Showpeople** - identifying the number of pitches and plots required for Gypsies, Travellers and Travelling Showpeople.
- **Culture, Sport and Tourism** - identifying and addressing gaps in the provision of international, national, regional and sub-regionally significant assets.
- **Environment** - further developing environmental policies in the RSS, including flood risk, air quality, renewable energy and uses of the Green Belt.
- **Minerals** - developing policies on safeguarding mineral resources and the future supplies of construction aggregates and brick clay.

The Options consultation document set out future development choices or directions for the Region up to 2026. The Options had been drafted by the Regional Assembly using advice from the Strategic Planning Authorities along with a wide range of background technical work. The consultation period ran from 29th June to 14th August 2009 and invited responses via electronic (including an online questionnaire) and postal submissions.

All responses were logged by the Assembly and passed to URSUS for analysis.

1.1 SUMMARY OF CONSULTATION RESPONDEES

A total of 442 responses were received, covering organisations and sub-regions as shown in the tables below. The responses provided good coverage of each of the five areas within the consultation document, with between 159-255 responses for each section.

Number of Responses by Organisation Category:

Organisations	No. of responses:	%
Local Authority - County or Unitary	27	6%
Local Authority - District	35	8%
Parish Council	48	11%
Non Departmental Government Body (NDGB)	19	4%
Social, Economic, Environment Partner (SEEP)	87	20%
Business	39	9%
Individual	75	17%
Individual – Gypsies and Travellers response (G&T)	112	25%
TOTAL	442	100%

Number of Responses by Sub-Region / Region:

Sub-Regions	No. of responses:	%
<i>In Region:</i>		79%
Herefordshire	16	4%
Shropshire	43	10%
Staffordshire	91	21%
Warwickshire	68	15%
West Midlands	86	19%
Worcestershire	47	11%
<i>Outside the Region:</i>		21%
East Midlands	35	8%
London	15	3%
North West	5	1%
East of England	1	0%
South East	10	2%
South West	9	2%
Yorkshire & Humberside	2	0%
Wales	1	0%
None given	13	3%
TOTAL	442	100%

Number of Responses by Section:

Organisations	Critical Rural Services	Gypsies & Travellers	Culture, Sport & Tourism	Environment	Minerals
LA - County or Unitary	14	22	18	19	23
LA - District	24	29	23	25	19
Parish Council	33	40	26	31	26
NDGB	10	5	15	15	11
SEEP	42	27	62	63	38
Business	12	4	13	18	16
Individual	24	31	23	29	41
Individual - G&T	0	97	0	0	0
TOTAL	159	255	180	200	174

The following sections provide analysis of the consultation responses, including quantification and qualitative analysis which summarises the range of responses and draws out common themes being made by respondents. Comments related to the consultation issues and questions only have been included in this analysis.

The analysis includes examples of quotes from consultees. Annex A provides a quantitative summary of responses to all questions, and Annex B provides a full list of the respondents.

OVERVIEW:

There were relatively large majority views on all the questions relating to Critical Rural Services.

- **Critical Rural Services (CRC1)** – A majority (64%) agree that it is difficult to define ‘critical’ services; but many also felt that it was important for the RSS to at least provide a generic list of services for rural areas.
- **Services in Accessible Areas (CRC 2)** – A majority (71%) agree that the RSS should enable more attention to be paid to meeting the service needs of people in “accessible rural” areas who have limited access to transport. However, there were also views that the RSS should not focus on any particular groups or areas, and that this issue could better be dealt with through Local Development Frameworks.
- **New development to reverse decline (CRC 3)** – A majority (63%) agree that new development in rural settlements lacking services can help to reverse service decline. However, respondents who disagreed emphasised that new development is no guarantee of better service provision, that it would spread resources too thinly and that any new development must meet local community needs (eg. affordable housing). Some recommended that service provision should be considered in the context of clusters of rural settlements. Some felt that identifying settlements needing better services is best dealt with at local / LDF level.
- **Options for rural service development (CRC 4)** - Support for Option 2 ‘Community Based’ approach (65%), combined with aspects of Option 1 ‘Sustainable – Climate Change Driven’ (22%). Option 3 ‘Status Quo’ was popular amongst Unitary and County Councils. A range of suggestions were given for the implementation of the different options.

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?

Organisations	Yes	%	No	%	No option ticked	Total responses
LA - County or Unitary	10	7%	1	1%	2	10%
LA - District	13	10%	4	3%	1	13%
Parish Council	20	15%	11	8%		23%
NDGB	8	6%	1	1%	1	7%
SEEP	23	18%	10	7%	1	25%
Business	2	1%	4	3%	1	5%
Individual	9	7%	11	8%	1	16%
Individual - G&T	0	0%	0	0%		0%
TOTAL	86	64%	42	31%	7	100%

64% of respondents to this question agree with CRC1 - including 23 out of 28 Local Authority respondents. A common view is that rural service needs vary so much by different locality and over time, that trying to identify those services which are regionally important or critical is not possible. Instead of a prescriptive list of critical services, the RSS policy could establish a framework of broad categories of critical rural services which local partners can draw upon in planning local service delivery. It would then be left to more detailed planning in LDFs to determine specific service provision issues for particular districts or settlements.

Examples of responses:

YES:

- The issues that exist 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. (Bromsgrove District Council).
- The approach should be an overarching RSS policy requiring the LDF to plan to improve accessibility to services and to tackle causes of economic deprivation through access to employment and affordable housing. It is for the LDF and LSPs to plan how this might best be achieved and then to monitor change against this. (Telford & Wrekin Council)
- Whilst it may be helpful to provide an indicative list in the explanatory text of the RSS that may assist policy decisions at the LDF level, it would not be practical to set out a list in RSS policy that would be likely to be relevant across the region or be definitive. Local determination would be likely to be more appropriate in order to better reflect the needs and aspirations of local rural communities. Whilst not advocating a list in the policy we do recognise that a form of list would be advantageous in regards to helping to monitor the viability of rural services within the region. (Worcestershire County Council)
- Needs for service provision are particular to and vary from community to community and in time. A set list would therefore be constraining. Nevertheless, there will be common service requirements around infrastructure, including broadband quality and access, and opportunities to encourage and promote social resilience through capacity-building and recognition of the role and potential of the voluntary and community sector. Shropshire would be supportive of the RSS indicating the broad scope of services that rural communities may require, and stressing the importance of services for rural communities, but leaving it to the local authorities and other delivery agencies to define key services and bring forward strategies appropriate to the local context. (Shropshire Council).

NO:

- The easy option of not defining services which are important will mean that services are overlooked and not supported. Base line services will always be relevant - eg. shop, transport, post office, community hall. (Hereford & Worcester Gardens Trust)
- Agree that it is difficult to provide the distinction between 'critical' and 'important' services at a regional level as each rural area (village, hamlet, market town etc) will be very different in terms of many different factors such as its demographics, its location, its proximity to urban areas and so on. However, it is too simplistic to dismiss the definitions as being of little value. What is needed is flexibility to support need as determined locally and the infrastructure resources to enable this to happen. (Cannock Chase District Council)
- WMRSS should provide a framework and appropriate information which enables Core Strategies and other DPDs to develop 'bespoke' criterion for specific rural settlements. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response).

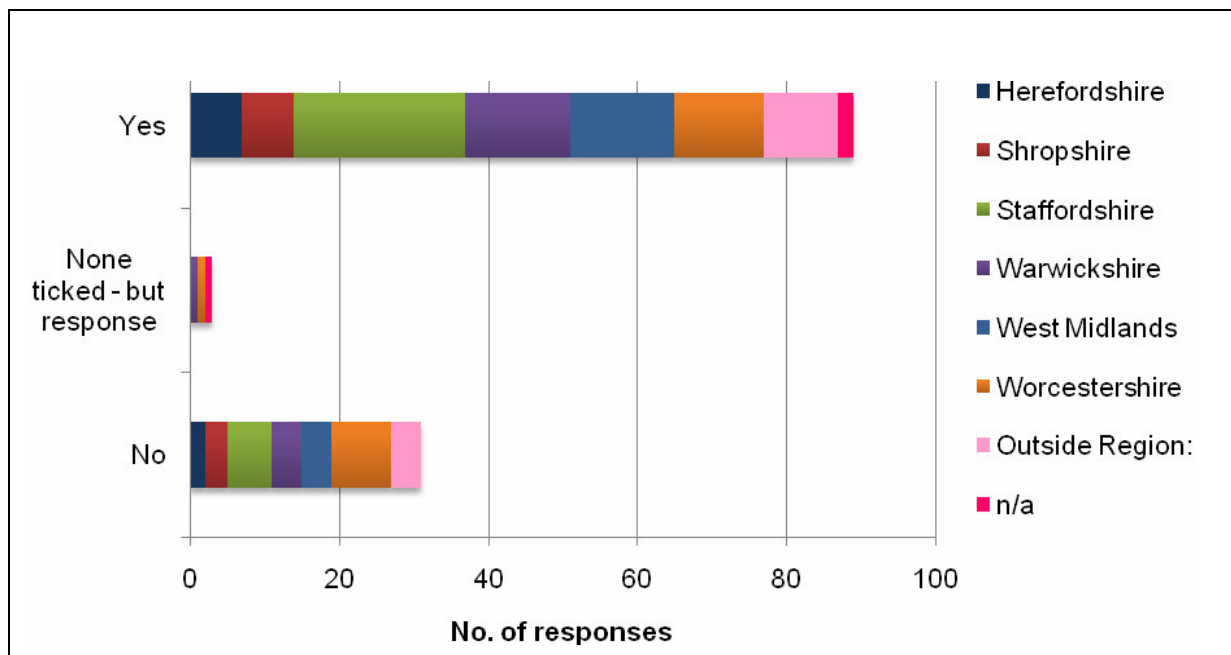
NONE TICKED:

- We recommend there should be a 'framework definition' that ensures the link between employment, other services and housing. It is important that the region has a common understanding of what these services include; therefore it is considered that the presence of a 'list' of services is not enough to create sustainable rural communities. Some flexibility is needed as a 'list' may be too constraining and certain rural areas currently function with or without certain services. (AWM)
- In view of the issues in some rural areas, especially those that are remote from major urban areas or strong service centres, it is right in principle to seek to safeguard and where possible and appropriate, improve rural services. However, it will be important to ensure that services and developments are to meet local needs and are proportionate to those needs. This will be especially important in areas that are close to the Major Urban Areas (MUA). Otherwise, the process of decentralisation from the MUA could be encouraged to continue, undermining the Urban Renaissance strategy of the RSS. (WM Planning & Transportation Sub-Committee)

- It ought to be possible to draft a policy that emphasises the need to ensure that key services required on a daily or weekly basis are accessible to all living in rural settlements, with examples for illustrative purposes....The examples need not be exclusive, and could be added to by local planning authorities in their LDFs in the light of local circumstances and priorities. (West Midlands RTPI)
- The existing RSS contains policies and supporting text that enables local consideration that should not be hindered by more prescription at the regional level. (Staffs and Stoke Planning Forum)

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?

Organisations:	Yes	%	No	%	No option ticked	Total responses
LA - County or Unitary	7	6%	4	3%		11
LA - District	14	11%	4	3%	1	19
Parish Council	25	20%	5	4%	1	31
NDGB	4	3%	4	3%		8
SEEP	19	15%	12	10%	1	32
Business	5	4%	0	0%		5
Individual	15	12%	2	2%		17
Individual - G&T	0	0%	0	0%		0
TOTAL	89	72%	31	25%	3	123



72% of respondents to this question agree that more attention should be given to meeting the service needs of people in “accessible rural” areas whose access to transport is limited - including 21 out of 30 Local Authority respondees. Responses showed no particular sub-regional patterns.

Whilst the majority answered “yes”, comments include that the RSS should advocate improved accessibility within the rural community and should not necessarily focus attention on the particular groups or areas. There is no particular reason why accessible rural communities should be given precedence over more remote rural areas. Some identified the need to define accessibility – not just in terms of access to transport. Some question the role of the RSS on this issue, stating that it is

important to consider the needs of each community through community planning and then draw this together at the District level into the Local Development Frameworks, Local Transport Plans etc.

YES:

- More attention should be given to the needs of this group. The question is how this may be achieved e.g. Broadband access and community transport arrangements to facilitate access to services in nearby urban centres etc. However the needs of this group should not be seen as a priority over other areas of service deprivation. A comprehensive policy approach is required. (Wyre Forest District Council)
- The inevitable and appropriate focus on service delivery in more sustainable locations is likely to continue to place continually greater reliance on transport in rural areas. This can only be tempered by improved public transport provision and flexible and innovative service provision. (Rugby Borough Council)
- Yes – South Staffordshire would fall into this category in that the conurbation provides a number of services for our residents but transport into the conurbation from these areas is limited in many places. However, in policy terms we're not sure of the role the RSS could play in meeting these needs...local solutions need to be identified for local circumstances. (South Staffs Council)
- In regional terms, Stratford-on-Avon District is considered to be an 'accessible' rural area. However access to services is a key issue for our rural population, and in many cases is dependent on access to private transport. This is a particular challenge for certain groups, such as low income households, who may not have access to a private car or use a high proportion of their income on transport costs. We consider that the RSS should pay more attention to meeting the needs of this group. (Stratford-on-Avon District Council)

NO:

- The key issue is to consider the needs of each community through community planning and then draw this together at District level into the Local Development Frameworks, Local Transport Plans etc. There is no particular reason why accessible rural communities should be given precedence in this respect over more remote rural areas. An integrated approach is required which considers all rural areas together. (Cannock Chase AONB)
- Any rural policies seeking to address access to services should not be concerned purely with one group's needs, but should provide a comprehensive policy to tackle service deprivation across all members of rural communities.....Furthermore, accessibility to services is also a reflection of an individual's circumstances i.e. mobility, health, age or income. For this reason, an emphasis on groups supposedly defined as living in "accessible rural locations" is considered to be unhelpful in formulating future policy. (Worcestershire County Council)
- The needs of all rural communities need to be address and focusing 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 peoples 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. (Bromsgrove District Council).
- Meeting service needs is important wherever they arise. Different approaches to meet needs may be appropriate and viable in different areas and this can only be determined at the local level. The Council focus is to use the national Index of Multiple Deprivation (IMD), and national research findings, alongside other more local evidence drawn from sources including parish plans, rather than a service-deficit approach. This is in order to facilitate a balanced and inclusive approach to meeting the accessibility needs of a range of client groups. (Shropshire Council)

NONE TICKED:

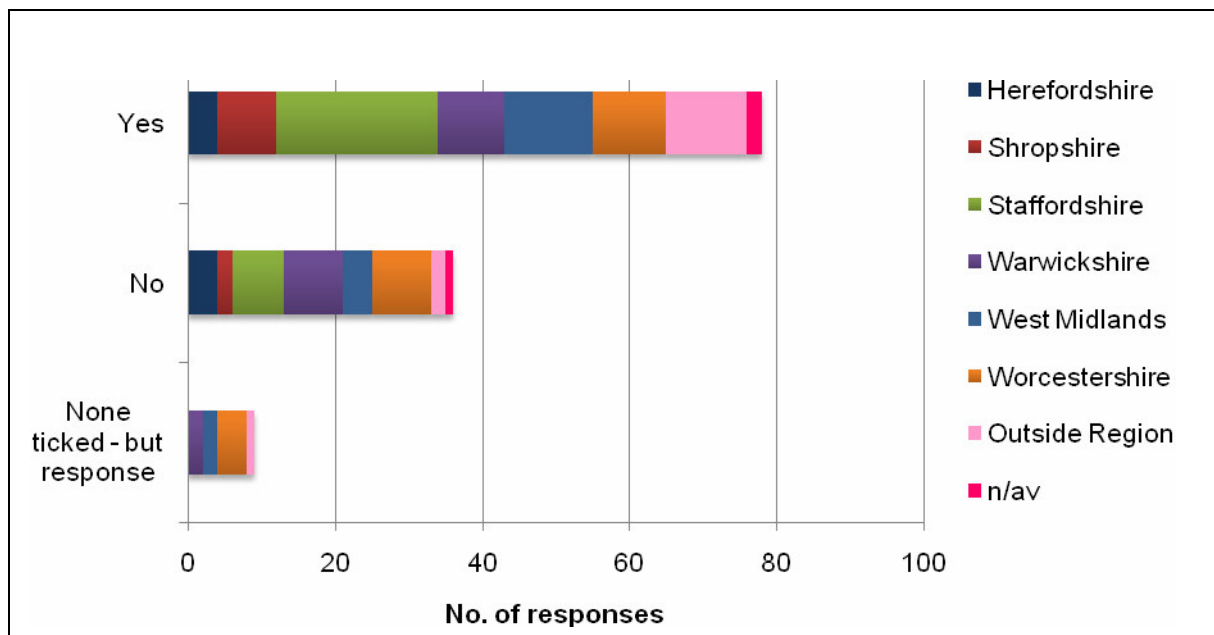
- The regional plan should advocate improved accessibility within the rural community and should not necessarily focus attention on the individual. However, we consider that the approach to addressing service needs within the rural areas adopted by the emerging Phase 3 review appears to be somewhat 'mechanistic' with respect to attempting to address the needs of rural communities through the land use system rather than in a genuinely spatial way. The delivery of community health programmes (peripatetic

services), distant learning and training, employment opportunities, providing incentives and support for community development schemes, community transport and rural business support can have a more significant and lasting effect upon tackling rural deprivation than new physical development. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response)

- We confirm that significant numbers of rural people experience serious disadvantage across all rural areas ... There is therefore a need to focus attention on those unmet needs ... However, it should also be borne in mind that it may be preferable to promote and enable solutions which also embrace a wider range of rural needs, for example sustainable public or community transport which meets the `mainstream` needs of people travelling to work, market town shops, rail/coach stations etc. Obviously such initiatives will need to be economically viable (albeit if necessary with help from public subsidy) and convenient to a wider section of the local population. But crucially, it should also help disadvantaged groups too, and avoid their social and economic marginalisation. (Commission for Rural Communities)

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?

Organisations:	Yes	%	No	%	No option ticked	Total responses
LA - County or Unitary	8	7%	2	2%	1	11
LA - District	10	8%	7	6%	2	19
Parish Council	14	11%	15	12%	1	30
NDGB	6	5%	1	1%	2	9
SEEP	22	18%	7	6%	3	32
Business	6	5%	0	0%	0	6
Individual	12	10%	4	3%	0	16
Individual - G&T	0	0%	0	0%	0	0
TOTAL	78	63%	36	29%	9	123



63% of respondents to this question agree that new development should be allowed in settlements lacking a service base in order to help reverse a cycle of decline in such places - including 18 out of 27 Local Authority respondees. As shown in the chart above, there were no particular sub-regional patterns in the responses.

Respondents often emphasise that new development should be allowed only if it meets local needs, brings more affordable housing, avoids negative impacts on the environment and is accompanied by appropriate service and infrastructure provision.

A number of responses recommend that it is sometimes appropriate for service provision to be considered across clusters of rural settlements and hierarchies.

Many respondents who disagree strongly with the statement in CRC3 argue that allowing new development is no guarantee that services will be improved; it would result in limited resources for funding service provision being spread too thinly; and that a new development would need to be relatively large in order to bring with them increased or new services.

In addition, some question whether this policy would be consistent with the urban renaissance thrust of the RSS and also feel that identification of settlements where services need to be developed is best dealt with at a local level via LDFs, rather than requiring a RSS policy.

YES:

- A core service base is essential for their sustainability. However, development must be sensitive to the sustainability of the rural environment. (Kenilworth Town Council)
- Appropriate development of the right type and scale including addressing service needs is part of a rounded approach to encouraging sustainable communities. A veto on developments in settlements which lack a service base will not achieve this. (West Midlands Rural Affairs Forum)
- Our view would be better expressed as stating that new development may be allowed in certain settlements on the basis that it will help to make services (existing and/or new) more viable, and more sustainable. But it may not always apply: we know that there is no simple relationship between size of settlement and service viability, and much will depend on local circumstances.... In some cases it may be helpful to consider the clustering of settlements to share services between several villages which are in reasonably proximity and connectivity. It will be important, therefore, to undertake careful assessments of each location, in collaboration with local communities themselves. (Commission for Rural Communities)
- Rural communities are dependent upon a range of neighbouring communities and it may well be that one provides the school for example, whilst another provides the shop or even a mobile service etc. Total moratorium on planning/development in rural settlements therefore not only stagnates or distorts them but also potentially damages neighbouring services. ...Appropriate mixed development needs to be allowed therefore in order to help keep balance and services within communities. (RICS)
- But only where it can be demonstrated to help meet local needs and the sustainability of the settlement....There is little current evidence that supports the view that increasing populations in rural areas will lead to greater service provision. However, development in the rural areas has been constrained in recent times and the effect of more recent local needs surveys and Parish Plans on the sustainability of rural communities and rural services has not yet been tested. The Council also consider this general approach to rural development is consistent with national policy in paragraph 38 of PPS3 and are currently consulting the public as to its appropriateness in Warwick District through its Core Strategy Preferred Options. (Warwick District Council)
- Small rural villages often work together as clusters and this can be developed by working through the LDFs at a local sub regional level with the appropriate development for the area. One size fits all is not appropriate within a single Authority or across the WM area. (Kington Town Council)
- Some limited development to meet specific local needs e.g. affordable housing should be supported. However, it is questionable whether it is possible to affect the service base without a significant scale of development that is likely to be contrary to the overall RSS. (Staffordshire County Council)
- There is also recognition by stakeholders that investment needs to be focussed more broadly than at market towns. ...The emerging policy direction of the Council is that development that demonstrably meets the needs of the local communities, such as affordable housing and economic diversification, will be permitted in rural settlements, whilst protecting the countryside from wider development pressures and widespread new building. A key element of achieving this through the planning process is to seek to rebalance the housing stock and encourage social and economic vitality, through greater emphasis on the type of development in: local centres; community hubs; and community clusters. (Shropshire Council)

- There should be the support at a regional level to enable Local Development Frameworks to determine where development should be allowed in rural areas and what sort of development this should be. This would mean that villages have the support they need to avoid decline and become vibrant and sustainable settlements in their own right. (Cannock Chase District Council)

NO:

- Because of limited resources, a honey pot type of approach should be taken in deciding where to provide services. (Member of Stafford Borough Council)
- Identifying settlements where there may be service deprivation is best dealt with at a local level; it is not necessary for RSS to contain a policy. In some cases LDF's may seek to locate development where existing services are fragile but in other cases access to employment or support for public transport services may be equally important. These sorts of choices need to be made in consultation with the local community and in the context of their unique circumstances. The value of RSS policy is to establish the general rural zones where development needs to be restricted to support urban renaissance on the one hand and zones where increased population is required to support rural renaissance on the other. Existing RSS policy already does this. (Telford & Wrekin Council)
- It is likely that a large amount of new development would be needed to support services and reverse the cycle of decline. This could undermine service provision within settlements with a service base by 'spreading the jam too thinly'. (Newcastle under Lyme Council)
- No, because this advice is inconsistent with national planning guidance.... Overall, the proposed view appears to suggest that development should be allowed to proceed without reference to the need to provide the infrastructure and services that will be needed to support new development. For an infrastructure provider like the Police Service, who have to ensure that each new development is within range of acceptable response times for example, this viewpoint cannot be supported. (West Mercia Police - on behalf of all Police Authorities in the West Midlands).
- Some development can be allowed in smaller, rural settlements but only as part of a wider development strategy which recognises the role and service functions of other settlements in a locality including larger villages and market towns. It is a very simplistic notion to assume that by directing increased levels of development to a settlement this will guarantee the prevention of loss of facilities or allow for the introduction of additional provision. (Lichfield District Council).
- The provision of new development in small rural settlements does not result in the maintenance of existing services, let alone the provision of new services.The Board notes the scale of development identified in Shropshire as being required to provide sufficient new primary school pupils to justify retaining or providing additional teaching capacity. Significant development was permitted in a settlement (Coates) in the Cotswolds AONB on the 1980s but this has not resulted in the retention of existing services let alone the provision of additional services. The contrary result was achieved - more commuting to larger settlements for employment and service provision and loss of local services – shop, primary school. However, the Board is very supportive of affordable housing development in villages which can be shown to meet a defined local need, both for housing and to meet local employment opportunities. (Cotswolds Conservation Board)

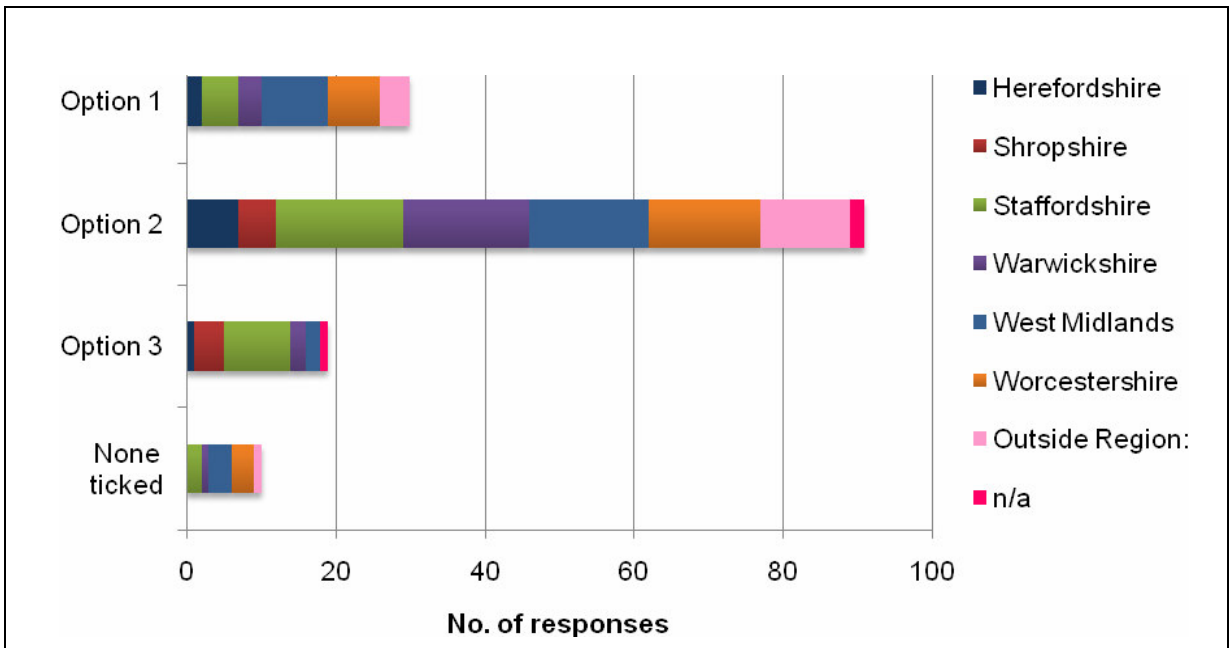
NONE TICKED:

- It is not considered that this question can be answered with a simple yes or no. There are some very small communities that are so small that no realistic amount of development will enable service provision or make them more balanced or sustainable places. In Rugby Borough these small settlements are washed over with either a countryside or greenbelt designation. There are however a higher tier of villages that can support some limited levels of development in order to, in turn, support services and prevent the decline of the village. (Rugby Borough Council)
- The answer to this question needs careful consideration if it is not to undermine the policy of urban renaissance within the RSS Put simply, whilst the provision of additional housing in rural settlements may in some cases help to secure certain services, this may only be achievable once a certain threshold has been crossed. Ultimately, services would still be at the whim of market, political and budgetary constraints. However, if such an approach is taken, it may be better (as with the South Worcestershire Joint Core Strategy) to identify settlements within a hierarchy to which development should be directed and service provision that can serve a number of settlements within a cluster. (Worcestershire County Council)
- This depends what is meant by new development. If this led to a market free-for-all on such rural settlements, consequences would be negative on any remaining local indigenous services (and jobs) and on area character. But for rural employment, social cohesion and service access reasons, a blanket ban on new development has negative consequences for area decline. New development should be invited and permitted in such settlements in line with service needs identified by the local community and of a scale to meet the needs of that community rather than to compete with neighbouring centres - approximately as described in CRS Option 2. (Localise West Midlands)
- We do not believe that this is likely to be effective. We believe that to stand a chance of being effective the scale of such development would undermine the RSS strategy and would conflict with climate change and sustainability objectives, including resource depletion, farming land conservation and protection of the rural environment. However, that does not mean that very small scale development should not take place to cater for local needs and to assist in sustainability. This includes the provision of affordable housing for local people but it must be recognised that this need to go hand in hand with access to services and employment. (Campaign to Protect Rural England (West Midlands))

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.

	Option 1- Sustainable – Climate Change Driven	%	Option 2- Community Based	%	Option 3 – Status Quo	%	No option ticked
Organisations:							
LA - County or Unitary	1	1%	4	3%	9	7%	1
LA - District	5	4%	16	12%	2	1%	2
Parish Council	5	4%	21	14%	3	2%	1
NDGB	5	4%	5	4%	1	1%	1
SEEP	9	7%	26	19%	3	2%	4
Business	3	2%	4	3%	0	0%	1
Individual	2	1%	15	11%	1	1%	1
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	30	22%	91	65%	19	14%	11

Note: Option 1 + 2 = 10 responses. Percentages based on the 139 respondents.



There is strong support for Option 2 Community Based approach (65% of respondents), including 16 of 21 District LA respondees; plus also support for Option 1 (22%) and a combination of Options 1 and 2.

A number of respondees emphasised that Option 1 and Option 2 should not be mutually exclusive, and ideally that a 'community based' approach at the local level should incorporate 'climate change' considerations. In particular Option 1 item (b) "Use of ICT", and item (d) "Improvements to public transport" are seen as relevant to both Options 2 and 3 and are important considerations whichever Option is chosen.

Those preferring Option 2 favoured it because it would enable the development of local solutions through a community led approach to reflect the needs of individual communities.

Option 3 Status Quo is popular amongst 9 of the 13 County and Unitary Authorities who see the existing policy as providing adequate support for the local consideration of relevant circumstances and were concerned that Option 2 might give rise to unreasonable expectations.

- An important issue for rural LDFs particularly Shropshire and Herefordshire. The WM Rural Delivery Framework identifies fair access to services for all as a priority for the region. We recognise it is difficult to define 'fair' but note there is a consensus among stakeholders that this is related to social justice and sustainability. To achieve an appropriate focus on community-led definitions of service needs and their scale and location, it will be important to ensure a suitable policy framework is in place to guide work at local level. This would be most appropriately taken forward under SRS and would be consistent with PPS4 once finalised.. (GOWM)
- Overall AWM does not support any particular option set out in the consultation; indeed we conclude that the extent of the review of rural policy needs to be broader given the issues. There are elements in option 1 and 2 that may enable a strategic policy context to be developed, albeit for a wider review of rural issues:
 - that recognises and harnesses the economic issues;
 - that sets out a broad framework and/or outcomes based approach to empower tailored solutions that recognise the diversity of the rural context which stem from a rich variety of social and economic factors;
 - that seeks to encourage effective engagement with the local community and stakeholders;
 - that does not set unrealistic aspirations for service provision. (AWM)

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.

Option 1: Sustainable – Climate Change Driven. Suggestions for delivery included: guidance on the ways in which local planning authorities should identify, in their development plans, which settlements are considered to be suitable for service development, including a focus on market towns; through on-going work on local core strategies which will identify service needs; improved public transport; and by developing more of a vision for rural communities in the region and highlighting the interdependence of urban and rural areas.

- A revised Policy RR4/CRC4 will need to clearly show how through the preparation and implementation of Local development Frameworks and other associated plans and strategies access to services and facilities can be improved without the need for travel or by limiting the use of energy to achieve the same. (Lichfield District Council)
- Provide a robust framework for limiting new development in the rural areas and focus new development on the Market Towns. This could then be successfully interpreted at the local levels through LDF. (Wyre Forest District Council)
- 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 ensure the service needs of all rural communities are met. (Bromsgrove Council)
- Improved public transport links. A good selection of mobile facilities. Provision of a mobile hub. (Tanworth-in-Arden Parish Council)
- In order to deliver Option 1, the RSS should continue to use the definitions for Market towns contained within existing Policy RR3. The policy should be developed so that it provides guidance on the level of growth/population required to support critical services. The policy should also contain guidance on the ways in which local planning authorities should identify, in their development plans, which settlements are considered to be suitable as a focus for protecting and enhancing service provision via additional growth. (GVA Grimley for Enville and Staleybridge Estates).
- The delivery of rural services needs to be considered alongside services in urban areas as the two are clearly linked. We consider that the Critical Rural Services section should build on Policy SR2 Creating Sustainable Communities by developing more of a vision for rural communities in the region and highlighting in the policies the interdependence of urban and rural areas. (Cotswolds Conservation Board).
- The RSS needs to set out clearly where the responsibility for improving rural services lies. (CPRE)

Option 2: Community Based. Suggestions for delivery included: by providing a suitable policy framework to guide work at local level and on the scope and nature of service reviews to avoid the risk of generating unrealistic wish lists; through local authorities working more closely with service providers, parish councils or other local groups; through well aligned and integrated working among local communities, local delivery partners, local authorities and the Regional Planning Body; enabling a flexible approach which responds to local circumstances; and drawing on the lessons learnt from the Shropshire Pathfinder pilot.

- One of the concerns with Option 2 is that this option could generate unrealistic wish lists for services in unsustainable locations. The scope and nature of service reviews may have to be carefully prescribed at the regional or sub regional level to try and avoid this. It would seem that the key to the policy being workable is in careful management. (Cannock Chase District Council)
- Preferred option is Option 2, although elements of Option 1 are also supported. To be effective, Option 2 needs to be communicated and delivered at the local level through local authorities working more closely with service providers, parish councils or other local groups, such as Community Forums, in improving service provision and the sustainability of rural communities. Regional policy can help by providing the framework and direction for that process to take place. (Warwick District Council)
- The role of regional transport planning functions is important to improve rural connectivity within the region. (Town and Country Planning Association)
- The bottom up approach suggested should be implemented but by facilitating not just active and articulate

local residents and amenity groups but also poorer and disenfranchised groups together with local business and service providers to identify service needs and the employment, tourism and residential development required to facilitate and support needs. The regional plan should set the parameters for appropriate service provision according to settlement size and proximity to larger centres. (British Holiday & Home Parks Association Ltd)

- The strategy should embed the necessary principles to enable delivery incorporating and building upon current (and future) good practice and in particular lessons learnt from the Shropshire Pathfinder pilot. Flexibility has to be a key ingredient here to allow for imaginative and at times unique solutions that work effectively for even the hardest to reach communities. (RICS)
- Quality rural transport links, including good rural public transport services, are essential in order to ensure that rural one stop shops for services can be effective, and the RSS should incorporate the inter-play of transport improvements in its widest sense to the aim of improving rural public services. (West Midlands Business Council)
- The provision of rural services needs linking very closely with the wider agenda for the development of the County through the Sustainable Community Strategy. (This should also include consideration of local economies including appropriate small businesses.) The RSS policies must allow the flexibility for these issues to be dealt with in a comprehensive manner in our own Core Strategy rather than have an overarching philosophy of styles and types of service provision imposed at the Regional level. The Regional Planning Body will need to consult with local authorities to establish a preferred methodology for any service audits and monitoring needed to ensure consistency of approach. (Herefordshire Council)
- Through parish plans, in conjunction with local authorities. (Hartlebury Parish Council)

Option 3: Status Quo

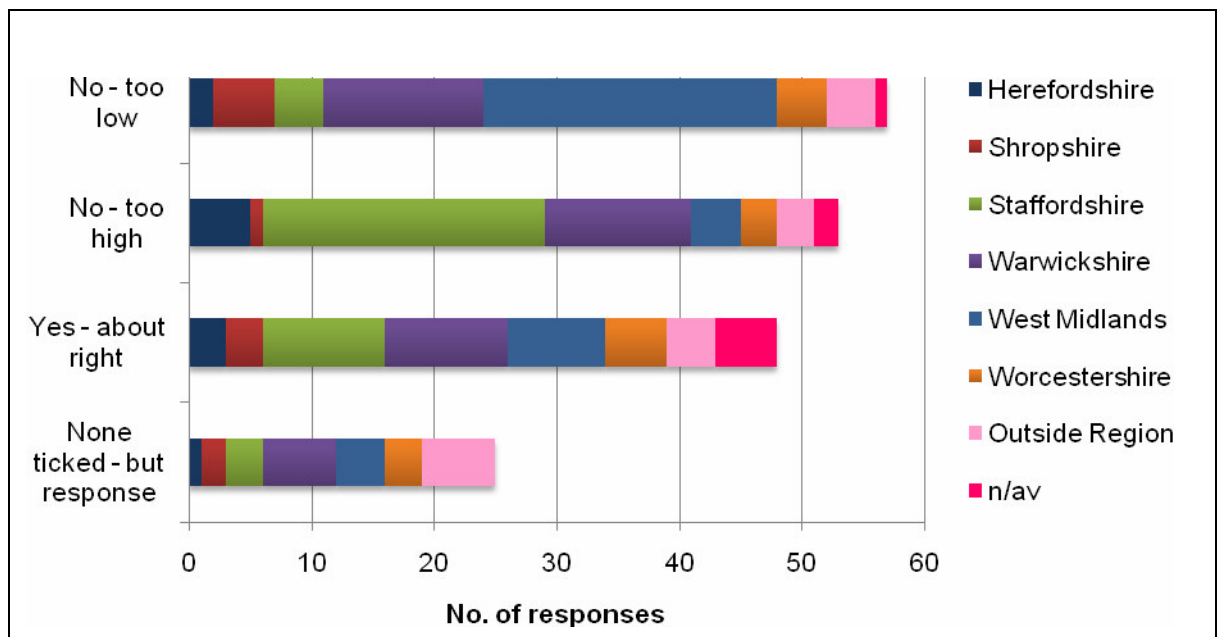
- As with a number of other issues, the region would probably be best served by the provision of broad enabling policies that provide for local consideration/determination together with Good Practice daughter documents that could provide examples of the various ways in which specific local issues might be tackled. (Staffordshire County Council)
- Policy RR4 provides a robust framework but needs to be positively and proactively applied. It needs to be more explicit in recognising the uniqueness and diversity of rural communities and how the people of those communities engage as individuals and collectively with local centres such as market towns and with larger centres. Higher profile leadership on the issue at regional level would help delivery and add value. This could be through: a) Recognition of the role of elected members as community leaders, b) Consistent and coherent sharing of best practice including more cross border working, and better use of innovative approaches; c) More overt links to the aspirations set out in sustainable community strategies and in parish plans; d) Greater emphasis on partnership working in service delivery; e) Greater recognition of the value of community led engagement mechanisms in identifying and achieving realistic outcomes for and with communities; f) Better use of evaluation mechanisms in partnership with rural communities; g) Greater recognition of the role and potential of the voluntary and community sector, and other advocates for particular client groups, in aiding capacity building and resilience of rural communities. (Shropshire Council)
- Regional policy should provide the overarching framework for the development of local policy and should encourage fair access for all. The specific details of Local Development Framework policies should be determined at the district/borough level in consultation with local communities to ensure local distinctiveness. This approach will include the provision of initiative led delivery mechanisms e.g. to facilitate better access to services. The provision of funding at the regional level to enable the delivery of initiatives is therefore considered critical. (Telford & Wrekin Council)
- With input from the people concerned. (Staffordshire Moorlands)

Overview of Gypsies, Travellers and Travelling Showpeople

- Responses were polarised and some contentious answers.
- Common pattern across questions on permanent, transit and travelling showpeople pitches:
 - Pitch requirements about right: mainly metropolitan authorities and NDPBs.
 - Pitch requirements too high: districts, parishes & individuals – some areas mobilised many individual responses.
 - Pitch requirements too low: G&T individuals on the basis of omissions from GTAA, growing families, overcrowding and unauthorised camps.
- Strong feeling that additional provision should be in urban, rather than remote rural areas.
- Concerns that areas which are already providing pitches (both regulated and unregulated) will be expected to ‘bear the brunt’ of additional pitches or that existing uneven patterns of distribution will be reinforced by the proposed options.
- On options for allocating the provision of residential Gypsy and Traveller pitches, there was no clear preference for Option 1 (demand led), Option 2 (planning led) or Option 3 (redistribution). A vociferous minority argued for greater, even 100% redistribution of existing pitches on the basis of greater equity and a wider choice of locations for Gypsies and Travellers.
- A majority view that pitches should be allocated at a County level as more flexible, efficient and likely to promote joint working.

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

	Total Responses	Percentage
Yes about right	48	26%
No of which:	113	61%
No – too low	57	31%
No – too high	56	30%
No option ticked but comments given	25	13%
Total detailed comments	148	



186 responded to this question of which 148 submitted detailed comments. The high level of responses illustrates that this is a sensitive issue and has given rise to both polarised views and a number of very controversial comments. Overall, the suggested pitch requirements and their distribution are of particular concern to District and Parish councils, many of whom challenge the robustness of the Gypsies and Travellers Accommodation Assessment (GTAA), suggesting that the numbers it generates are an overestimate of need and arguing that the aspirations of the Gypsy and Traveller community need to be balanced with the nature and needs of adjacent 'permanent' communities.

- A minority (26% of respondees) agreed that the proposed 939 pitches identified by the GTAA were 'about right'. The prevailing view in this group is that the GTAA is the most robust data available and a valid basis for predicting need. Nevertheless, CPRE highlights the fact that future needs are only assessed to 2012 or 2017 compared to the RSS which covers the period up to 2026. In the light of uncertain levels of increase in travelers (including from accession countries) there is a risk that there will only be a short term amelioration of the problem of lack of sites. It is thus essential that the process for keeping allocations up to date is clear in the RSS.
- Some 31% of respondents (57 in total) feel that the numbers are too low. This group is dominated by individuals from the Gypsy and Traveller community and people working with them. Many argue that figures are too low because: people have been left out of the GTAA; their own experience of growing families, children are having to leave or move into houses when they marry suggests shortages not picked up by the GTAA; or their experiences of overcrowding, being moved on or forced to use 'unauthorised sites'. They argue that there is large latent demand in some areas which is not fully reflected in the GTAA.
- Some 30% of respondents (56 in total) consider the numbers too high. Amongst this group a fundamental concern is about the basis used for assessing the need for pitches with the assertion that numbers are inflated by aspirations rather than proven need. Some respondents (such as the South Worcestershire Authorities) argue that the GTAA methodology lacks the robustness of Housing Needs Surveys and that more systematic research is needed to ensure that the results of needs assessment accurately reflect future needs¹. Objections reflect local perceptions of need (or perceived lack of it) in specific areas based on current vacancies on LA sites and long term tolerated sites (including a few comments from the G&T community about vacancies in areas such as Herefordshire). A large number of responses were received from councillors from Staffordshire County Council, South Staffs District Council and Stafford Borough Council as well as Staffordshire Moorlands and East Staffordshire Council stating that: the proposed numbers for Staffordshire are extreme overestimates; the area already over-provides sites; and there is no need for any more. Other areas that consider the numbers too high include Rugby, South Worcester (Malvern Hills, Wychavon and Worcester City), Herefordshire and the Black Country. Parishes which consider the numbers too high include: Shelton-Under-Fosse, Harborough Magna, Swindon, Norton Juxta Kempsey, Tredington, Shilton, Kington, Maddeley, Shotteswell, Loggerheads and Salford Priors. More than 20 responses were received from Wolvey Parish in Leicestershire alone. Respondents from Herefordshire and South Worcestershire suggest the numbers would result in an oversupply of sites and highlight the fact that most farm work is now done by seasonal European workers rather than Gypsies and travellers as in the past. Wychavon District Council points to the fact that a number of long standing 'tolerated' sites in horticulture/agricultural producing areas such as the Vale of Evesham have not been regularised (despite opportunities for families living there to apply for certificates of Lawfulness) and so are included in calculations of unmet demand and distort calculations of future need.

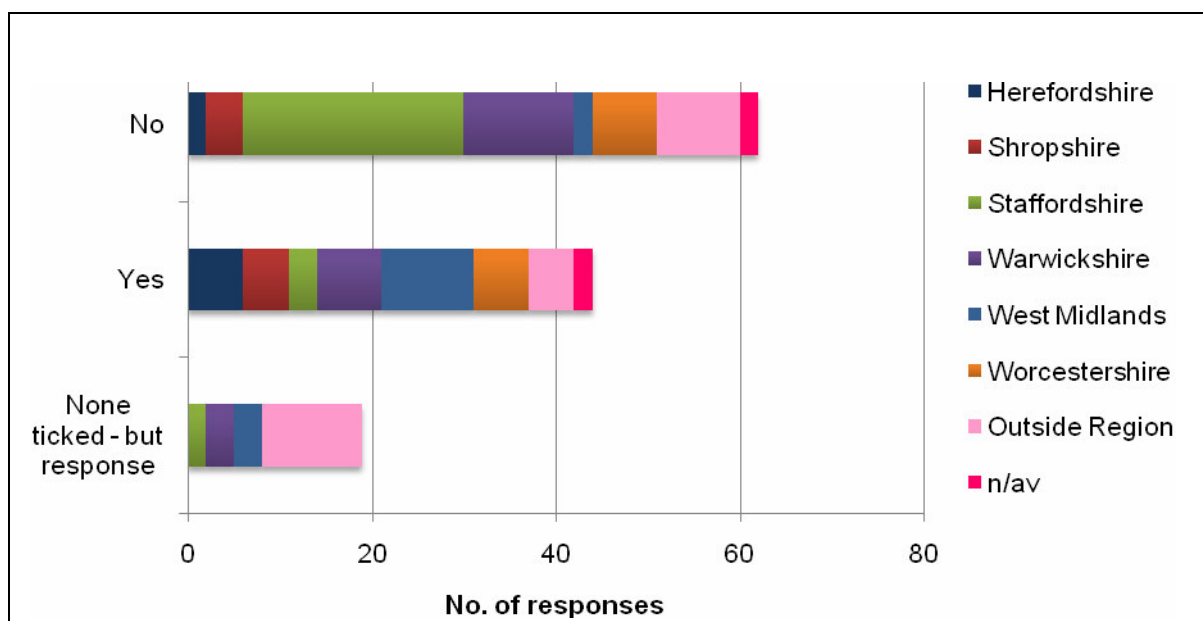
(1) ¹ One of the gaps for the South HMA GTAA was identified as the lack of figures for residential pitches for Years 6-10, and that applying a standard growth rate assumption of 3% for these years to an inaccurate baseline risks over inflating future needs assumptions.

This group also included a number of strongly-worded (and some negative) responses from individuals in rural parishes which already have experience of G&T sites or have substantial transient populations (eg Wolvey and Shilton). Many respondents reported that they felt their areas were expected to 'bear the burden' of new pitches which would more appropriately be located in urban areas where work opportunities are increasingly found, particularly around Birmingham.

- 13% of total respondents felt unable to judge whether the proposed numbers are correct, mainly based on their assessment that the GTAA does not give a robust empirical basis for making judgements. Countryside Council for Wales questions whether the needs of European seasonal workers has been included. Several respondents questioned where the finance will come from for developing new public sites.

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?

	Number	Percentage
Yes	43	34%
No	62	50%
No option ticked but comments made	20	16%
Total	125	100%



Of the 125 responses to this question, 34% (44 in total) agreed that the three options provided a good range of solutions, but 50% felt that they did not; while a further 16% were undecided.

In support of the options, the Metropolitan authorities report that the process of developing the options has afforded a comprehensive level of officer engagement across the West Midlands, and have regard to best practice from other areas. Others that agreed with the range of options also included those that felt that number of pitches was either too low or too high (eg. in Staffordshire).

Of the substantial majority who feel that the options are insufficient or are not sure, the main reasons given are that:

- Options are simplistic, and give neither an equitable spread across the region or reflect the preferences of the G&Ts for sites in proximity to urban areas.

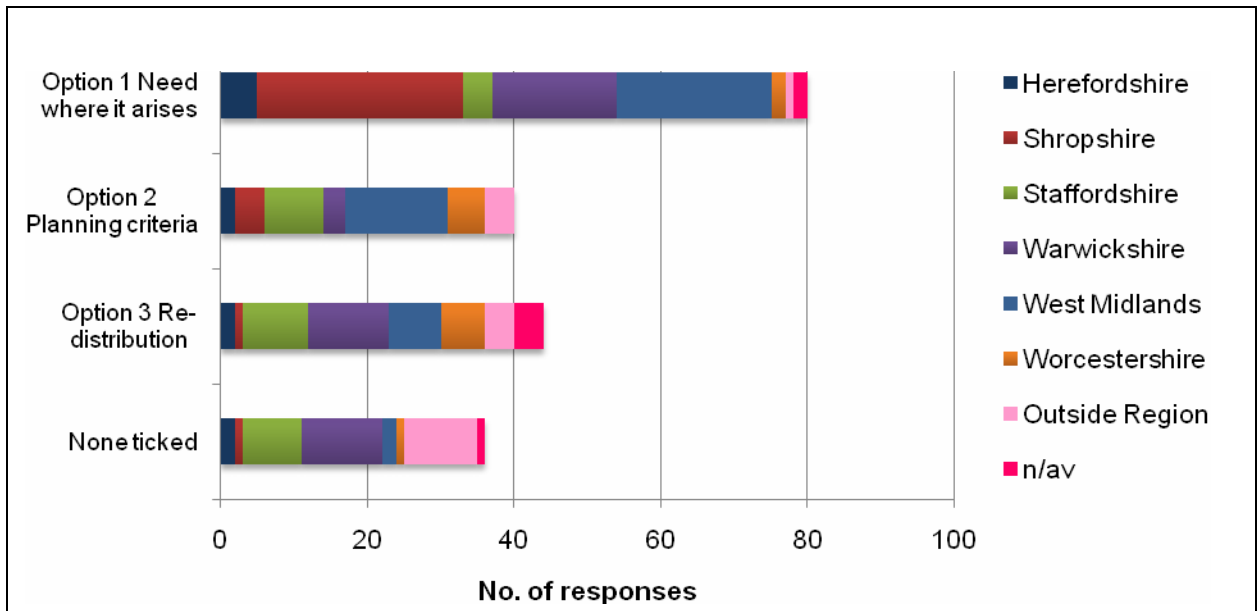
- The three options do little to address the current imbalances and they seem to perpetuate the current patterns of provision resulting in increased numbers in areas which already have substantial provision or a concentration of G&T populations.
- The options do not sufficiently take into account needs to protect the green belt.
- The evidence base is flawed and therefore there should be an option with a lower overall total. Staffordshire County Council, District Councils and numerous individuals argue that the variations in levels of provision between different options across Staffordshire and Worcestershire are so marginal as not to represent meaningful options at all.
- The 3 options should not be mutually exclusive. Elements of each should be included in the final choice. Birmingham City, for instance, supports all three approaches.
- Many individual responses argue for a greater redistribution option, eg. “no reason is given for arbitrarily choosing 25%” (South Worcestershire Authorities); “We believe that there may be an option 2a. Instead of a 75% where the need arises and 25% area allocation, there could be a 50:50 allocation” (Rooftops Housing Association). A particularly well organised response from Wolvey, Shilton and Bishopstone Parish Council areas argues that the options are insufficient and that a 100% redistribution of existing need should be considered. This view was submitted by a public meeting in Wolvey Parish and more than 20 individuals. A new option is also proposed by Cannock Cannock Chase Council.

A common view is that all options should focus more on the type of site to be developed – with encouragement of more private/family owned, smaller sites (less than the 14 minimum pitches suggested) where G&T communities can find affordable land that suits them and develop sites within the planning system. It is suggested that this would ensure sites are where the G&T community will use them and will reduce resentment and avoid conflict with rural parish communities. Many G&T individual respondents and several parish and district councils highlight the risks of over-expanding public sites which can result in conflict with the G&T community and tensions with adjacent communities.

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

	Number	Percentage
Option 1 – Need where it arises	66	36%
Option 2 – Planning criteria	43	23%
Option 3 – Re-distribution	45	24%
No option ticked but comments made	34	18%

Note: 4 responses ticked more than one option.



184 responses were received, with Option 1 preferred by over a third of respondents because of strong support from individuals (particularly within G&T communities and those who work with them) with equal support (23%-24%) for Options 2 and 3. A substantial minority (18%) were unable to choose between the options.

- Option 1 'Need where it arises'** was favoured by 34.4% of respondees particularly by individual G&T respondents because they see it most closely reflecting current needs. Amongst this group there is a strongly expressed preference to have more provision where people are currently settled - or where under provision has been identified - so that families and clans do not have to be split up. Many respondents identified a problem of children marrying at 17-18 years old and then having to move away or into 'bricks and mortar'. A number of respondents stress the need to look at family size and growth and travelling patterns to ensure that numbers really reflect future needs. Option 1 is also supported by those local authorities least affected by differences in numbers across the different options. However, a number of respondents highlight that this option would tend to concentrate provision on specific local authorities such as Rugby, Wychavon and Wyre Forest and perhaps even excessively on particular locations.

Birmingham City Council identifies this option as the best way to fulfil the intentions of circular 01/2006, to reduce the number of unauthorised encampments (para 12b) by providing pitches where need arises. However, others identify the need for some redistribution from traditional areas to those areas which have been slow to provide in the past (West Midlands Rural Affairs Forum) and identify the ability of those who have not provided any pitches and would not be required to do so as a major limitation to Option 1. Option 1 is opposed by some individuals who question the overall basis for the GTAA and are opposed to Gypsy and Traveller lifestyles.

- Option 2 'Planning Criteria'** was supported as most likely to achieve a more equitable distribution and provision of pitch requirements within the context of a 'plan, monitor and manage' approach. It is variously reported as being more 'bottom up', feasible and a better compromise. The approach is supported by organisations most concerned about development in the Green Belt and many consultees highlighted that the criteria for allocating land and assessing development should be the same as for all other types of development, ie based on high levels of sustainability, in particular social and physical integration with existing and planned communities within the life of the plan period and respecting Green Belt restrictions. However, concerns were expressed by English Heritage that not all Green Belt constraints have been fully included under the relevant Environment questions.

Multiple respondents (more than 20 in total) from Wolvey Parish and Shilton Parish Council - whilst not necessarily agreeing to any option because they do not go far enough in redistributing existing sites across the region – worded their arguments as follows '*Option 2, provides a*

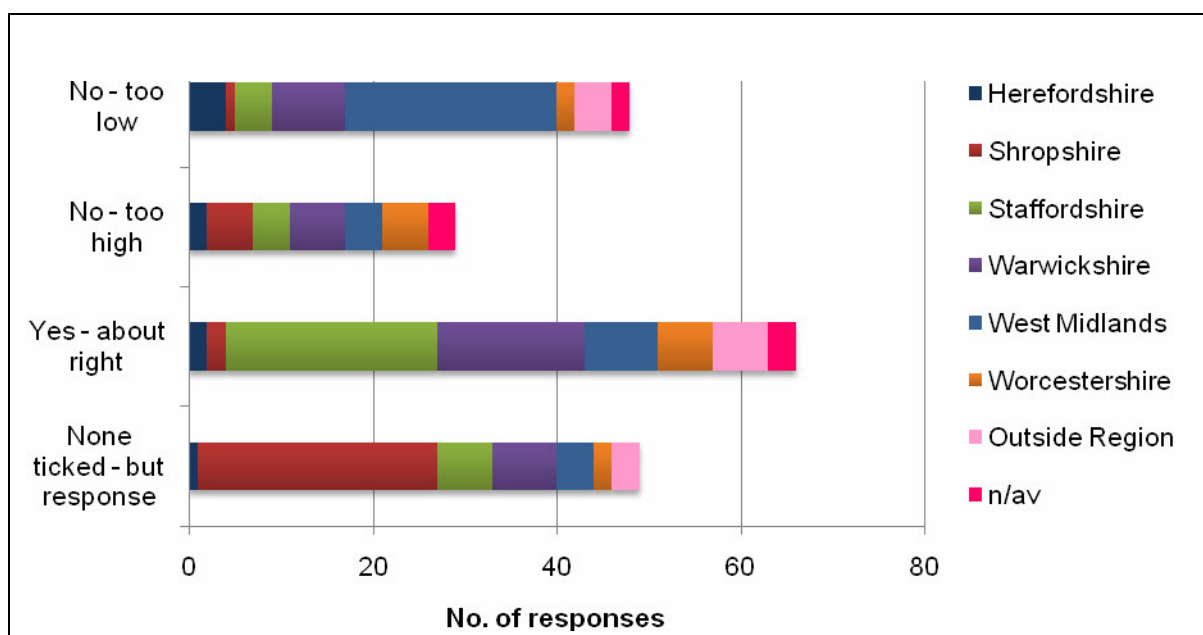
balance between meeting the accommodation needs of Gypsies and Travellers and avoiding over intensive allocation of pitches in any one authority. However the planning criteria for option 2 should be amended to reflect actual availability of land for development and should not take account of land that is significantly constrained by existing planning policy or other physical constraints. In particular, land designated as Green Belt should not be considered for any residential development. A greater focus should be given to identifying brownfield sites in urban areas to improve access to education and employment. This approach would be consistent with that of RSS Phase II for identifying land for bricks and mortar housing development’.

- **Option 3 ‘Redistribution’** of existing sites was widely supported by those who consider that their areas are already over provided for (see GTQ2 above) and who fear that the ‘need where it arises’ approach will lead to greater numbers and perpetuate ‘existing unfair burdens’. The main arguments cited in support of Option 3 are that it appears to provide the most equitable dispersal of pitches across the region and distributes the costs most fairly, without placing further burden on small rural parishes.

A number of G&T individuals and organisations working with them also support this option as most likely to give gypsies and travellers a wider choice in areas that have not previously been accessible to them and as most likely to prevent ‘institutional discrimination by certain local planning authorities’. These respondents stress that existing patterns are often not due to lack of demand but rather to intolerance and lack of provision by local authorities in the past. One respondent suggests that these districts have failed to comply with the 1968 Caravan Sites Act and point out that saying that they should not have to provide any more pitches because they already have Traveller sites in their area. Option 3 is also seen as giving greater provision in the West Midlands conurbation where the community will have better access to employment opportunities and facilities such as health, education and transport services. However, those G&T individuals who favour Option 1 also express concerns that Option 3 may ‘put pitches in places where people do not want to live’.

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?

	Number	%
Yes (about right)	66	39%
No – too low	48	28%
No – too high	29	17%
No option ticked but written response given	29	17%
Total	172	100%



Of the total 172 responses, the largest proportion (39%) feels that the proposed 244 pitches – when distributed across the region – will be ‘about right’. Several respondents highlighted that the numbers should be reviewed on a timely basis and considered a minimum level of provision rather than an upper limit. Many respondents supportive of the overall numbers noted that need has been assessed solely on the basis of GTAA but that they have no reason to question the numbers.

28% of respondents – almost all from the Gypsy and Traveller community – felt that the number proposed was too low on the basis of their own family and friends’ experiences and aspirations to travel around the area and visit family. They also argued for higher numbers in order to reduce the number of ‘unauthorised’ sites currently operating across the region.

17% of respondents feel the numbers are too high. There is a considerable overlap with those organisations and individuals responding that GTQ1 figures are too high. The main reason given for disagreement is the robustness of the GTAA and whether the resulting figures are inflated. Many responses were received from across Staffordshire and parishes (see GTQ2) which already have provision of traveller sites. South Worcestershire authorities dispute the need for the transit sites identified in the GTAA for Worcestershire and highlight the risk that if there is over-provision sites will become permanent. These authorities, however, emphasise the need for temporary stopping places - consisting of an area of hard-standing and available water – for certain periods of the year when the travelling community is on the move to fairs and gatherings. A sizeable minority of individuals from Gypsy and Traveller communities also expressed the opinion that fewer travelling sites should be developed – particularly if they are at the expense of additional permanent pitches – and that those that are developed should be well run by local authorities and not too large or adjacent to permanent sites, as this is seen as causing trouble and conflict with existing settled communities.

A substantial minority of those responding (17%) felt unable to comment on the basis of the available evidence.

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?

	Number	Percentage
Yes	43	35%
No	64	52%
Not sure (no response but comments submitted)	17	14%
Total	124	100%

Of the total 124 responses, 35% agree that the geographical provision will meet G&T accommodation needs, while the majority (52%) did not. The main reasons cited for considering that the geographic provision would not meet G&T accommodation needs are that:

- The geographical spread should be more even across the region. This would enable provision that is more socially sustainable and provides more choice for the Gypsy and Traveller community.
- More provision is needed in metropolitan and urban areas – particularly around Birmingham – to meet needs for employment, facilities and services.
- Some areas will be overprovided for (Shropshire, Worcestershire and Herefordshire)
- Giving some authorities a nil allocation removes any incentive for them to contribute to further provision.
- There need to be more smaller, family sites and a better mix of ownership with gypsy owned sites encouraged through the proper planning channels.

Again a sizeable minority (14%) were unsure based on concerns about the GTAA and the overall context of need.

Question GTQ7: Do you think the draft Policy for Transit provision should be strengthened?

	Number	Percentage
Yes	39	46%
No	41	49%
Not sure (no response but comments submitted)	4	5%
Total	84	100%

Of the 84 responses to this question 46% considered that the policy should be strengthened and 48% that it did not require further strengthening. A further 5% were unsure but submitted comments.

Amongst those that feel the policy does not require strengthening reasoning is that the policy is strong enough as it seeks to ensure that local authorities identify suitable sites, supports cross-boundary working and encourages those local authorities with no identified need for sites to contribute. However, clearer definitions (eg of transit pitches) would be helpful.

The emphasis on joint working is welcomed by a number of Local Authority respondents. Amongst those wanting the policy strengthened there is support for further resources for local authorities to work together for future transit provision. One respondent suggested the Strategy could include proposals to develop exemplar schemes showing how transit provision can be funded and managed jointly by authorities, potentially through jointly commissioning the service to develop and manage a site. Another suggested joined-up planning will require support of the Regional Assembly and mechanisms and support for joint funding application should be put in place.

Those considering that the policy does not need strengthening mainly felt that it is strong enough already.

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?

	Number	Percentage
Yes	42	65%
No	12	18%
No option ticked but comments made	11	17%
Total	65	100%

Of the 65 responses to this question, the majority (65%) agreed that the provision of 118 plots for Travelling Showpeople will meet their accommodation needs. A small minority (18%) did not agree based on a range of views including:

- A perception that the number of pitches is too small;
- A feeling that there is no robust evidence base for providing any additional pitches (largely echoing responses to GTQ1 and GTQ3).

Again a number of respondents questioned the validity of the GTAA as a basis for predicting needs. A further 17% neither agreed nor disagreed, with the major explanation being that they did not feel the evidence gave them the basis for commenting on needs.

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?

	Number	Percentage
Option 1 Need where it arises	38	54%
Option 2 Re-distribution	15	21%
No option selected but comment submitted	18	25%
Total	71	100%

There were a total of 71 responses on the proposed options for distribution of additional plots split as follows:

- Option 1 (providing the need where it arises) is favoured by the majority (54% of responses). Views tend to echo preferences in relation to permanent and transit gypsy and traveller pitches. The principles underpinning Option 1 are supported by Metropolitan Authorities as it provides for need where it arises and meets preferences amongst Travelling Show people community. In the Black Country, in particular, the Travelling Show people community has expressed a desire via the GTAA to remain in the locality and this is supported by the local authorities. The Showman’s guild supports Option 1 because it is perceived as delivering *‘more urban sites and being more in keeping with what members already have’*. Many other local authorities support Option 1 because it is generated from GTAAs which involve liaison with travellers (*‘people wish to continue to reside in areas where they currently live, e.g. conurbation and adjacent areas’*). The focus on larger conurbations is seen as appropriate by many as *‘this is where the market place for the Travelling showpeople is’*.
- Option 2 (redistributing plots) was favoured by 21% of respondees. This included a number of G&T respondees who consider it will allow a wider geographical choice, with opportunities to legally reside where they want to – in counties outside the major conurbation – not just where they have historically located because sites are available. This option is also cited as a ‘fairer’ distribution by some smaller Local Authorities tending to echo their preferences for redistribution of permanent and transit gypsy and traveller plots (GTQ1 and GTQ3).
- 18 respondents (25%) did not select an option, as for TSQ1 above, mainly because they felt there was no evidence base available on which to make an informed decision. In the case of Stoke, Swindon Parish Council and Staffordshire (7 comments) respondees highlighted that the two options generate the same numbers and so they had no preference between them.

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?

	Number	Percentage
Allocated on County Basis	46	60%
Allocated on a district basis	15	19%
No preference, but comments made	16	21%
Total	77	100%

Of the 77 responses to this question a county basis for distribution is the preferred mechanism (59% of respondents).

- County Basis. The reasons for supporting this option include concerns that the GTAA is not sufficiently robust to allocate need on a district basis, that a county basis for allocation will give greater flexibility in meeting gypsy and traveller needs and finding unconstrained sites, and that it better reflects sub-regional planning processes and is likely to lead to more equitable allocation across Districts. Proponents also argue it will promote joint working and lead to efficiency gains (eg with only one officer dealing with issues). Supporters of this option include most of the County Councils, wider planning interests and many larger unitaries. Some concerns were, however, expressed that some Districts which have not made provisions in the past may be able to continue not to do so.
- 19% of respondees favour Option 2 (allocation on a District basis). Arguments to support District level allocation include the likelihood that local needs (of both gypsies and travellers and small rural communities) will be better understood at district level and concerns that only Districts can actually identify and deliver sites.
- Amongst the 21% of respondees with no clear preference, concerns were expressed again about the basis for the GTAA figures and concerns that the County Councils have no planning responsibility in this area and accordingly have no means of ensuring implementation.

FROM TRAVELLING SHOWPEOPLE QUESTIONNAIRE Where in the West Midlands Region do you currently reside?

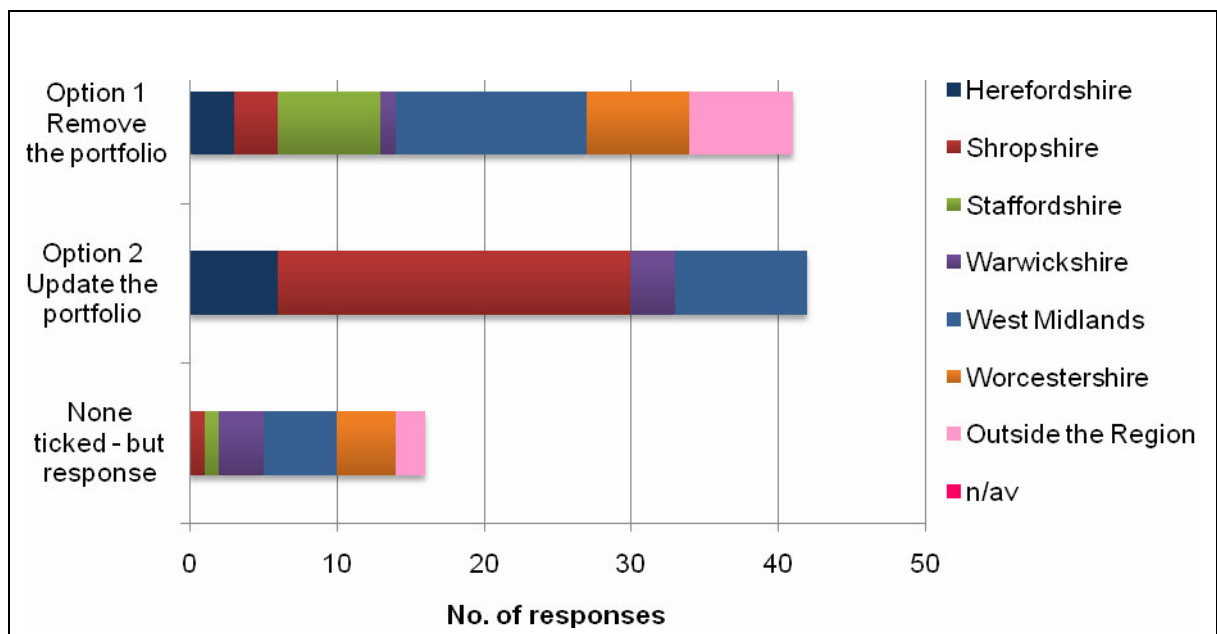
No responses to this question were received specifically from Travelling and Showpeople.

Overview of Culture Sport and Tourism:

- **Portfolio of Assets (CST1)** - Mix of views on whether a portfolio of assets should be included in Policy 10A and whether the list of assets should be removed. Concerns that the list would not be comprehensive and that it would date; and many would prefer having an indicative list across generic themes.
- **Protecting Assets (CST2)** - Majority (77%) agree that Policy PA10A should “protect”, as well as improve existing strategic cultural assets and that generic protection criteria could be included for LDFs to draw upon.
- **Gaps in strategic culture, sport and tourism assets (CST3)**. Support (68%) for developing a new policy to address strategic gaps and increase the emphasis on social benefits. Concerns over BOP report – missing important assets and themes, such as natural environment assets and waterways.
- **Addressing poor quality and access to culture, sport and tourism assets** – suggestions included: the importance of transport infrastructure; access to greenspace and parks; encouraging new facilities to be in accessible locations; need for local assessment of demand to identify gaps to fill.

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?

Organisations:	Option 1- Remove the portfolio	%	Option 2- Update portfolio to include all regionally significant assets	%	No option ticked but response	%	Total
LA - County or Unitary	10	7%	5	4%	1	1%	16
LA - District	3	2%	15	11%	2	1%	20
Parish Council	4	3%	16	11%	3	2%	22
NDGB	5	4%	4	3%	1	1%	10
SEEP	17	12%	25	18%	5	4%	47
Business	1	1%	7	5%	1	1%	9
Individual	1	1%	11	8%	3	2%	14
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	41	30%	83	59%	16	11%	140



There was a mix of views as to whether the portfolio should be removed or retained in an updated version with 59% favouring Option 2 to update the portfolio to include all regionally significant assets.

Arguments for Option 1 removal of the portfolio (selected by 10 of the 15 Unitary and County Authorities) are that the list would become increasingly out of date over the period of the RSS and that it is already incomplete, inconsistent and, by its nature, cannot be comprehensive. Alternatively, an illustrative list of assets across generic themes could be used, which would be more dynamic and responsive to changing circumstances.

Those in favour of Option 2 supported the idea of retaining a list to help protect existing assets, but many also felt that an indicative list across generic themes might be the best approach.

Option 1 - Remove the portfolio:

- The Council does not see the value of retaining the portfolio as contained within the existing policy, as given the length of time covered by the RSS, it would be out of date before it can be updated. Furthermore it would therefore fail to be 'futureproof' as new assets are likely to be developed over the RSS period which could be as valuable to the region as existing assets. Subsequently it is considered that option 1 to remove the portfolio is the most appropriate. (East Staffordshire Borough Council)
- It is recognised that the portfolio of assets in Part A of Policy PA10 is incomplete, inconsistent and out of date. However, a replacement more detailed portfolio would be subject to similar limitations as preferences and needs change over time. Moreover, identifying assets would require a degree of subjectivity which inevitably would be very difficult to agree with all stakeholders. An updated generic list of assets set out in the policy might be an alternative and this could be based on visitor numbers, where they are available. Alternatively, an illustrative list of assets could be highlighted in supporting text, which would be more dynamic and responsive to changing circumstances. (WM Planning & Transportation Sub-Committee)
- Such a list needs to be comprehensive and kept up to date, plus include relevant green infrastructure with effective cross referencing to QoE Chapter. The list seems inconsistent at present and we support the arguments put forward by Natural England and English Heritage regarding its removal. (Forestry Commission).
- The portfolio is inconsistent and, by its nature, cannot be exhaustive. This leads us to conclude that the portfolio cannot add value... Another option rather than try to list each individual asset would be to identify generic 'themes' relating to cultural provision, such as theatres/places of worship. (Worcestershire County Council)
- AWM considers that removing the 'portfolio' is the most appropriate option for updating Policy PA10. There is a danger that the policy could become outdated, as per the current policy if the portfolio is simply updated. Supply side information is a snap-shot in time and will evolve over the course of high level strategic planning document - policy wording should provide for this flexibility. (AWM)

Option 2 - Update portfolio to include all regionally significant assets:

- With regard to PA10A, it is considered important that the RSS should give strategic support for key regional tourism and cultural assets in order to guide decisions and investment. Support is therefore expressed for option 2 with the caveat that it should be a comprehensive portfolio of international, national and regional assets. (Staffordshire Moorlands District Council)
- We agree that updating the portfolio will protect and improve what is already in place and will assist with future investment. However, we are concerned that the methodology for assessing Heritage and Leisure and Tourism as used within the BOP report based upon visitor numbers is fundamentally flawed... The West Midlands Tourism Officer Group suggested a preferred option for a portfolio list of themes with specific assets referenced. This would help to distinguish the commercial sector from heritage sites e.g. listed buildings and commercially run castles such as Warwick Castle. (Warwickshire County Council)
- A number of responses questioned whether Birmingham International Airport should be included, arguing that it is a mode of travel or gateway rather than an actual destination.

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	12	10%	2	2%	0	0%	14
LA – District	12	10%	3	2%	1	1%	16
Parish Council	19	15%	1	1%	1	1%	21
NDGB	6	5%	2	2%	0	0%	8
SEEP	32	26%	12	10%	3	2%	47
Business	3	2%	2	2%	0	0%	5
Individual	11	9%	2	2%	0	0%	13
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	95	77%	24	19%	5	4%	124

Strong support for the general principle of Policy PA10A to “protect” as well as improve existing strategic cultural assets from development.

However, respondees identified the need for clarity in the meaning of ‘protect’ – eg. it is “important that protection does not limit the development of the assets that would promote further economic and community benefits, and that the policy does not seek to protect assets that become unviable”.

Some respondents, particularly amongst local authorities, agreed with the principle of protecting assets, but considered that this should be addressed by the RSS setting out generic protection criteria and individual Local Development Frameworks (LDFs) drawing on these to identify assets which take into consideration the diversity of individual sub-regions.

Others stated that cultural assets already benefit from 'protection' through existing mechanisms such as historic building listings; and that a more useful approach for the RSS would be to ensure *better management* of assets - "improvement" rather than "protection" as this would imply positive and dynamic management, rather than just maintaining the status quo.

YES:

- Would need to clearly identify what ‘protect’ means. The RSS should seek to ensure that assets continue to provide a wider economic value and contribute to the attractiveness of the region. In this respect they should be protected. However, it is vital to ensure that protection does not limit the development of the assets that would promote further economic benefits. Equally the policy must also ensure that assets that potentially become unviable are not protected. (Shropshire Council)
- We agree that the policy should also look to protect and enhance existing assets. However, I consider that this should be addressed through individual LDF's. To suggest generic protection criteria within the Spatial Strategy would not take into consideration the diversity of each individual sub-region. (Warwickshire County Council)
- Cannock Chase Council agrees overall that in principle key assets should be protected. However, the policy should be flexible enough to allow for exceptions to be made and that in some cases that appropriate and limited development could be allowed (for example a visitor centre in an AONB) and that protection should not be at all costs: for example where a particular asset becomes unviable and unsustainable during the plan period. (Cannock Chase District Council)
- Yes with qualifications. TCPA believes that existing assets, in particular heritage ones, need to be protected in physical terms to prevent the diminishing of the building’s or site’s character. ... The Policy should not place any unnecessary restrictions on proposals to physically improve the asset in order to improve usage and capacity. The balance between conservation and functionality should be struck but detailed policies are more appropriate through the LDF and further supplementary guidance from the LPA. (Town & Country Planning Association)

NO:

- Cultural assets already benefit from 'protection' through existing mechanisms such as the listing of historic buildings. In the case of historic environment assets, account will need to be taken of the emerging historic environment PPS. A more useful approach for the RSS to adopt would be to ensure better management of assets. We would favour "improvement" to our assets rather than "protection" and "development" as it implies positive and dynamic management, rather than maintaining the status quo, or engaging in rash action. (Worcestershire County Council)
- It is unclear how 'protection' would operate in conjunction with other legislation and policy. In the case of the natural and historic environment the system of protection is well-established and understood, and we would not wish to see this complicated unnecessarily. We suggest that the emphasis should be more on the sustainable management of existing assets. (English Heritage)
- It is not altogether clear that "protection" would be an appropriate planning policy approach to the wholly commercial end of the range of assets addressed by policy PA10A (with or without the portfolio). Many cultural assets are protected by other planning policies. We are concerned about those assets whose intrinsic cultural value is not protected by designation but consider that this would better be addressed by ensuring that they are protected by policies that focus on those attributes rather than seeking to extend blanket protection under policy PA10A. (National Trust)
- National Planning Policy framework should be sufficient here. The approach to protect as well as improve may be appropriate for natural and heritage based assets, but the numerous commercial assets will be determined by market viability and this would perhaps be beyond the scope of planning? (Wyre Forest District Council)

NO TICK, BUT WRITTEN RESPONSE:

- Emphasis should be placed on developing existing assets, reflecting their importance to regional and local economies and encouraging complementary new facilities in line with market demand. While not seeking to hinder appropriate new and complementary development, it is important that the key existing tourism, culture and sporting assets are given due regard in the planning and development process. It is of concern, if a new policy dilutes the clear emphasis on facilitating economic growth. The RSS needs a clear understanding of the key characteristics of the sector, spatial distribution of key strategic assets and visitor demand/activity patterns. AWM considers that there is not a case to protect all existing assets within a re-drafted policy. Many of the key strategic assets across the sector will already be protected through their own designations – AONBs, National Nature Reserves, Listed buildings etc. Regional spatial policy should recognise the importance of key sector assets - particularly where these have clear strategic land use and economic implications, ensuring that they are given appropriate weight in aiding the preparation of local development frameworks and local planning policy. (AWM)

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?

Organisations:	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	%	No option ticked but response	%	Total
LA - County or Un.	5	4%	3	2%	7	5%	1	1%	16
LA - District	0	0%	5	4%	15	12%	2	2%	22
Parish Council	3	2%	3	2%	13	10%	0	0%	19
NDGB	0	0%	2	2%	6	5%	1	1%	9
SEEP	1	1%	8	6%	35	27%	2	2%	46
Business	2	2%	1	1%	2	2%	0	0%	5
Individual	0	0%	2	2%	11	8%	0	0%	13
Individual - G&T	0	0%	0	0%	0	0%	0	0%	0
TOTAL	11	8%	24	18%	89	68%	6	5%	130

Strong support amongst respondents (68%) for Option 3 to develop a new policy in addition to PA10. Many respondents agreed with the need for a new policy that places more emphasis on the social benefits of culture, leisure and sport, as well as economic benefits; and on the importance of more local facilities and access to community sports facilities to support participation. The policy should aim not only attract people into the region to experience the assets on offer, but also aim to tackle the lack of participation in the region in respect of sport.

New criteria identified by respondents include: the impact on and contribution to the environment, local accessibility of green space and green infrastructure, and social criteria such as the health and well-being and contribution to quality of life.

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

- If the RSS is to provide the necessary strategic guidance for the needs of culture, sport and tourism assets then developing a new policy is the most appropriate option. It is important that the tourism sector retains a clear economic focus, while acknowledging social and environmental benefits. (AWM)
- Consideration could be given to a new policy that places more emphasis on the social benefits of culture, leisure and sport, as well as the economic benefits; and on the importance of more local facilities. This could address issues such as the health and well-being of people, and the value of local accessible green space and other green infrastructure. (Natural England)
- New criteria should include assessment of the impact on and contribution to the environment, as well as social criteria, to make any assessment truly sustainable. The policy should not, however, identify specific proposals. (National Trust)
- The focus of the policy should be just wider than economic development and should aim not only to 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. (Bromsgrove DC)
- the establishment of updated or additional criterion is only appropriate where there are 'gaps' in the existing policy framework or there is a need to apply existing policies differently (perhaps more flexibly) in order to consider proposals for adaption of existing assets or to address gaps in the Region's portfolio of assets. (Malvern Hills DC, Worcester CC and Wychavon DC).
- PA10 must reflect the local social and community benefits as well as the economic impacts. This could be emphasised through additional policy criteria. There remains a question on whether the policy needs to reference how this should be addressed through the level of LDF, rather than the RSS. (Shropshire Council).
- The new policy needs to consider not just economic factors but also the social impact and the importance of quality of life. In principle we support proposals for locational criteria. These should not only support the regeneration strategy of the RSS but should also seek to maximise accessibility and where appropriate complement the strategy to support the region's centres as set out in RSS policies UR1, UR3, UR4, PA11, PA12, PA12A and PA12B. The Best Practice Guide for Tourism – which replaced PPG21, would be a useful start for developing a policy specifically for tourism. (Walsall Council) .
- The remit of culture is not solely economic/tourism based. There is a need to consider the social impacts and the value of culture to the quality of life. The need for localised cultural infrastructure in support of participation and civic engagement agendas should be addressed. (Birmingham City Council)
- Option 3 would have the benefit of linking with other economic and social initiatives, such as local regeneration and growth programmes, as well as providing opportunities for use of infrastructure levy funding. (Warwick DC)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	9	9%	5	5%	1	1%	15
LA - District	10	10%	4	4%	2	2%	16
Parish Council	14	13%	3	3%	1	1%	18
NDGB	1	1%	1	1%	3	3%	5
SEEP	8	8%	24	23%	5	5%	37
Business	2	2%	3	3%	0	0%	5
Individual	6	6%	3	3%	0	0%	9
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	50	48%	43	41%	12	11%	105

There is no clear agreement amongst respondees on the strategic gaps identified in the BOP report, but widespread concerns that the BOP report is significantly flawed, resulting in the list being inaccurate and misrepresentative of the region's most significant cultural assets.

Strategic gaps identified by respondees include:

- tourism accommodation
- green tourism
- natural environment assets
- more emphasis on heritage assets (eg. historic parks, gardens and historic designed landscapes)
- Public Rights of Way Network
- Inland waterways network
- major sporting events.

- the [BOP] report is flawed in many areas and as such is not a reliable source for determining strategic gaps or for developing new policies relating to Culture, Sport and Tourism. Further research is required into levels participation, or lack thereof, differences in demand at the various levels – national, regional, sub-regional and local. Only when this work is complete will we have a greater understanding as to what the strategic gaps are....In addition, the region must consider how residents benefit or use cultural facilities in other regions and therefore whether 'gaps' are real. (West Midlands Tourism Development Officers Group).
- The facilities identified are predominantly focused at the highest level of provision and an international 'offer'. This contrasts with the desired aims of giving greater prominence to social drivers for culture and sports provision and the importance of local facilities to increasing participation. (English Heritage).
- The principle behind identifying a hierarchy of international, national and regional assets is valid, and if delivered to criteria which key regional partners are able to sign up to, would be useful to inform the development of RSS policy. The BOP research only looked at supply-side information - this on its own is insufficient to identify strategic gaps. Demand-side intelligence is required to draw more accurate conclusions on potential gaps. (AWM).

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	10	9%	0	0%	5	5%	15
LA - District	14	13%	1	1%	0	0%	15
Parish Council	16	15%	2	2%	1	1%	18
NDGB	7	6%	1	1%	0	0%	8
SEEP	25	23%	7	6%	6	6%	38
Business	1	1%	2	2%	0	0%	3
Individual	8	7%	2	2%	1	1%	11
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	81	74%	15	14%	13	12%	109

74% of respondents (including 24 out of 25 Local Authority respondees) agreed that the options could help to address poor quality and access issues in relation to culture, sport and tourism assets.

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)

Responses included that:

- The new Planning Policy Statement on planning and the historic environment has been published and emphasises the importance of identifying what is significant about an asset to enable conservation. This will encourage a proportionate response to change as there will be an awareness of the extent to which development can be accommodated. The historic environment should be considered an asset to place-making rather than an obstacle to development
- It needs to be recognised within the policy that transport is key to the success of the sector and that more detailed policies are needed on public transport provision based upon visitors.
- The emphasis should not be just on a few larger facilities – the policy should also aim to meet the needs of everyone by protecting and supporting the larger numbers of smaller facilities and cultural assets. As such, the portfolio of assets should be removed since this would serve to focus resources and attention on specific assets.
- Regional guidance is needed to identify new assets. Issues relating to access and management of assets needs to be addressed at sub-regional level through LDF's.
- Realism is needed on the extent to which regional spatial planning policies can increase the quality of assets or address the social issues preventing increased participation.
- To purely follow a mapping approach to identifying potential locations/ facilities of culture, sport and tourism would not be appropriate without assessing need and demand across the whole region. It may be best for the Policy to require a more proactive cultural planning process at the sub-regional and local levels which follow the spatial and infrastructure planning process set out in the new PPS12.
- There is a need to include references to additional assets such as inland waterways, geodiversity and natural environment assets, public rights of way etc.

5 QUALITY OF THE ENVIRONMENT

5.1 OVERVIEW

- **QE2 to QE9:** Significant degree of support for the issues covered in policies QE2 to QE9 and in the text on air quality and agricultural land. A limited number of suggestions were made in each case for additional issues to include or issues to exclude.
- A common response which occurred throughout the section was to question the value of policy at regional level, either because of repeating national policy or because the issue is best left to local level.
- **Integrated Approach to Environment Resources (QE1):** no clear preference, but generally more support for Environment Led (Option 1) and Spatial Strategy (Option 3) approaches.
- **Renewable Energy:** Strong agreement on the need to revise EN1 on renewable energy. But lack of agreement on the basis for renewable energy targets – adopt national policy (32%), sub-regional targets (44%). Local Authorities did not support the option of setting regional targets for specific renewable technologies. Support (64%) for a criteria based approach for assessing renewables planning applications.
- **Positive uses of Green Belt:** Responses were split between establishing a regional policy to support positive uses of Green Belt and applying national policy PPG2.

5.2 QE2 RESTORING DEGRADED AREAS AND MANAGING AND CREATING HIGH QUALITY ENVIRONMENTS

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	12	10%	3	2%	1	1%	16
LA - District	10	8%	3	2%	3	2%	16
Parish Council	19	15%	3	2%	0	0%	22
NDGB	8	6%	0	0%	1	1%	9
SEEP	37	29%	3	2%	2	2%	42
Business	5	4%	0	0%	2	2%	7
Individual	9	7%	3	2%	2	2%	14
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	100	79%	15	12%	11	9%	126

Fourth fifths of those responding supported the list of issues for policy QE2. A number of views were given on particular issues which should not be included, in particular (d) on the West Midlands Brownfield Land Working Group and (f) on the regional Centre of Excellence.

- Care should be taken with (d) as not all brownfield land should be developed. (Hereford & Worcester Gardens Trust)
- (d) It is inappropriate for a plan intended to last for 20 years to refer to a working group that may operate for just a few years. (Hagley Parish Council)
- Not 'f' - costs would outweigh the benefits. (Worcester Civic Society)
- (f) would be best placed in the supporting text. It is too specific for inclusion in the policy. (Worcestershire County Council)

A range of suggestions were given for additional issues to include, with a number of themes emerging, including:

- Include importance for geodiversity

- Should address issue of development viability
- Move towards a criteria-based approach to the reuse of brownfield sites.
- Recognise positive benefits for mining legacy which is a regional issue.
- Encourage planning for green infrastructure
- Emphasise multi-functional benefits

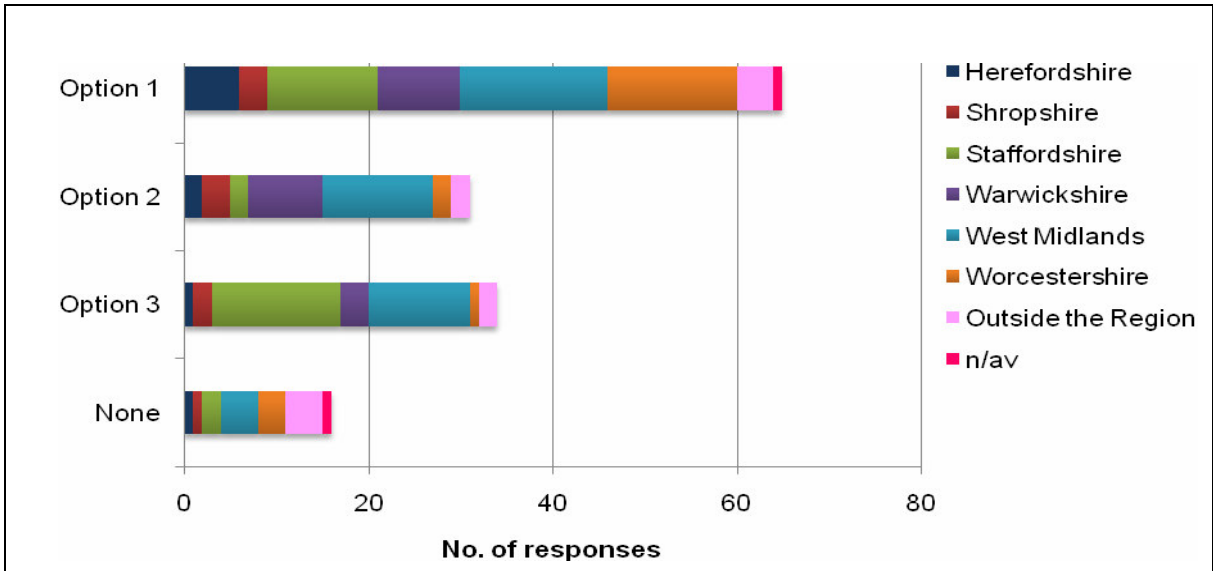
Examples of other comments:

- Develop mechanisms by which rural brownfield sites can be decontaminated (where necessary), so that they can revert to agriculture. Such land should remain undeveloped, but, not normally, unused. (Hagley Parish Council)
- (b) has to be balanced with (d) and there may be a need for more guidance on when development should not be allowed on brownfield land. (CPRE)
- The existing RSS policy should be retained, as the proposed list of issues is too heavily focused on brownfield land, and failing to ignore wider issues, whereas the existing policy refers more widely to 'the natural, built and historic environment' in terms of environmental quality and regeneration in both rural and urban areas. Policy within the RSS is needed to address more than just the concerns of regenerating the MUA, which the revised policy appears to suggest. (East Staffordshire Borough Council).
- We would like to see woodland creation specifically included in Policy QE2 as a key element of environmental regeneration. (Woodland Trust)
- The value of existing gardens and mature grounds - often categorised as 'brownfield' - as components of green infrastructure should be recognised. (Natural England)
- Issue (b) includes 'brownfield land habitats'. It should be noted that there is now a recognised Biodiversity Action Plan habitat type that applies to some of this land (Natural England).
- QE2 should also recognise the positive aspects that developing previously developed sites can bring in terms of addressing ground stability issues and tackling mining legacy. This issue is a regionally specific issue to the West Midlands (The Coal Authority).
- It would be difficult for this policy to be effectively implemented without compromising the urban renaissance objectives of the RSS, in terms of intensification of MUA housing provision and economic development or providing a high quality of environment, in terms of developing and maintaining urban green infrastructure for enjoyment as well as functional roles such as flood risk management. (Town and Country Planning Association).

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

Organisations:	Option 1 – Needs Led	%	Option 2 – Growth led	%	Option 3- Competitiveness Led	%	No option ticked but response	Total responses
LA - County or Un.	10	7%	6	4%	3	2%	3	22
LA - District	7	5%	6	4%	11	8%	3	27
Parish Council	15	10%	4	3%	4	3%	2	25
NDGB	6	4%	1	1%	3	2%	0	10
SEEP	22	15%	9	6%	5	3%	6	42
Business	2	1%	0	0%	2	1%	1	5
Individual	4	3%	5	3%	5	3%	1	15
Individual - G&T	0	0%	0	0%	0	0%	0	0
TOTAL	66	45%	31	21%	33	23%	16	146 (note 1)

Note 1: some ticked more than one option.



Most support was given for Option 1, a needs led approach, with less support for Options 2 and 3, growth-led and competitiveness-led. 10% of respondents thought a combination of options was required.

Option 1:

- Appears to best incorporate consideration of the social and environmental value of some brownfield land (Staffordshire County Council)
- should lead to the greatest improvements in the environment, in the areas most in need of it. (RSPB)
- A needs led approach should be more equitable, and bring resources into otherwise deprived areas (Globally Local LLP)

Option 2:

- Focused activity in growth points to ensure maximum usage of brownfield sites. (Hereford & Worcester Chamber of Commerce)
- A ‘Growth Led’ approach allows for much greater flexibility to determine the type of regeneration at a local level. Neither does a ‘Growth Led’ option preclude the conservation and enhancement of biodiversity and green space. (Herefordshire Council)

Option 3:

- This has best fit with the principles of the RSS but should support improvements to degraded land on the ‘urban fringes’ of the Major Urban Areas where opportunities could exist to enable better access to the countryside through an enhanced network of footpaths, cycleways and wildlife corridors. (South Staffs Council)
- Option 3 is supported, with the caveat that the areas priority should be also be directed towards Settlements of Significant Developments. (Nuneaton and Bedworth Borough Council)

Other comments:

- It is important that the final version of the policy provides guidance and encouragement throughout the whole region. In this regard it is noted that the current policy QE2 does not prioritise. (Worcestershire County Council)
- We do not believe that one option can be chosen over another. All the options could be appropriate in certain circumstances. (Bromsgrove District Council)
- Should not be limited to areas in and around MUAs and regeneration zones only, but should be widened to cover locally identified regeneration areas. (Staffordshire Moorlands District Council)
- Probably best involve a combination of the three Options, according to circumstance and opportunity. (Natural England)
- The PPG17 approach to addressing need is considered to be the best way forward...The Options appear to have failed to address the need for enhancement (as opposed to redevelopment) of either the existing urban fabric or an existing natural landscape, both of which are recognised in the existing Policy QE2 but could still be improved. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response)

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	7	7%	8	9%	0	0%	15
LA - District	2	2%	12	13%	1	1%	15
Parish Council	9	10%	11	12%	0	0%	20
NDGB	4	4%	1	1%	0	0%	5
SEEP	17	18%	11	12%	0	0%	28
Business	2	2%	0	0%	0	0%	2
Individual	7	7%	1	1%	1	1%	9
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	48	51%	44	47%	2	2%	94

A range of suggestions were made for other strategic options which should be considered. There was emphasis on links to green infrastructure, biodiversity, climate change and other strategies, and recognising benefits for environmental enhancement. Currently focus is on brownfield but policy title is much wider than this. Comments included the following:

- An overall framework for restoration/redevelopment/provision of green infrastructure based on green infrastructure planning could guide the approach across all sites, rather than treat each site in isolation. This could form the basis of the Action Plans advocated in (e). (Natural England)
- The restoration of mineral sites offers significant large scale opportunities for biodiversity and landscape enhancement, recreation interest, flood amelioration as well as for establishing educational and cultural facilities. (Worcestershire County Council)
- Emphasis needs to be made on the need for enhancement. (WM Amenity Societies Association)
- Regeneration in the West Midlands is not just about urban brownfield sites, it is also about improving the environment in other locations, and there should be greater focus on this. (East Staffordshire Borough Council)

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.

Of those responding (74 consultees) 31% supported (a), relying primarily on targets and phasing, 72% supported (b), requiring Action Plans to be developed in the Major Urban Areas and regeneration zones, and 54% supported (c), improving the quality of land to make sites more attractive to developers .

Comments included the following:

- How are brownfield action plans different from previously developed land (PDL) strategies required by PPS3? (East Staffordshire Borough Council)
- A comprehensive approach as opposed to mutually exclusive alternatives. If pursued in isolation each would be too restrictive. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response)
- Basically they are all too prescriptive, let the local authority decide, give guidance by all means but do not dictate. (anonymous)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	11	9%	4	3%	0	0%	15
LA - District	17	13%	2	2%	0	0%	19
Parish Council	20	16%	2	2%	1	1%	23
NDGB	7	6%	0	0%	2	2%	9
SEEP	35	28%	4	3%	2	2%	41
Business	7	6%	0	0%	0	0%	7
Individual	9	7%	3	2%	0	0%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	106	84%	15	12%	5	4%	126

A large majority support the issues listed for policy QE4, although a number of respondents feel that (e) should not be included in its current form of wording, mainly because the requirement was felt to be too strong:

- Don't need brownfield AND green infrastructure plans on larger sites - do them together. (Member of WM Regional Sustainability Forum)
- (e). The requirements on local authorities to provide evidence to support LDF's are already onerous. (Newcastle under Lyme Council)
- (e) to be changed to 'encouragement'. It is not appropriate to require strategic planning authorities to produce Green Infrastructure Strategies. (Shropshire Council)

Common themes in suggestions for inclusion are: waterways; rural areas; geodiversity; green infrastructure networks; Public Rights of Way.

- (c) should also include protection and enhancement of landscape character in the list of delivery areas. (Staffordshire County Council)
- (d) should promote the importance of open/green space strategies (South Staffs Council)
- Green infrastructure is not just an issue with urban areas and growth points, it should also be considered in rural settlements. (Cannock Chase AONB)
- The need for effective green infrastructure master planning to connect green infrastructure (GI) assets (existing and new) and make provision across areas that have many individual developments will be essential. The specific importance of GI related to the Growth Points agenda should be promoted advocating up to 40% GI in common with the eco towns approach (National Forest Company)
- The need to protect and conserve existing greenspace is missing...We would like to see an emphasis on increasing the overall stock of urban trees carried forward from the existing policy QE4, the inclusion of urban characterisation in b), and a mention of ecosystem services in c). We would also like to see landscape mentioned as providing the context and framework for greenspace strategies and plans. (Shropshire Council)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	15	12%	2	2%	0	0%	17
LA - District	17	13%	0	0%	2	2%	19
Parish Council	22	17%	0	0%	1	1%	23
NDGB	8	6%	0	0%	2	2%	10
SEEP	35	27%	4	3%	1	1%	40
Business	6	5%	1	1%	1	1%	8
Individual	11	9%	0	0%	1	1%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	114	88%	7	5%	8	6%	129

There was a high degree of support for the issues listed for policy QE5. A range of comments were made for either exclusions or additions, although there were no particular themes emerging from the comments. Examples of comments are as follows:

- The connection between the historic environment and the natural environment should be made clearer, for instance in respect of historic landscapes and ancient trees and woodland. (Forestry Commission)
- In agreeing with the list of issues shown we would question what value they would add at a regional level (Worcestershire County Council)
- AWM would seek to ensure that a regional policy reflects positively upon the prospects for enabling inventive and innovative new uses for older buildings. (AWM)
- The historic environment is not sufficiently valued in the RSS or integrated with other policy areas. Its value is more than as a tourist attraction. (CPRE)
- (c) in some circumstances a focus on the specific site is necessary and appropriate...Clearly the policy revision will have to take account of the emerging changes in national policy with the publication of the consultation draft historic environment PPS. (The National Trust)
- We have serious doubts over enforced historic landscape characterisation requirements in the MUAs and would therefore not agree with option (i). Option (j) is unnecessary as it doesn't add value to the existing requirements of national policy. (Walsall Council)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	14	11%	2	2%	1	1%	17
LA - District	17	13%	2	2%	1	1%	20
Parish Council	21	17%	0	0%	1	1%	22
NDGB	8	6%	0	0%	1	1%	9
SEEP	33	26%	3	2%	2	2%	38
Business	6	5%	1	1%	0	0%	7
Individual	9	7%	5	4%	0	0%	14
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	108	85%	13	10%	6	5%	127

There was a high degree of support for the issues listed for policy QE6. A range of comments were made for either exclusions or additions, with common themes being:

- Landscape encompasses biodiversity and the historic environment, and needs to be seen as a more overarching section;
- Should emphasise that local decision makers need to allow for positive change;
- What is the value of the policy at regional level? It either repeats national policy or deals with issues appropriately dealt with at local level.
- Public Rights of Way should be included.

Other comments included the following examples:

- It is essential that part B iv) of the old policy, relating to the importance of the use of Landscape Character Assessment by Local Authorities in developing their plans, policies and proposals, is added to this policy. (Staffordshire County Council)
- We would wish to see the RSS include a policy similar to those in the South West and South East to cover overall AONB policy and then for the LDFs, supported by the statutory AONB Management Plans, to identify local issues for the AONBs within their area. (Cannock Chase AONB)
- An equivalent to issues (g) and (h) in the options for QE5 would be useful for landscape. (Worcestershire County Council)
- Many of the issues suggested for inclusion in the policy and text could be addressed through Local Development Frameworks. (Staffordshire Moorlands District Council)
- We suggest that a wider ‘landscape approach’ should be reflected in a new Policy QE1 or an equivalent overarching policy in a Regional Strategy. However, we still feel that it is appropriate to include a specific policy focused on landscape planning, protection and management. (Natural England)
- (f) Issues such as tranquillity, noise and light pollution are typically dealt with by agencies or departments within local authorities other than planning. (Herefordshire Council)
- The European Landscape Convention does not require strategic planning authorities to prepare action plans...Urban characterisation as a tool should be added in (e). (Shropshire Council)

5.6

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?

Organisations:	Agree with proposed targets	%	Disagree with proposed targets	%	No option ticked but response	%	Total
LA - County or Unitary	3	3%	11	10%	0	0%	14
LA - District	12	11%	1	1%	2	2%	15
Parish Council	18	17%	3	3%	2	2%	23
NDGB	5	5%	2	2%	0	0%	7
SEEP	19	18%	12	11%	1	1%	32
Business	2	2%	1	1%	0	0%	3
Individual	7	7%	3	3%	1	1%	11
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	66	63%	33	31%	6	6%	105

Two thirds of respondents agreed with the proposed targets in Annex C, with the principle of the inclusion of targets broadly supported including by a number of key stakeholders such as Natural England, the West Midlands Biodiversity Partnership and the Woodland Trust.

In the case where respondents disagreed with the proposed targets, the questionnaire asked respondents to give reasons why. Common reasons were that the targets are not yet fully agreed or that they are too ambitious. Detailed comments were given on individual targets, and it was also observed by some that the majority of BAP management activity falls outside of the scope of the planning system and it was unclear what the RSS hopes to achieve by inclusion.

Examples of other comments are as follows:

- We would support the views of the West Midlands Biodiversity Partnership on this. (Woodland Trust)
- Natural England supports the inclusion of revised Targets within RSS, but recommends that greater clarity is given to within the policy to their delivery. (Natural England)
- A full and detailed response has already been sent from the Herefordshire Biodiversity Partnership to the Regional Biodiversity Co-ordinator outlining a number of serious of errors and anomalies in the targets suggested. (Herefordshire Council)
- In terms of approaches to the management of environmental resources none of the three options is appropriate for what are essentially local decisions to be made by local people and a flexible approach is required. (Hereford City Council)
- There is high potential for conflict between the objectives of policy QE2 and the targets set out in policy QE7. (Walsall Council)
- There is no mention of delivery mechanisms, without which the targets will not be achieved. (Worcestershire County Council)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	12	11%	2	2%	2	2%	16
LA - District	14	12%	1	1%	2	2%	17
Parish Council	20	18%	1	1%	0	0%	21
NDGB	7	6%	0	0%	0	0%	7
SEEP	26	23%	7	6%	2	2%	35
Business	5	4%	1	1%	0	0%	6
Individual	7	6%	4	4%	0	0%	11
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	91	81%	16	14%	6	5%	113

A large majority of respondents agreed with the list of issues for policy QE7. However, there was some concern over the requirement for local opportunity maps, and a feeling that the policy would either repeat national guidance or cover areas more appropriately dealt with at local level. There was a call for cross-referencing to green infrastructure policy, and for greater inclusion of geodiversity throughout the issues.

Examples of other comments include the following:

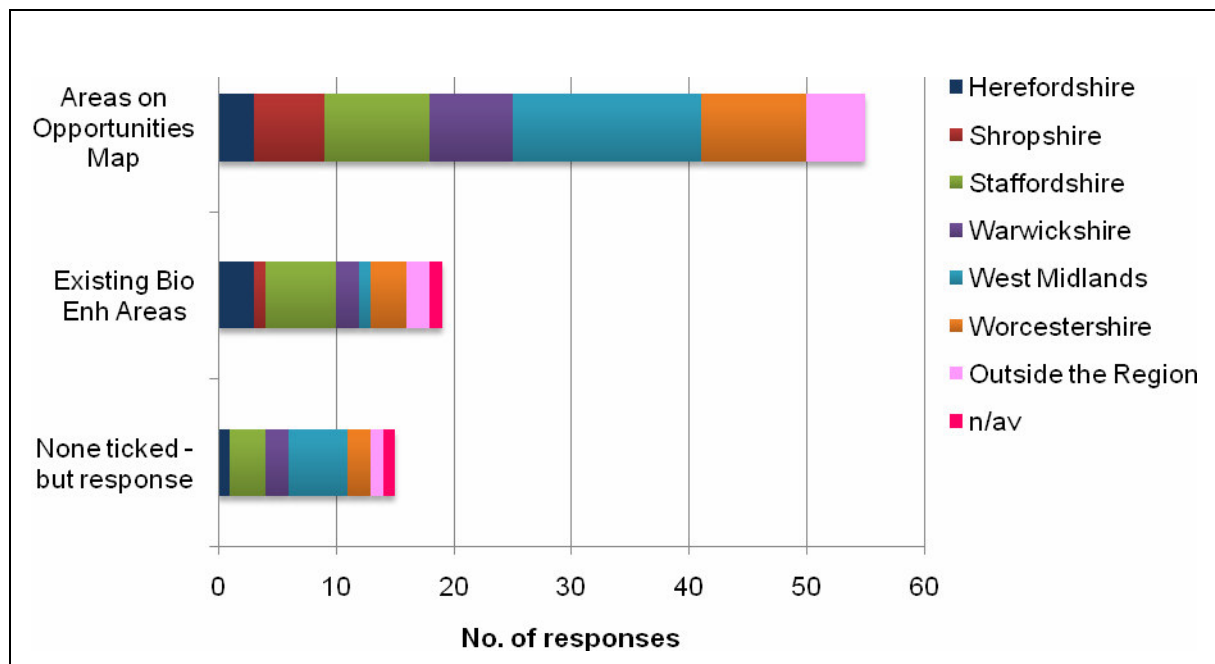
- There is no statutory duty on local authorities to ensure beneficial management of local sites. What does now exist is an obligation on local authorities to report on the proportion of local sites in beneficial management for National Indicator 197. (Worcestershire County Council)
- A further policy issue that should be considered relates to the mitigation that will be required following the Habitat Regulations Assessment where European sites may be affected by the WMRSS and its policies. (West Midlands Wildlife Trusts)
- Climate change considerations, including anticipating climate change impact on habitats and preparing for mitigation measure to protect the region’s landscape value, biodiversity and visitor economy, should be

included. (AWM)

- This is an aspirational list of policy issues. In many cases it is unclear how they are linked to and can be delivered via the regional planning system. (West Midlands Business Council)
- Policy should also recognise the potential for biodiversity enhancement associated with new built development. (Rugby Radio Station)

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?

Organisations:	Biodiversity Enhancement Areas	%	Regional Opportunities Map	%	No option ticked but response	%	Total
LA - County or Unitary	0	0%	8	9%	5	6%	13
LA - District	5	6%	7	8%	3	3%	15
Parish Council	7	8%	7	8%	2	2%	16
NDGB	0	0%	7	8%	0	0%	7
SEEP	1	1%	20	22%	2	2%	23
Business	2	2%	1	1%	1	1%	4
Individual	4	4%	6	7%	2	2%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	19	21%	56	62%	15	17%	90



The Regional Opportunities Map had much greater support than Biodiversity Enhancement Areas, as it was felt to be more up to date, reflects stakeholder consultation, covers a wider area and is more refined. There was some feeling that both should be used.

- The WMBP has been working with partners to develop this regional 50 year vision and opportunity map. The map is the culmination of over 2 years work including advice from consultants and wide stakeholder engagement through the regional and local biodiversity partnerships. The map was developed specifically to identify priority areas for delivery whilst also showing priorities for delivery across the whole region. It was specifically developed to address concerns that stakeholders had about the current approach of focusing resources within the Biodiversity Enhancement Areas (BEAs). (West Midlands Biodiversity

Partnership)

- The Wildlife Trusts support a balanced approach using the benefits of Regional Habitat Targets together with the focus provided by the Regional Opportunity Map . (West Midlands Wildlife Trusts)
- These are not mutually exclusive and should both be incorporated into policy QE7 making clear that while Biodiversity Opportunity Areas are priorities, there is potential for contribution to BAP targets and ecological connectivity and functioning ecosystems. (Staffordshire County Council).

5.7

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	14	12%	1	1%	1	1%	16
LA - District	16	13%	0	0%	2	2%	18
Parish Council	19	16%	0	0%	1	1%	20
NDGB	8	7%	0	0%	1	1%	9
SEEP	30	25%	6	5%	2	2%	38
Business	5	4%	0	0%	1	1%	6
Individual	9	8%	3	3%	0	0%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	101	85%	10	8%	8	7%	119

There was a high degree of support for the issues listed for policy QE8. A range of comments were made for either exclusions or additions, with common themes being:

- Policy QE7 and QE8 should be complementary. Account should be taken of biodiversity targets for other habitats as well as woodland to avoid conflict.
- Stronger reference to woodland creation being linked to a landscape character approach;
- There should be cross-referencing between policies on Trees, Forestry and Woodland with Agricultural Land.

Examples of other comments include the following:

- The Policy must make clear reference to both the Regional Forestry Framework and the Strategy for England’s Trees Woods and Forests, which both have a strong influence on regional forestry policy and delivery. (Forestry Commission)
- (b) should include urban woodland. (Worcestershire County Council)
- The policy needs to better reference the relevant economic factors of the industry. (AWM)
- In (g) suggest that the words “mitigation for adverse air quality effects” is added. (Dudley MBC)
- We are concerned to understand the relationship between policy QE6 and QE8, and to what degree a more comprehensive approach to Policy QE4 could be used to reduce the content of Policy QE8. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response)
- Amalgamate with QE5, 6, 7, and Agricultural Land under Landscape heading. (Country Land and Business Association)

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	12	11%	0	0%	1	1%	13
LA - District	13	12%	3	3%	2	2%	18
Parish Council	23	20%	0	0%	1	1%	24
NDGB	6	5%	0	0%	2	2%	8
SEEP	25	22%	6	5%	2	2%	33
Business	4	4%	0	0%	0	0%	4
Individual	12	11%	0	0%	1	1%	13
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	95	84%	9	8%	9	8%	113

There was a high degree of support for the issues listed under agricultural land protection. There were few comments, some calling for a policy and some highlighting the relevance of economic issues to agriculture which does not sit well in the Quality of Environment section.

- The importance of protecting land, i.e. best and most versatile agricultural land, for food production is a justifiable issue for the RSS, particularly in the context of climate change. (Worcestershire County Council)
- It is important to protect agricultural land not only for food production but also for diversification of the rural economy such as energy crops. (AWM)
- 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 (Bromsgrove DC)
- A Regional policy which gives a clear lead on the importance of the countryside for food production, including the economic benefits of a thriving agricultural economy, would help to inform the assessment of those forms of agricultural activity which require planning applications. (Herefordshire Council)
- The issue of improving soil quality needs to be specifically included in the RSS. (CPRE)
- Addition of horticulture and equine use in rural areas. (Stafford Borough Council)
- We question the need for inclusion of these paragraphs within the WMRSS either in their existing or an updated form, given national policy and the absence of any regionally specific references. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response)
- Issue (e) should also include geodiversity. (Black Country Geodiversity Partnership)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	15	13%	1	1%	1	1%	17
LA - District	15	13%	1	1%	3	3%	19
Parish Council	18	15%	1	1%	2	2%	21
NDGB	7	6%	0	0%	2	2%	9
SEEP	28	24%	6	5%	4	3%	38
Business	2	2%	2	2%	0	0%	4
Individual	7	6%	4	3%	0	0%	11
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	92	77%	15	13%	12	10%	119

Three quarters of respondents agreed with the list of issues for QE9. Common themes emerging from the comments include:

- RSS should not replicate or add to national policy and should focus instead on those issues which are considered to be of regional significance
- (f) should not impose a blanket requirement on all local authorities to prepare Water Cycle Studies.
- The policy should not just cover water quality and related issues. The current QE9 had a wider policy context.
- Strengthen recognition of climate change as an issue in water management.
- Cross-boundary issues need to be considered, particularly with Wales.

Other comments included the following:

- Support proposed change and emphasise the need for accurate high quality data and regular monitoring. (Warwickshire County Council)
- We agree with the proposed revision of text and policy content for QE9 and would highlight the need for policy content to compliment and support other policies such as Biodiversity, Recreation, Flood Risk and Green Infrastructure. (Environment Agency)
- Overall, the Wildlife Trusts welcome and support this policy. We would like to stress our support for the policy to address issues a), b), e), h) and i), in particular. (West Midlands Wildlife Trusts)
- Questionable if RSS should place a requirement on all local authorities to include water efficiency policies in their LDF's, rather than provide an overarching policy on the issue itself. (Newcastle under Lyme Council)
- (h) Protection, management and enhancement of small rivers and banks to lengthen wildlife corridors. (Rowney Green Association)
- Point source pollution is not included under criterion (d). (Worcestershire County Council)
- The RSS should focus on issues of regional significance, namely River Basin Management Plans, the implications of major growth on the water environment, circumstances where there is a need for Water Cycle Studies, and the region's strategic river corridors. (Staffordshire Moorlands District Council)
- The existing QE9 policy makes reference to the wider economic and environmental benefits (which would include access and recreation) of river and inland waterway corridors. This should be covered in this policy, alongside green infrastructure....We also feel that the climate change logic cited for the flood risk issue (l) is also key to QE9. It justifies the further issue of promoting water neutrality by demand management, as an essential adaptation response to climate change led drought and increased total demands from an increasing population. (Natural England)

- We think there is a need to also identify the landscape and amenity value of river corridors, both in rural and urban areas. (CPRE)
- (b) The council does not consider that it is acceptable to ensure all authorities adhere to all recommendations within River Basin Management Plans, as these could have dramatic impacts in terms of growth and the location of housing. There needs to be greater cooperation and understanding between the Environment Agency, and it is not acceptable for the RSS to impose such a requirement. (East Staffordshire Borough Council)
- It should be made clear who is expected to deliver actions arising from the issues. (Shropshire Council)
- With reference to issue (g) we wish to identify that specific local considerations need to be balanced, particularly in respect of Sustainability Appraisal and Spatial Development Strategy considerations. (Telford & Wrekin Council)
- (j) Recognises the importance of applying the tiered Environmental Risk Assessment Framework to activities that may impact groundwater resources to prevent the risk of pollution (Environment Agency)

5.10 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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	12	11%	0	0%	2	2%	14
LA - District	16	15%	0	0%	4	4%	20
Parish Council	20	19%	0	0%	2	2%	22
NDGB	8	8%	0	0%	0	0%	8
SEEP	24	23%	1	1%	1	1%	26
Business	4	4%	0	0%	0	0%	4
Individual	10	9%	2	2%	0	0%	12
Individual - G&T	0	0%	0	0%	0	0%	-
TOTAL	94	89%	3	3%	9	8%	106

There was a high degree of support for the issues listed under air quality. Some respondents felt there was a need for a specific policy. However, more questioned the usefulness of the issue being addressed in RSS.

- Care needs to be taken at regional level to make policies practical and implementable – there is no point having a policy which requires local planning authorities to exercise functions for which they have no powers. (Herefordshire Council)

Examples of other comments:

- The current RSS states that the RPG and the RPB should identify areas where air quality issues are likely to be of Regional Significance, assess their implications and where appropriate, set out policies and measures to address them. The Council questions whether any air quality issues of regional significance have been identified. Given the number of AQMAs designated in recent years, it appears that a number of air quality issues have been identified, therefore a need exists to include details on what policies have been developed. (South Staffs Council)
- Add to B – ‘as well as to cycling and walking and other sustainable transport modes’. (Ramblers Association - Staffordshire area)
- Should support the overall strategy of urban renaissance by emphasising the importance of a sustainable settlement pattern and its ability to contribute to improved air quality for the region. (Walsall Council)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	12	12%	3	3%	1	1%	16
LA - District	14	14%	0	0%	1	1%	15
Parish Council	20	20%	0	0%	1	1%	21
NDGB	7	7%	0	0%	0	0%	7
SEEP	22	22%	5	5%	0	0%	27
Business	4	4%	0	0%	0	0%	4
Individual	9	9%	1	1%	2	2%	12
Individual - G&T	0	0%	0	0%	0	0%	-
TOTAL	88	86%	9	9%	5	5%	102

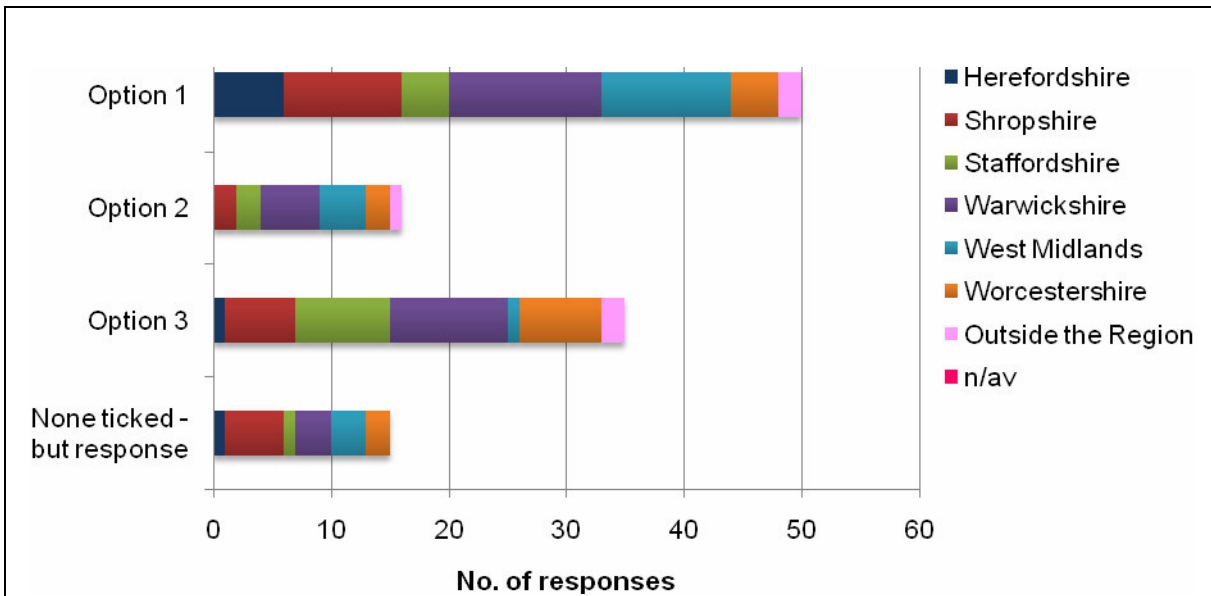
The majority of respondees (86%) agreed with the concept of an over-arching policy on Integrated Management of Environmental Resources and that the list of issues includes many of the important elements.

Comments from respondees included:

- As the over-arching environmental policy it should be placed at the beginning of the Quality of the Environment section. (Forestry Commission)
- Strengthen the wording - the policy should set out that Local Authorities, agencies and others in their Development Plan Documents and other strategies should "embed" rather than "establish" key environmental principles. The overall direction and tone of this policy should be more ambitious. Terms such as "no net loss" and "minimising harm" are outdated and do not meet current planning policy guidance – eg, PPS9 Biodiversity and Geological Conservation stresses the requirement for enhancement; similarly in relation to draft PPS15 Planning for the Historic Environment. (West Midlands Wildlife Trusts)
- Adding examples of delivery mechanisms under issue (i) would aid understanding; add issues of building and environmental design quality; international / global environmental goals. (Shropshire Hills AONB Partnership)
- The concept of an overarching policy on integrated strategy is a good idea however this must include greater links with the economic and social aims to be fully sustainable and integrated. (Country Land and Business Association)

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

Organisations:	Option 1 Environment Led	%	Option 2 Development Led	%	Option 3 Spatial Strategy	%	No option ticked but response	Total responses
LA - County or Unitary	9	7%	0	0%	7	6%	1	17
LA - District	5	4%	2	2%	11	9%	5	23
Parish Council	11	9%	3	2%	5	4%	2	21
NDGB	4	3%	1	1%	1	1%	1	7
SEEP	18	15%	7	6%	5	4%	4	34
Business	1	1%	0	0%	4	3%	0	5
Individual	6	5%	4	3%	3	2%	3	16
Individual - G&T	0	0%	0	0%	0	0%	0	0
TOTAL	54	44%	17	14%	36	29%	16	123



None of the 3 options on its own stands out as being the most popular, but generally more support for Options 1 and 3 and a combination of options. Option 2 alone was less popular since the development led approach is seen as not giving adequate recognition to the high quality assets of the region outside areas of significant growth. Many consultees feel that the three options should not be seen as mutually exclusive and different options may well be appropriate in different parts of the Region.

5.12 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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	13	10%	1	1%	3	2%	17
LA - District	17	13%	3	2%	2	2%	22
Parish Council	19	15%	1	1%	1	1%	21
NDGB	9	7%	0	0%	2	2%	11
SEEP	32	25%	4	3%	0	0%	36
Business	5	4%	0	0%	1	1%	6
Individual	10	8%	2	2%	2	2%	14
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	105	83%	11	9%	11	9%	127

Comments were provided on specific issues such as (h), (f), (k) - for example:

- the retrofitting of SUDS (item (h)) to existing properties may not always be practicable;
- the requirement for all new infrastructure to avoid flood risk areas (item (f)) is contrary to PPS25;
- there should be more emphasis on flood management as a function of green infrastructure (item (k)).

Some concerns were also expressed that the RSS is addressing issues which are more appropriately addressed through Local Development Frameworks and are not a regional matter.

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?

	Yes	%	No	%	No option ticked but response	%	Total
Organisations:							
LA - County or Unitary	13	12%	1	1%	1	1%	15
LA - District	12	11%	2	2%	4	4%	18
Parish Council	20	18%	2	2%	1	1%	23
NDGB	6	6%	0	0%	0	0%	6
SEEP	27	25%	2	2%	1	1%	30
Business	1	1%	0	0%	2	2%	3
Individual	11	10%	2	2%	0	0%	13
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	90	83%	9	8%	9	8%	109

There was a high level of agreement on the need for the existing Policy EN2 to be revised to encourage improvements to the energy efficiency in existing buildings as opportunities arise. However, some Local Authorities question the ability of the planning system to influence the energy efficiency of existing buildings and suggest that this is not a suitable topic for RSSs, instead being more of a matter for implementation of national building regulations and specific Supplementary Planning Documents at the local level; and that this issue is already being addressed by policy SR3 in the Phase 2 revision Preferred Option. Examples of responses:

YES:

- Regional Policy could encourage local authorities to adopt policies in their LDFs that seek to tackle energy efficiency within the existing housing stock. (Cannock Chase District Council)
- The existing building stock is one of the biggest contributors to UK carbon emissions. However, we question the ability of the planning system to influence the energy efficiency of existing buildings and suggest that this is not a suitable topic for RSS. (Telford & Wrekin Council)
- We support the move to insulate homes and feel that all new builds should be effectively insulated to prevent thermal losses. We also support the Combined Heat and Power (CHP) initiatives. However, the policy should adopt a pragmatic approach and it should not introduce new terms and conditions that would place the West Midlands construction industry at a competitive disadvantage to other regions. (Federation of Small Businesses)
- We think that the EN policies should encourage improvements to energy efficiency where viable. However this should not undermine the overall strategy by imposing onerous requirements for energy generation policies on local authorities where many sites within their boundary are of marginal viability. (Walsall Council)

NO:

- More appropriate to use nationally required standards (e.g. Building Regulations) to drive up efficiency rather than local aspirational policies which are unlikely to be as effective. (Stafford Borough Council)
- 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. (Bromsgrove District Council)
- We question the ability of the planning system to influence the energy efficiency of existing buildings and suggest that this is not a suitable topic for RSS. (Shropshire Council)
- It could be argued that Policy SR3 I in the Phase 2 revision Preferred Option already covers this point to the same extent. Energy efficiency of the existing built stock is a key concern that has yet to be properly

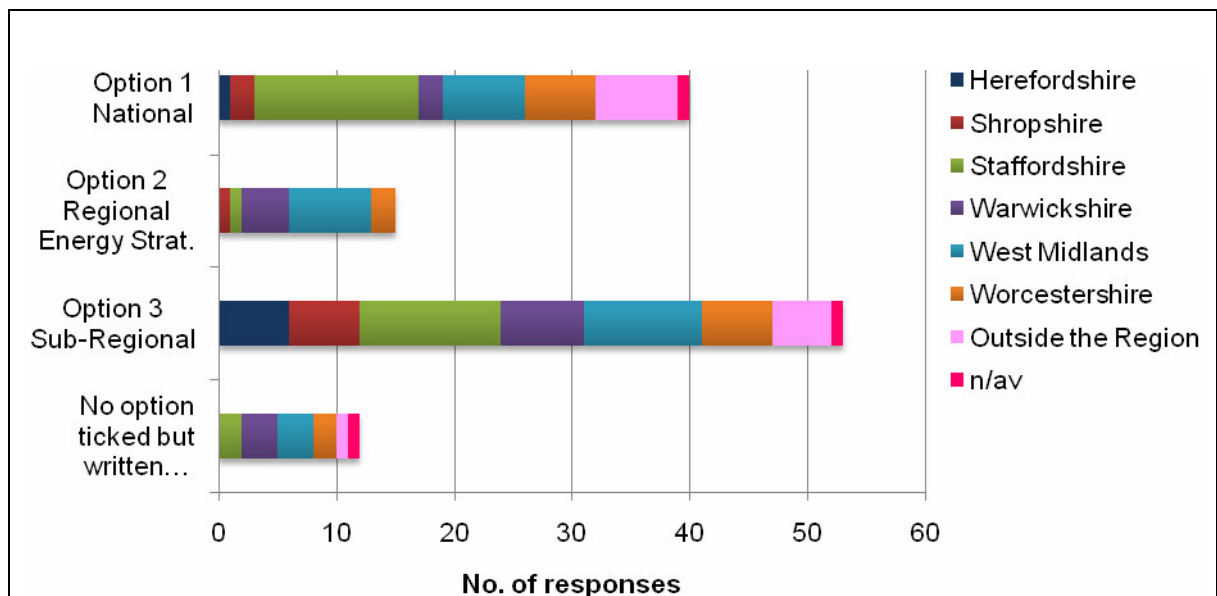
addressed at national or regional level. Both this option and the current draft SR3 I can only "encourage" or "seek opportunities", and the effectiveness of this wording is probably insufficient to make much impact in overall net terms on the efficiency of the Region's stock. (Worcestershire County Council)

- The Council would not want an overly prescriptive policy to be included which did not allow for local evidence to determine the most appropriate course of action. (South Staffs Council)
- It would be confusing to introduce a further policy since this question is already addressed by draft Policy SR3 considered in the RSS Phase Two Revision. However, if kept, this section should be redrafted to have closer regard for the Government's recent announcement on achieving zero carbon by 2016. The energy hierarchy approach proposed should be amended to incorporate the Government's range of allowable solutions. (Home Builders Federation).

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).

Organisations:	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	%	No option ticked but response	Total
LA - County or Un.	5	4%	4	3%	10	9%	1	20
LA - District	5	4%	6	5%	12	10%	1	24
Parish Council	5	4%	1	1%	13	11%	1	20
NDGB	2	2%	2	2%	1	1%	1	6
SEEP	18	15%	2	2%	10	9%	5	34
Business	2	1%	0	0%	0	0%	0	1
Individual	4	3%	1	1%	6	5%	2	12
Individual - G&T	0	0%	0	0%	0	0%	0	0
TOTAL	41	33%	16	14%	52	45%	11	117

Note: These figures includes 3 responses ticking Option 1 and 3; and 4 responses ticking option 2 and 3.



A wide range of opinion and no clear consensus; although Option 3 is the most popular (44% of respondees), including amongst Local Authorities, with some respondees in favour of a combination of Option 1 and 3, ie. adopt national targets with sub-regional variation to reflect resources and needs. Reasons given for selection of options include the following.

- **Option 1- Adopt national target for renewable energy:** National targets should come first – and these can then be apportioned across the region. Any option should be based on and be complementary to recent Government statements, such as ‘The UK Low Carbon Transition Plan’ and ‘The UK Renewable Energy Strategy’ which emphasise the step change required in delivery of renewable energy resources.
- **Option 2- Adopt Regional Energy Strategy targets for renewable energy:** The Region cannot respond to all elements of the national agenda (eg. as a non-coastal region) and that some sub-areas may have significant constraints. “Revised regional targets need to reflect regional opportunities - national policy appears to promote wind - wind is not ideal for the West Midlands”. Sub-regional targets are not suitable because of the difficulties of measurement and potential competition between sub-regions.
- **Option 3 - Sub-regional targets for renewable energy:** Option 3 would be evidence-based and therefore the targets would be more realistic. Option 3 might provide incentives and thus economic benefits for the faster development of emerging technologies. Sub-regions have own resources and needs are easier to identify. Option 3 is consistent with the need for responsibility in the delivery of renewable energy targets to filter down to a more local level, where decision making takes place - local plan-makers also have a statutory duty to take action on climate change.

Also, there is a need for consistency in expressing targets - the national target refers to percentage of energy generated; whilst the regional targets refer to percentage of energy consumed. Plus comments on the need for the renewable energy section to be worded more positively and ‘dynamically’ in line with the economic opportunities, importance and scale of change required to meet carbon reduction targets

Examples of responses to the alternative options:

Option 1- Adopt national target for renewable energy:

- Need to go with a strong national lead if we are to have any hope of achieving these targets (West Midlands Faiths Forum).
- Option 1 combined with Option 3 to enable better management and target setting - sub regions have specific resources and needs are more easy to identify. (Stafford Borough Council)
- Option 1 in conjunction with Option 3. Option 2 is not preferred for a series of reasons. Firstly it will knowingly fall short of government targets on renewable energy generation as set out in the Energy White Paper. PPS1 Climate Change paragraph 13ff requires that regional planning bodies should “set regional targets for renewable energy generation in line with PPS22 (paragraphs 2-5) and ensure their ambition fully reflects opportunities in the region, are consistent with the Government’s national targets and, where appropriate in the light of delivery, are periodically revised upwards;” Although Option 2 involves adopting the regional targets set out in the Regional Energy Strategy (RES) the strategy was published in 2004. (Staffordshire County Council)
- The Regional Energy Strategy targets pre-date the Climate Change Act mandatory CO₂ emissions targets of 80% cut by 2050. (AONBs).

Option 2- Adopt Regional Energy Strategy targets for renewable energy:

- A preference for Option 2 on the basis that sub-regional targets are not suitable because of the difficulties of measurement and potential competition between sub-regions. (Coventry City Council)
- There is a need for a target/targets to be set below national level to reflect the Region’s specific circumstances. For example the West Midlands is the only region without a coastline and therefore, is excluded from or has fewer opportunities to exploit certain technologies. PPS22 Renewable Energy gives the option of specifying sub-regional targets. Whilst there is some support for this in the Metropolitan Area, given that opportunities differ between urban and rural parts of the region (e.g. less scope for wind turbines in the built up area), there is some doubt as to whether a credible evidence base is available. (WM Planning & Transportation Sub-Committee)

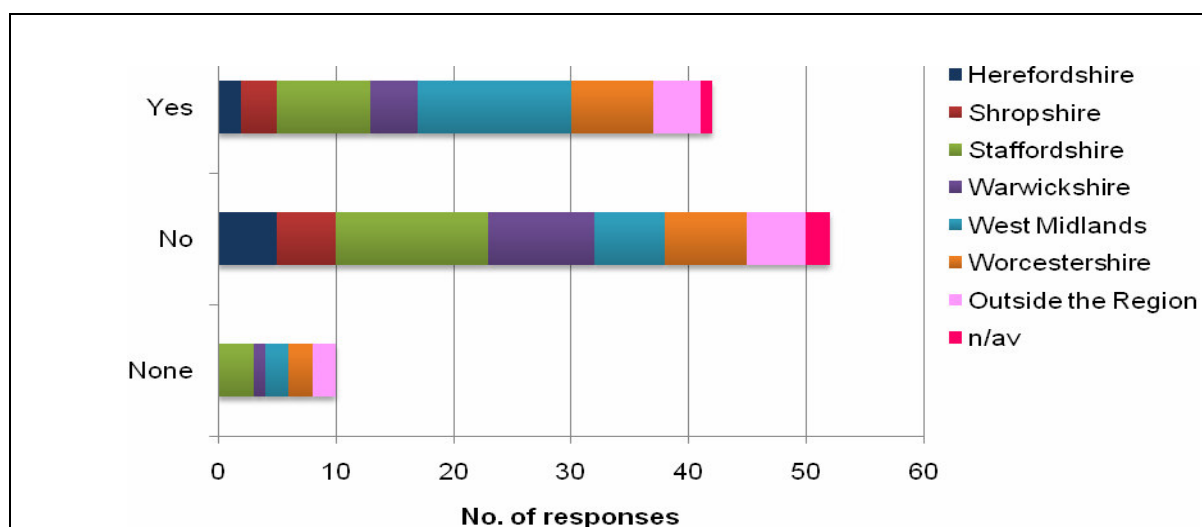
- We feel that the way the Options are framed on page 90 could lead to confusion - the national target refers to percentage of energy generated; whilst the regional targets refer to percentage of energy consumed... Since the Options were issued the UK Low Carbon Transition Plan and supporting UK Renewable Energy Strategy have been published; and this changes the national policy context. The three Options present a slightly artificial choice since all three are linked. To pursue one at the expense of the other two would be premature in the absence of the approach outlined below. We have selected Option 2 because it most closely matches our preferred approach. We believe that the region should contribute its appropriate share of the new national targets; but that the regional targets should be based on an evidence-based assessment of the region's capacity to deliver the various forms of renewable energy. ...From such an assessment, sub regional targets could be developed that reflect the capacity of different parts of the region to accommodate and support the different technologies. This work could form the basis of a revised Regional Energy Strategy. We believe that this approach would be consistent with the UK Renewable Energy Strategy. (Natural England)

Option 3 - Sub-regional targets for renewable energy

- BWEA recommend Option 3, as responsibility for the delivery of renewable energy targets should filter down to a more local level, where decision making takes place; local plan-makers also have a statutory duty to take action on climate change. However, this should be framed within an ambitious overall regional target that reflects the national target (akin to that set out in Option 1) so as to ensure responsibility and cohesiveness at a regional level to deliver significant renewable energy capacity. (British Wind Energy Association)
- Option 3 might provide incentives and thus economic benefits for the faster development of emerging technologies. However, targets should be developed in partnership with strategic planning authorities. We also suggest that the sub-regional targets be derived from at least the national targets (or higher) rather than the Regional Energy Strategy targets. The amount of energy generated from renewable sources in the West Midlands is extremely low at the present time and, we suggest, unacceptable. We need to set the highest possible targets to try and stimulate change. If option 3 is taken forward, it should also look at the potential for each sub-region to supply heat and produce transport fuel from renewable sources. Option 1 does not provide enough guidance as to how each local authority might meet the target, and runs the risk that developers will go for the cheapest and easiest option to meet it. This means wind energy with the result that Shropshire and Herefordshire (which have the best wind potential in the region) might end up bearing a disproportionate environmental cost. Whichever target is chosen, it must be capable of being easily updated to take account of changing national circumstances. Consultees felt that there should be resources made available for small scale energy efficiency and micro regeneration schemes in houses and buildings. (Shropshire Council)
- This approach allows the different character of areas of the Region to be reflected with different targets and differing methods of meeting targets eg. Hereford may use wind farms, whereas they are unlikely to be suitable in Birmingham though solar roofing may be more effective in major urban areas. (Birmingham City Council)

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	1	1%	13	13%	1	1%	15
LA - District	5	5%	8	8%	4	4%	17
Parish Council	11	11%	8	8%	1	1%	20
NDGB	5	5%	1	1%	1	1%	7
SEEP	14	14%	13	13%	3	3%	30
Business	1	1%	1	1%	0	0%	2
Individual	5	5%	7	7%	0	0%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	42	41%	51	50%	10	10%	103

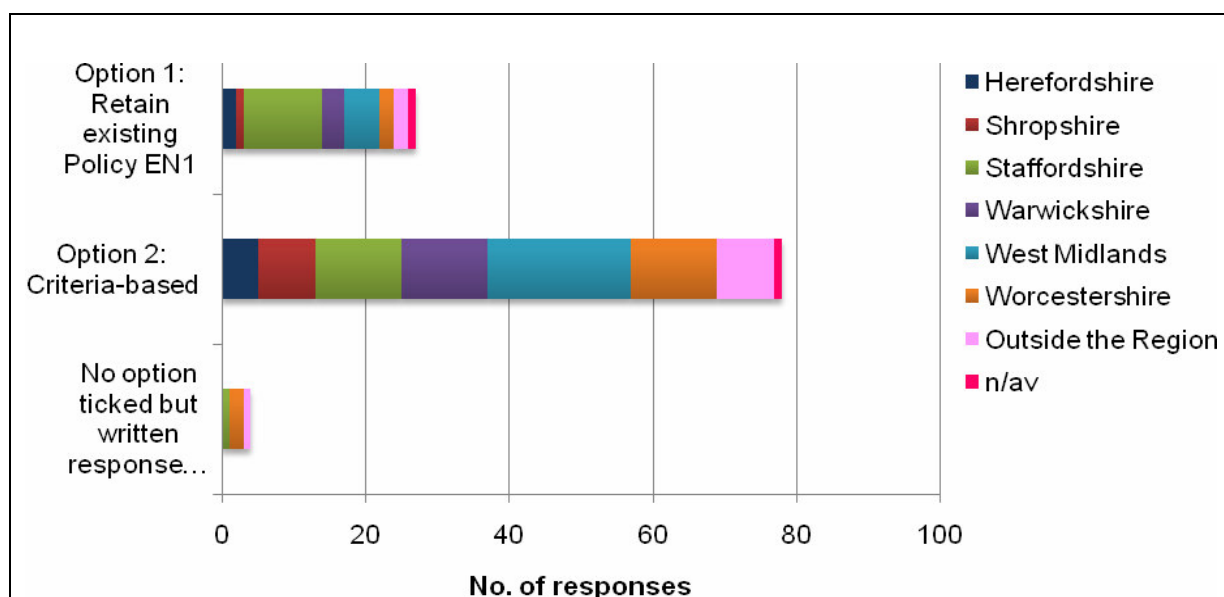


A range of opinion was given with no clear consensus. However, the majority of LAs (particularly County and Unitaries) are against regional targets for specific renewable energy and low carbon technologies. Responses include:

- **“Yes”:** Regional targets would give a strong steer on the appropriate mix for the region. Setting targets would help to promote these technologies and give a better basis for more local policies in the LDFs. “Yes, although it is considered that these should be disaggregated to the sub regional level”. (Wyre Forest District Council)
- **“No”:** Such an approach would be inflexible to future changes in technology and policy. “Until we have some evidence at a regional/county level it is pointless to set targets” (Member of South Staffordshire District Council). “We must avoid being too prescriptive about how energy will be generated and retain flexibility to adapt to new technologies” (Shropshire County Council). Targets for specific technologies are best set at the local level on the basis of more detailed local work on capacity.

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

Organisations:	Option 1 - Retain existing Policy EN1	%	Option 2 -Criteria-based policy	%	No option ticked but response	Total responses
LA - County or Unitary	8	7%	8	7%	1	17
LA - District	6	5%	8	7%	3	17
Parish Council	6	5%	15	13%	0	21
NDGB	1	1%	7	6%	0	8
SEEP	3	3%	25	21%	1	29
Business	1	1%	2	2%	0	3
Individual	2	2%	10	9%	0	12
Individual - G&T	0	0%	0	0%	0	0
TOTAL	27	23%	75	64%	5	107



64% of respondents to this question favoured Option 2 “Criteria-based policy to ensure that renewable energy is appropriately located”. However, opinion is split amongst the Local Authorities.

Arguments in favour of **Option 1** include: Option 1 will give Councils the flexibility to draft criteria that take into account the assessment of renewable and low carbon energy potential within their area. Decisions should be subjective and discretion should be allowed for each local planning authority to determine their own criteria. The landscapes and characteristics of the different parts of the region are so diverse that it may prove difficult to define, at the regional level, the relative importance of different criteria. The RSS should not be setting criteria, this is too detailed for this document.

Arguments in favour of **Option 2** include that it is a requirement of national policy (PPS22) and that it will provide a clear, consistent and objective approach to ensure whether applications for renewable energy and low carbon technologies are appropriately located. However, the policy must be supported by a robust evidence base and developed in partnership with all the local authorities.

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.

Rating of importance:	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)
5 = most important	22	22	25	11	10	13	24	
4	15	12	16	14	14	8	13	
3	4	16	9	16	12	20	7	
2	10	5	7	12	12	15	7	
1	4	4	3	6	11	3	6	
0 = least important	5	2	1	2	1	1	1	
Total responses	60	61	61	61	60	60	58	36

Note: 66 respondents gave answers to ENV22.

Overall, the criteria considered of most importance (rated 5 and 4 by respondees) were:

- 1 Impact on fauna, flora and animal life – 41 responses
- 2= Contribution to the global environment – 37
- 2= Visual Impact – 37
- 4 Contribution to the local economy - 34
- 5 Noise - 25
- 6 Odour - 24
- 7 Traffic - 21

Around 20 respondees commented that providing ranking of importance at a regional level is inappropriate since the relative level of importance of issues will vary between different areas.

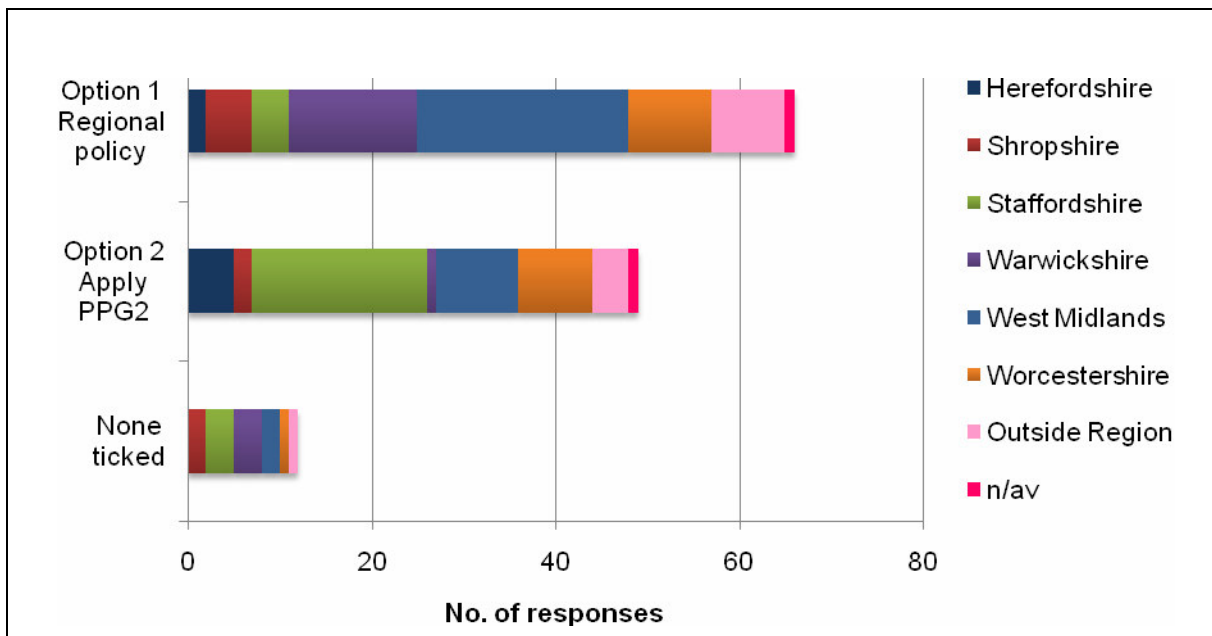
Other factors identified as important include:

- Availability and proximity to renewable energy source
- Community benefits
- Quality of life
- Community ownership and participation
- Local demand/community needs
- Effect on existing businesses
- Defence and aviation issues.
- Effectiveness of the technology
- Health impacts
- Safety
- Impact on historic environment and heritage assets and their settings
- Impact of transmission requirements/connection to national grid
- Contribution to national and regional strategy guidance/targets
- Overall carbon benefit
- Air quality impacts
- Security of supply to a locality
- Vibration – erosion and impact on wildlife

5.14 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?

Organisations:	Option 1- Regionally Specific Policy	%	Option 2- Apply PPG2	%	No option ticked but response	%	Total responses
LA - County or Unitary	4	3%	11	9%	2	2%	17
LA - District	9	7%	10	8%	1	1%	20
Parish Council	15	12%	7	6%	2	2%	24
NDGB	6	5%	0	0%	1	1%	7
SEEP	24	19%	9	7%	3	2%	36
Business	3	2%	3	2%	1	1%	7
Individual	4	3%	8	6%	1	1%	13
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	65	52%	48	39%	11	9%	124



Opinion is split between Option 1 and Option 2, although 11 out of 15 Unitary and County Authorities favoured Option 2. Reasons given for responses include the following.

- Option 1: Develop a Regionally Specific Green Belt Policy:** Option 1 will allow for the identification of more positive uses through green infrastructure studies, such as improved access and recreation; to reflect the varying needs of people and wildlife. Support for a more regionally specific policy which reinforced green infrastructure, heritage and landscape considerations in improving the Green Belt. “Option 2 represents ‘old thinking’ with respect to urban fringe management and does not adequately address the need for an integrated relationship between Green Belt and other existing and suggested WMRSS policies (such as Green Infrastructure)”. Some local authorities also called for RSS to review the geographic area of the Green Belt in the context of sub-regional location of housing growth and to develop distinctive sub-regional specific policies related to anticipated pressures, its function, protection and management.

- **Option 2: Apply PPG2:** “ PPG2 is already sufficiently clear and particular issues and opportunities will often be specific to location and as such should be addressed in LDFs”. “Option 1 could potentially lead to proposals taking place within the Green Belt as part of *positive use and improvement* proposals which could actually damage the Green Belt”. “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 which could undermine national policy”. “While we approve and endorse the proposal for a more positive stance on green belt uses, we do wonder whether a regional approach to Green Belt is a realistic option given the importance attached to Green Belt policy at the national level”.

Examples of responses:

Option 1: Develop a Regionally Specific Green Belt Policy:

- There is support for Option 1 providing that it complements and does not undermine PPG2 objectives. It is imperative that Green Belts do not become 'Green Deserts' and they are actively used for low intensity uses to support wider Urban Renaissance objectives and recreation, health and nature conservation, which improves the quality of life for urban residents. (WM Planning & Transportation Sub-Committee)
- Option 1 will allow for the identification of more positive uses through green infrastructure studies, such as improved access and recreation; to reflect the varying needs of people and wildlife. (Nuneaton and Bedworth Borough Council)
- It would also enable policy to reflect the different characteristics of Green Belt in the city particularly the role of wedges. (Warwickshire County Council).
- The RSS needs to review the geographical area of the Green Belt as part of its comprehensive approach to the sub regional location of housing growth and to develop distinctive sub regional specific policies related to anticipated pressures, its function, protection and management. This would generate in at least some areas alternative options about how pressure would be managed and the mitigating factors to be taken into account. (Telford & Wrekin Council)
- The South Worcestershire Authorities would re-iterate our WMRSS Phase 2 partial review response which stated that neither the Phase 2 partial review or the current Phase 3 partial review, provide for the possible extension of the Green Belt. The South Worcestershire Authorities have repeatedly stated that, subject to detailed assessment, there could be a strong case for the possible extension of the Green Belt at Worcester. As it stands the Phase 3 partial review simply addresses the management of the Green Belt as opposed to its definition and extent.... the South Worcestershire Authorities consider the lack of any references to the possible extension of the Green Belt represents a significant omission in the review process and we object accordingly. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response)
- Natural England supported the technical work 'Examination of Positive Uses of the West Midlands Green Belt' We therefore support the idea of more explicit policy guidance to secure positive uses and environmental improvement in the Green Belt. However, we have one reservation - the issues and possible solutions identified in the report apply equally to much of the land around towns that is not designated as Green Belt, but is still 'the urban fringe' in the widest sense. The proposed QE4 Green Infrastructure policy is particularly relevant and we feel that the final combination of policies needs further discussion. (Natural England).

Option 2: Apply PPG2:

- Any proposals involving Green Belt land is currently dealt with in accordance with national policy in PPG2 which is considered satisfactory. (North Staffordshire Regeneration Partnership)
- Policy as it applies to land designated as Green Belt is clearly set out in PPG2. It is questionable as to why there is a need to provide further guidance in the context of those areas in the West Midlands subject to this status. More so, the approach being advocated of encouraging 'positive' uses does not sit comfortably with the purpose and function of Green Belt land. (Lichfield District Council)
- National policy can be related to the local level through the environmental enhancement policies without

the need for a specific Green Belt policy. (National Trust).

- Option 1 could potentially lead to proposals taking place within the Green Belt as part of "positive use and improvements" proposals which could potentially have a damaging impact on preserving the openness, landscape quality and setting, informal recreational role (e.g. safeguarding unrestricted public access) and nature conservation interest of the Green Belt. National planning guidance set out in PPG2 already provides sufficient guidance on this issue. (Dudley MBC)
- We would question why should just the Green Belt be singled out for improvements? Why not elsewhere? Any policy identifying specific areas would be inappropriate at RSS level and more suited to inclusion within Local Development Frameworks....It is recognised that there may be a valid case for a policy relating to improvements to the urban fringe, but this would be better addressed through revised QE policies. (Worcestershire CC).
- 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...the weakening of Green Belt policy in these areas could potentially encourage development which may harm the urban renaissance aims of the RSS. (Bromsgrove District Council)
- It is considered that existing Planning Policy Statement 2 provides sufficient guidance on such matters and that there is no necessity to develop regional policy which may only serve to undermine the principles of national Green Belt policy. The positive enhancement of Green Belt and urban fringe areas can, in any event, be achieved through other policies. (Staffordshire Moorlands District Council)
- A regionally specific policy could lead to changes occurring in certain locations within the Green Belt which could have a detrimental effect overall to preserving the openness of the Green Belt. Proposals for a Green Belt policy would have to add value / distinctiveness from a regional perspective. The reality is that multifunctional, positive uses of the Green Belt are already encouraged and implemented through PPG2. Furthermore, major issues concerning Green Belt releases (to secure positive uses and improvements rather than a review of the boundary) should have been addressed through Phase 2. (Walsall Council)

No option ticked but written response given:

- We do not consider that the development of a regional policy concerning the Green Belt will add any value to existing guidance given in PPG2. We would however comment that PPG2 was published 12 years ago and that perhaps a review of this document at a national level is a more appropriate approach. (Shropshire Council)
- While we approve and endorse the proposal for a more positive stance on Green Belt uses, we do wonder whether a regional approach to Green Belt is a realistic option given the importance attached to this policy at the national level. (WM RTPI)
- The debate at the Phase 2 EiP highlighted a number of issues regarding Green Belt. If the Panel recommends additional levels of housing it is possible that there could be implications for the Green Belt in addition to those already identified in the Preferred Option. The debate highlighted a need to clarify the role of the Green Belt and review whether it is sufficiently robust for the long term. It may be appropriate to broaden the scope of work on Green Belt to feed into the Single Regional Strategy (SRS). Developing a long-term view of the role, function and extent of the Green Belt in the region would ensure it is robust for a considerable period. (GOWM)

6 MINERALS

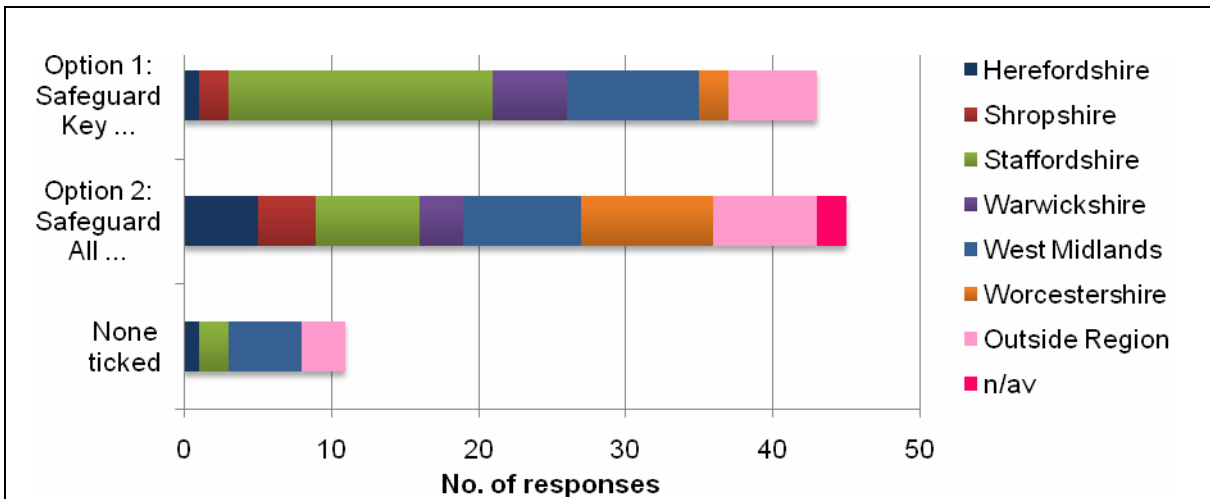
6.1 OVERVIEW

- Opinions are evenly balanced for many of the safeguarding questions. There is no clear consensus on the overall approach to safeguarding, on whether a different approach is needed in urban and rural areas, and on whether coal and Etruria Marl should be safeguarded at regional level. However, a majority was in favour of safeguarding in designated areas, and for safeguarding infrastructure particularly relating to secondary materials and sustainable transport infrastructure for all minerals.
- The suggested aggregates apportionment is not considered realistic. There was a considerable body of opinion which felt that the apportionment is too high for Staffordshire, and some were of the view that it is too high for the region as a whole. Most of those responding supported an apportionment using different sub-regions and methods, although there is some resistance to using the sub-regions proposed by the Section 4(4) authorities.
- A majority of respondents felt that applying brick clay supply requirements to individual brickworks is the most sustainable way of meeting future needs, and all the suggested locational criteria were supported. However, there was no consensus on whether the shortfall in clay supplies can be met from within region, and few suggestions for policies on stockpiling Etruria Marl and fireclays.
- Throughout the minerals section, there were frequent references to issues of compliance with national planning policy, and the need for and role of regional policy often questioned. Thirty two respondents made references to national minerals planning policy, of which 53% were from local authorities at all levels from county and unitary to district/borough and town council level, and 22% from industry. The remainder were from a variety of other organisations.

6.2 SAFEGUARDING

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?

Organisations:	Option 1 - Safeguard Key Minerals and Infrastructure	%	Option 2 - Safeguard All Minerals and Key Infrastructure	%	No option ticked but response	%	Total responses
LA - County or Unitary	12	12%	4	4%	3	3%	19
LA - District	8	8%	4	4%	2	2%	14
Parish Council	5	5%	10	10%	2	2%	16
NDGB	3	3%	2	2%	1	1%	6
SEEP	6	6%	15	15%	1	1%	22
Business	6	6%	6	6%	2	2%	14
Individual	3	3%	5	5%	0	0%	8
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	43	43%	45	45%	11	11%	99



Opinion was evenly split between whether to safeguard only key minerals and infrastructure, or whether to safeguard all minerals and key infrastructure.

Of those supporting safeguarding of all minerals, the principal reasons given were that this takes account of the fact that it is difficult to predict future requirements, and gives flexibility to respond to the changing value and importance of minerals in the longer term. Supporters of this position also noted that it would not necessarily mean that safeguarded resources are in fact extracted.

- Should recognise the constraints from uneconomic extraction, sterilisation of alternative beneficial uses and any potential opportunities for enhancement of biodiversity value. (Malvern Hills DC, Worcester CC and Wychavon DC - Joint Response)
- An approach based only upon those identified as essential to the construction process is not in conformity with the advice in MPS1, the MPS1 Practice Guide, or the content of A Guide to Mineral Safeguarding in England. (The Coal Authority)

Those who felt that only key minerals and infrastructure should be safeguarded felt that development may be unnecessarily restricted, and that local safeguarding is adequate for some minerals. There were also many references to inconsistency with national planning policy, in support of both points of view.

- The RSS should do no more than provide a high level policy statement/framework against which the planning authorities in the region would produce local policies and define the areas to be safeguarded. (Ennstone Johnston Ltd)
- Some mineral resources, e.g. cement, silica sand and coal, are the subject of national planning policy guidance and, thus, are safeguarded under related policy statements. It is considered unnecessarily repetitive to include a regional policy on these mineral resources. (West Midlands RTPI)
- An RSS is insufficiently 'fine grained' to be able to accurately safeguard all minerals and key infrastructure in the Region. (CEMEX UK Operations Ltd)

Of the other comments made, a number of suggestions were made for minerals which should be safeguarded, specifically silica sand, cement making materials, gypsum, shale, coal, building stone and other traditional construction minerals. Other comments included:

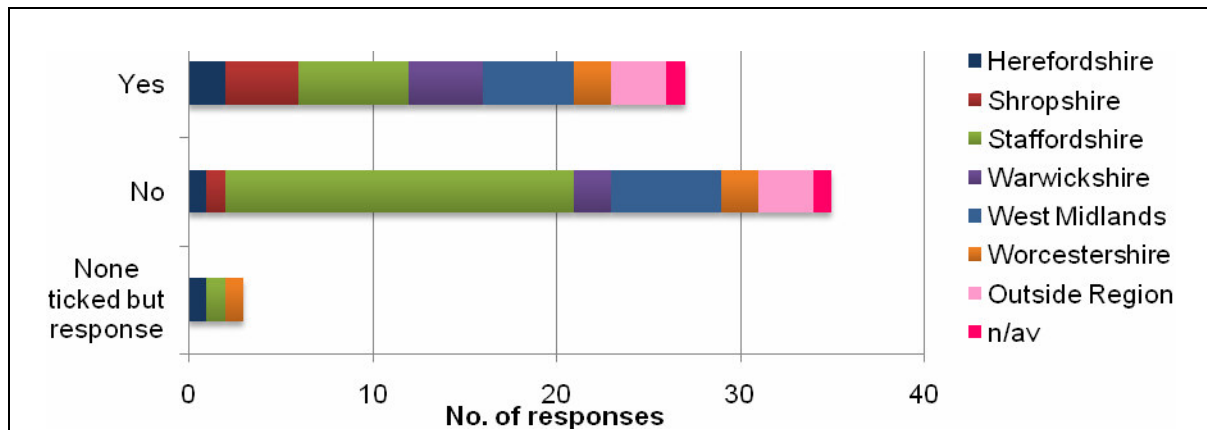
- Description of 'Key minerals' is too restrictive since it does not include minerals essential for economic growth and infrastructure - eg. minerals used in construction, energy production and manufacturing of materials for industry. (Tarmac)
- The approach consulted upon here is too narrow in its focus, it should have considered a third option, not to safeguard any minerals within the RSS. MPS1 does not identify any specific role for the RPB or the RSS to include policies on mineral safeguarding and as such any regional policy may only lead to the

unnecessary duplication of the National Policy Objective. (The Coal Authority)

- In most cases, it will be the local mineral planning authorities that will advise on safeguarding important mineral resources from built development but in terms of ensuring a consistent approach to mineral safeguarding across the region (particularly those minerals used for construction purposes such as sand & gravel and clay) it is considered that there is a need for a regional overview. This will contribute to ensuring that there are options for potential future working of these important minerals in the long term. (Staffordshire County Council)
- In a few cases, minerals may be nationally important, rather than merely regionally. (Mineral Products Association Ltd)

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total responses
LA - County or Unitary	5	8%	9	14%	1	2%	15
LA - District	3	5%	6	9%	1	2%	10
Parish Council	4	6%	9	14%	1	2%	14
NDGB	1	2%	1	2%	0	0%	2
SEEP	8	12%	6	9%	0	0%	14
Business	2	3%	2	3%	0	0%	4
Individual	4	6%	3	5%	0	0%	7
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	27	41%	36	55%	3	5%	66

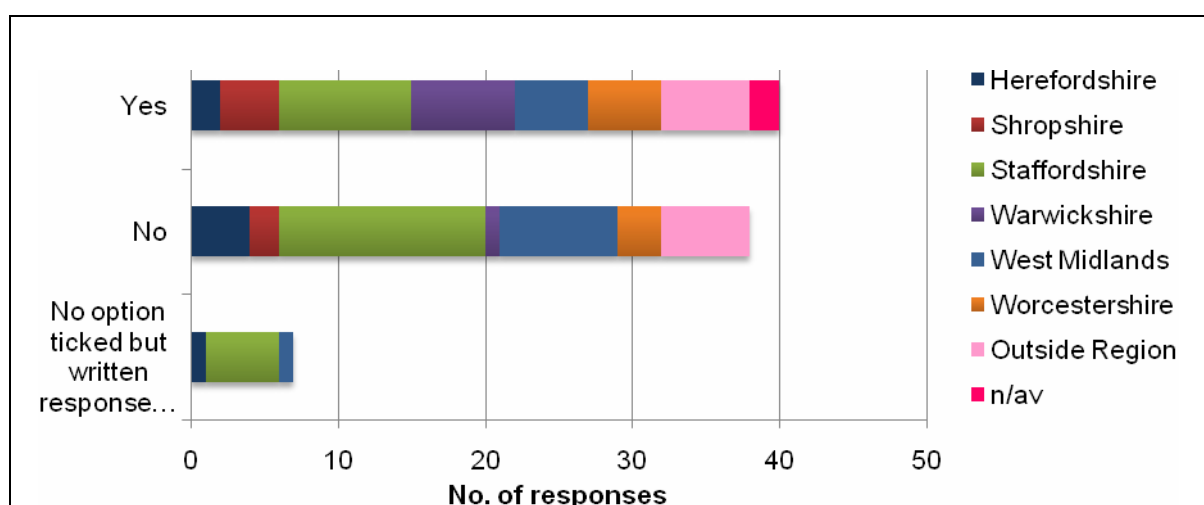


There was a slight balance of opinion against designating a specific regional safeguarding area for Etruria Marl. The most common view expressed was that this can be adequately dealt with at local level. However, those in support generally felt that this is a nationally important mineral and therefore the RSS needs to ensure effective safeguarding. Other comments included the view that the same approach should apply to all minerals, in support of both positions.

- The broad extent of this resource will be mapped as a Mineral Safeguarding Area (MSA) at a sub-regional and local level. This is adequate and there is no need for a regional policy. (Dudley MBC)
- As the West Midlands is the principal source of supply of Etruria Marl, it is incumbent on the regional authority to ensure that effective policies for its safeguarding are implemented throughout the region. (British Ceramic Federation)

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total responses
LA - County or Unitary	6	7%	5	6%	4	5%	15
LA - District	4	5%	7	8%	1	1%	12
Parish Council	9	10%	7	8%	1	1%	17
NDGB	0	0%	2	2%	0	0%	2
SEEP	8	9%	10	13%	0	0%	19
Business	6	7%	4	5%	1	1%	11
Individual	7	8%	3	3%	0	0%	10
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	40	47%	38	45%	7	8%	86



Opinion is evenly split on whether there is a need for a different approach to safeguarding in urban compared to rural areas. Those in support of a different approach felt that methods of working, effects on residents and restoration costs can be different in rural and urban areas, and to have the same approach may unnecessarily restrict urban development. Other comments included:

- In urban areas the restrictions on development to protect mineral resources could be treated differently with more of a presumption in favour of development provided the mineral is extracted first. In rural areas the priority should be to continue the current land use as long as possible and, where stocks are used, to reinstate and landscape the site as quickly as possible afterwards. (CPRE)
- Greater emphasis on prior working in urban areas to avoid environmental damage and transport impacts which would otherwise derive from having to work mineral in more distant rural areas. (Shropshire Council)

Those against a different approach felt that it is a matter for the local level, and that the difference should be in how the policy is applied at local level and not in how safeguarding is done.

- In determining safeguarding areas the geological resource must be the starting point, this is the appropriate evidence base and as such there should be no difference to defining to MSAs in urban or rural areas. The difference that will probably be appropriate relates to how that policy is then implemented through policies relating to issues such as prior extraction and the delineation of Mineral Consultation Areas (MCAs). (The Coal Authority)

Question M4: What should the threshold for development be when consulting on non mineral developments in Minerals Safeguarding Areas (MSAs) / Mineral Consultation Areas (MCAs)?

There was no clear consensus on thresholds for development. Some respondents felt that all listed thresholds should be used, and some that all relevant issues should be considered including location, end use, size and mineral type/scarcity. Others felt that thresholds could not be defined, either because there was insufficient evidence, or because even small developments could sterilise a resource, or because conditions will vary across the region. Comments included:

- There is no appropriate threshold as even a small development in the centre of an economically valuable reserve could sterilise the entire reserve. Consultation should therefore apply in all cases. (Confederation of UK Coal Producers (CoalPro))
- A blanket approach would not reflect all the varied spatial and mineral specific considerations that should influence the adoption of any thresholds chosen (The Coal Authority)
- There is a case for setting thresholds in the RSS for regional conformity consultations linked to the regional MSAs, so that Mineral Planning Authorities (MPAs) will know which applications they should refer to the Regional Conformity Panel. If there are also to be thresholds in the RSS linked to MCAs and/or MSAs, we think they should be set at a very high level (e.g. sites of 10 hectares or more), so that all MPAs will be capable of implementing them. (Walsall Council)

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

Of the 56 respondents replying to this question, 46% supported safeguarding of sustainable transport infrastructure and 29% supported safeguarding infrastructure related to secondary materials. Examples of comments are:

- Regional policy should recognise the need to safeguard strategic transport infrastructure for bulk freight which could facilitate sustainable transport of minerals. In addition, the region should recognise the need to safeguard waste management facilities capable of producing recycled aggregate. (Staffordshire County Council)
- To minimise energy use, safeguard sites for transport and processing near the arisings. (Member of WM Regional Sustainability Forum)
- Agree in principle, but not sure that 'safeguarding' in the minerals resource sense can be successfully applied. (FTMINS)
- Facilities such as concrete batching plants, concrete products plants and coated stone plants are effectively manufacturing facilities that should be afforded no more protection than other employment uses. (Higham & Co for Nurton Developments Ltd)

In terms of what mechanisms should be used to safeguard such sites and facilities, buffer zones or consultation zones were generally supported, although some felt buffers were inappropriate or unworkable and there was some feeling that it should be left to lower tiers of planning to determine.

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

Organisations:	Safeguard	%	Do not safeguard	%	No option ticked but response	%	Total responses
LA - County or Unitary	11	13%	4	5%	0	0%	15
LA - District	8	9%	2	2%	2	2%	12
Parish Council	14	16%	1	1%	0	0%	15
NDGB	3	3%	3	3%	0	0%	6
SEEP	13	15%	7	8%	2	2%	22
Business	10	11%	0	0%	0	0%	10
Individual	4	5%	4	5%	0	0%	8
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	63	72%	21	24%	4	5%	88

Three quarters of respondents felt that minerals should be safeguarded in designated areas. Common views were that some extraction can be sustainable in designated areas if carefully managed, and other policies relevant to protecting the designated area will provide protection.

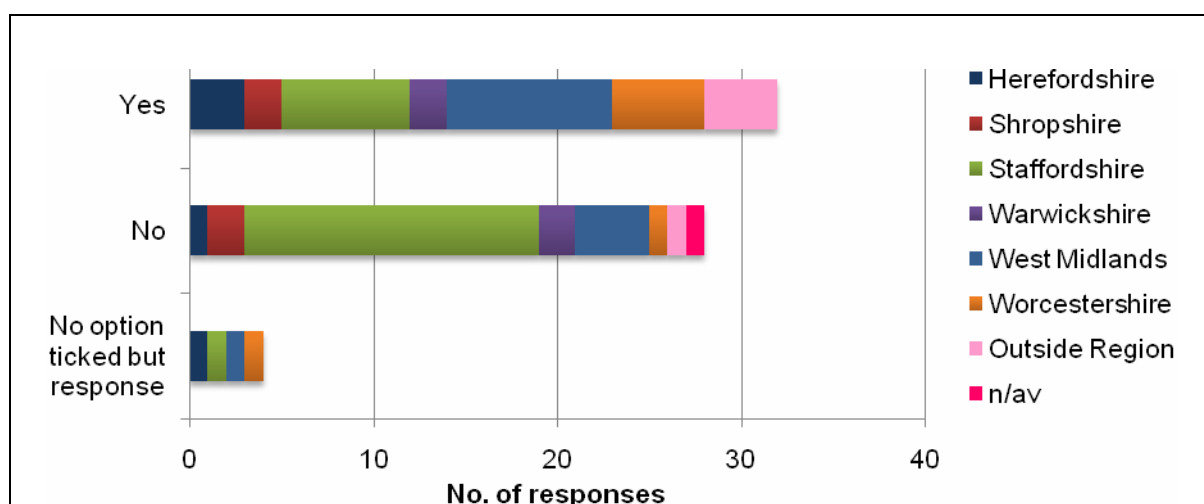
- Safeguarding mineral resources does not necessarily imply working of these minerals within a foreseeable time frame. Minerals are mostly sterilised by other forms of development. This is less likely within a designated area, but if anything the safeguarding of minerals may reduce the threat to the designated area from other forms of development. (Cotswolds Conservation Board)
- Many landscape designations exist because of their geology and hence represent a potential resource, which may be needed in future. The alternative is to risk sterilising scarce resources without thought. As a corollary regional policy must emphasise that safeguarding does not automatically mean extraction, only that the issues will be properly considered. (Worcestershire County Council)
- The unique character of many of the region’s landscapes and townscapes is dependent on the availability of local materials and their safeguarding for the future. We suggest that a region-wide approach to safeguarding natural building and roofing stone is necessary covering all areas. (English Heritage)
- There needs to be flexibility based on the specific circumstances in each case – some quarries are SSSIs in themselves and can enhance archaeological/geological value. (Herefordshire Council)
- This is to ensure meeting national policy in MPS1. The key is there are no no-go areas. Restricting minerals extraction in designated areas could put unnecessary pressure on W Midlands to supply increased levels. (British Aggregates Association)
- Some mineral resources can be worked (e.g. at a small scale) without adverse impact. (Shropshire Council)
- MPS1 and its accompanying Practice Guide does not indicate that any difference of approach should be pursued in areas subject to national designations. (The Coal Authority)

However, a quarter of those responding felt that minerals should not be safeguarded in designated areas, mainly because of a perceived need to fully protect nature and heritage.

- Natural England would not be in favour of minerals safeguarding areas in designated areas, because of the implication that extraction will occur in the future. (Natural England)
- In the main, major mineral developments would not ordinarily be permitted at such national designated sites – it follows therefore that mineral resources should not ordinarily be safeguarded. (Dudley MBC)
- The RSS review has to be compatible with national planning guidance. Major mineral extraction should not take place in AONBs except in exceptional circumstances. (Telford & Wrekin Council)

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total responses
LA - County or Unitary	5	8%	10	16%	1	2%	16
LA - District	2	3%	7	11%	2	3%	11
Parish Council	6	9%	6	9%	0	0%	12
NDGB	0	0%	1	2%	0	0%	1
SEEP	14	22%	2	3%	1	2%	17
Business	2	3%	0	0%	0	0%	2
Individual	5	8%	2	3%	0	0%	7
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	32	50%	28	44%	4	6%	64



There is no clear consensus on whether there is a need for a regional policy on safeguarding coal. Of those local authorities that responded to this question, the majority did not feel that there was a need for a coal safeguarding policy. Those in support felt that coal-fired power stations are an option for the future, so shallow reserves should be safeguarded. It was also noted that fireclay is generally found in conjunction with coal resources, and that any policy on safeguarding fireclay resources must therefore apply equally to shallow coal resources. Other respondents were of the view that, provided that the Regional Assembly is convinced that the coal deposit constitutes a resource, it must be included within an MSA in compliance with MPS1.

- Resource needs to be protected until future use of coal/technology issues are clear. (Worcester Civic Society)
- The RSS fails to recognise the future role for coal which the Government set out in the Department of Energy and Climate Change Press Release of the 17 June 2009, which recognises that some 37% of the UK's Electricity Generation comes from coal, and that the new clean coal technologies are expected to support up to 60,000 UK jobs. (The Coal Authority)
- The Staffordshire and Warwickshire coal fields are one of this region's greatest natural resources and there are real opportunities to be gained from the coal fields. In particular, we propose that a regional safeguarding policy on coal is included for the sake of ensuring much needed energy supplies that may be required during the lifespan of the RSS. The workings can also be regarded as a resource in terms of waste disposal capacity. (West Midlands Business Council)

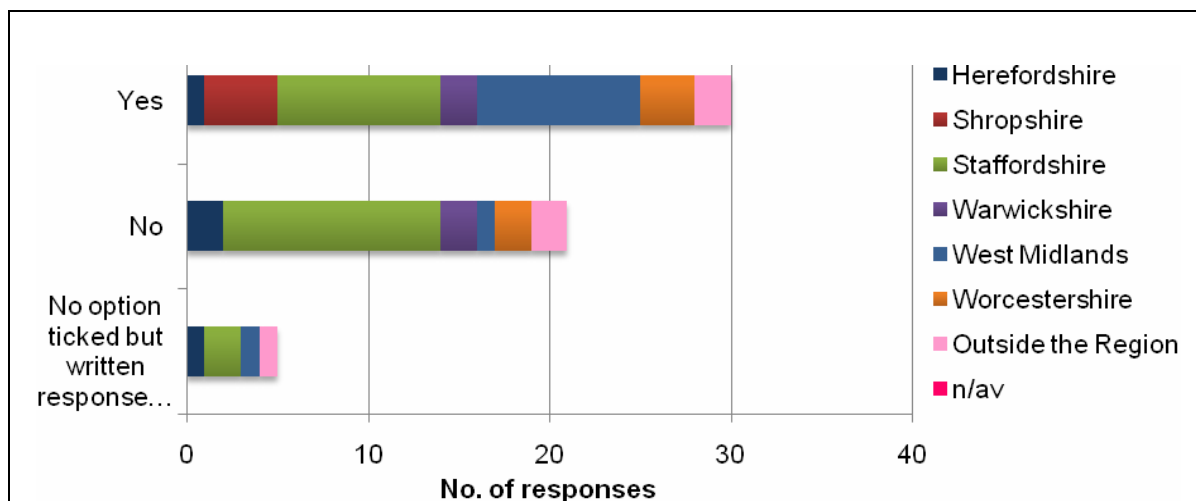
Those against the safeguarding of coal generally felt that no evidence is available at the present time of the economic importance in the foreseeable future of coal to the region.

- This will be addressed by MPA's in response to MPS1 / MPG3 or any replacement guidance. (Shropshire Council)
- It would not be practical to safeguard the whole of the concealed coalfields...surface coal resources are on the coal consultation maps and the Coal Authority can make representations where they consider that valuable coal resources are threatened by other forms of development... no requirement to maintain landbanks for energy minerals and a lot of coal consumed in the UK is imported. (Telford & Wrekin Council)

Other comments included a reference to the carbon implications and that this should be linked to climate change and renewables policies.

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?

Organisations:	Yes	%	No	%	No option ticked but response	%	Total responses
LA - County or Unitary	4	7%	9	16%	2	4%	15
LA - District	8	14%	1	2%	1	2%	10
Parish Council	4	7%	7	12%	0	0%	11
NDGB	1	2%	0	0%	0	0%	1
SEEP	8	16%	2	4%	2	4%	12
Business	0	0%	1	2%	0	0%	1
Individual	5	9%	1	2%	0	0%	6
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	30	54%	21	37%	5	9%	56



A majority of respondents (54%) supported the suggestion of greater emphasis on existing technologies to release energy from coal. Examples of views in support included:

- Exploitation of coal bed methane has potential, but underground coal gasification (UCG) faces a number of technical issues; carbon capture and storage (CCS) from mined coal may be a way forward if costs can be mitigated. (British Geological Survey)
- There is much work on methane extraction and this needs greater investigation. As such methane leaking from coal seams has a far greater greenhouse gas component than carbon dioxide. Thus there are a number of gains to be made from utilisation of this resource. (Friends of the Earth (FOE) West Midlands)
- This would reflect the ever-changing energy market and would help to set out a strategic policy context in areas where formal national planning policy has yet to catch up. (The Coal Authority)
- There are commercial opportunities for the coalfields for coal seams that are unminable, in terms of

carbon sequestration... this process displaces methane which can be recovered as an energy source and sold to offset costs. We would therefore encourage the West Midlands Regional Assembly to allow the development of this sector ... especially in terms of developing the correct planning regime (West Midlands Business Council)

However, those not in support sometimes felt that there is no need for regional policy and that it may be prejudicial to second-guess national policy.

- Beyond the national policy provided in Annex 4 to Mineral Planning Statement 1, it is considered that there is no requirement for regional policy relating to this matter at this stage. (Staffordshire County Council)
- The existing RSS Policy M4 is sufficient and an additional regionally specific policy for coal mining is not necessary. (South Staffs Council)

Respondents also felt that there are commercial opportunities within the coalfields for coal seams that currently cannot be mined using conventional methods, and that new technologies may make deposits economical and technologically viable in future.

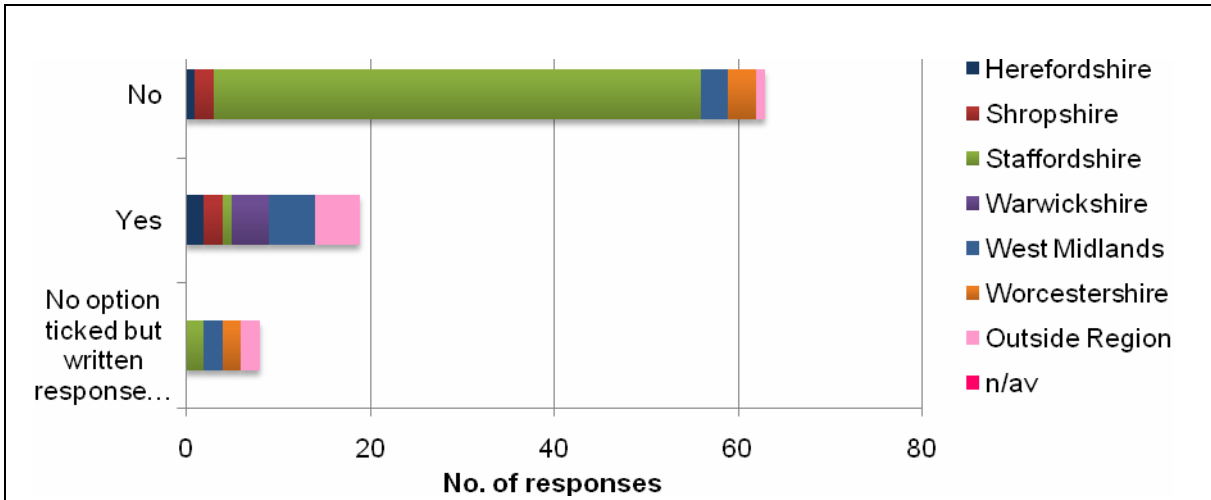
Other matters which an updated policy M4 could address include:

- Large scale operations integrated with rail systems
- Restoration of mineral sites including their potential for leisure, tourist, educational, health, sport, cultural and biodiversity/conservation opportunities.
- Protection and improvement of geodiversity features and inclusion of policies requiring restoration.

6.3 FUTURE SUPPLIES OF CONSTRUCTION AGGREGATES

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total responses
LA - County or Unitary	6	7%	11	12%	3	3%	20
LA - District	1	1%	9	10%	1	1%	11
Parish Council	1	1%	9	10%	1	1%	11
NDGB	0	0%	0	0%	1	1%	1
SEEP	3	3%	6	7%	2	2%	11
Business	7	8%	0	0%	0	0%	7
Individual	1	1%	28	31%	0	0%	29
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	19	21%	63	70%	8	9%	90



A large majority of respondents held the view that the apportionment set out in the consultation document is not realistic. The support for this view is particularly notable among individuals. A significant body of opinion was that Staffordshire’s allocation is too high, and some feeling also that the regional figure is too high. A number of respondents called for a comprehensive regional assessment of aggregate supply options before new sub-regional apportionments are decided. This should take account of growth projections, the impact of the Code for Sustainable Homes and increasing use of secondary aggregates.

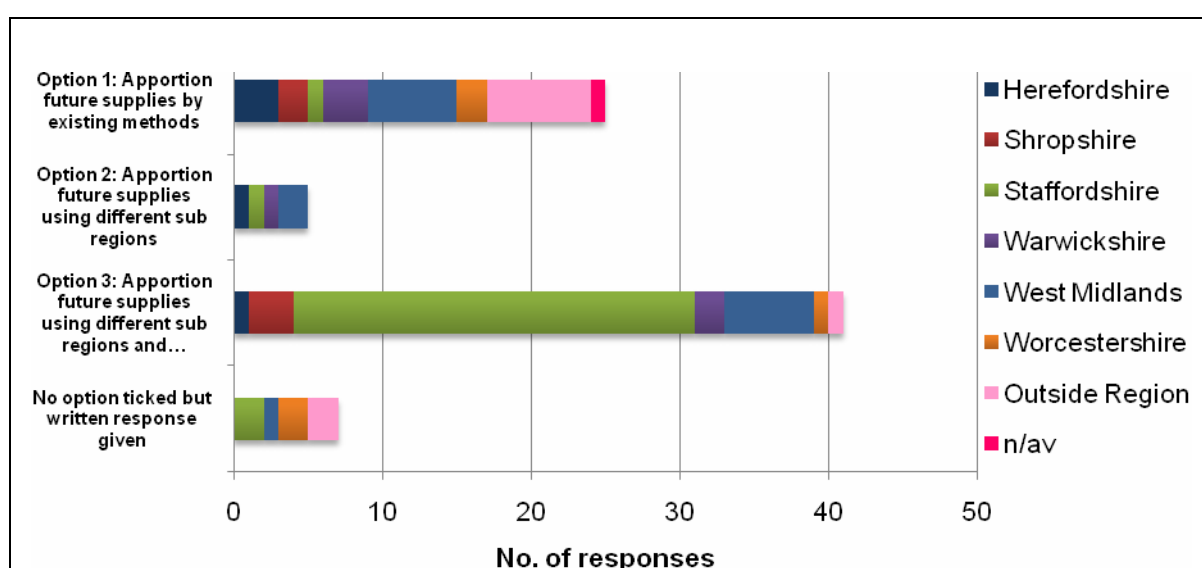
- In terms of sustainability of both the demand for and use of resources, a more fair and equitable distribution of mineral extraction and sourcing should apply than the current reliance on Staffordshire. (Lichfield District Council)

Other comments included a need for better data, particularly on future use of recycled aggregates, and the need for a cross-boundary approach in relation to the Peak District National Park.

- Higher levels of allocation ought to be maintained within North Staffordshire because of existing reserves, existing labour and infrastructure, rail connections to sites and local regeneration/construction needs. (Madeley Aggregates Limited)
- Any review of these figures should also consider the areas of major growth and their proximity to appropriate mineral resources to reduce haulage. The current apportionment figures are largely based on historic production rates and not necessarily where the areas of major development will be. (Environment Agency).

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?

Organisations:	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	%	No option ticked but response	%	Total responses
LA - County or Unitary	5	6%	1	1%	10	13%	4	5%	20
LA - District	3	4%	1	1%	8	10%	2	3%	14
Parish Council	4	5%	2	3%	7	9%	0	0%	13
NDGB	0	0%	0	0%	3	4%	0	0%	3
SEEP	4	5%	1	1%	8	10%	2	3%	15
Business	8	10%	0	0%	5	6%	0	0%	13
Individual	1	1%	0	0%	0	0%	0	0%	1
Individual - G&T	0	0%	0	0%	0	0%	0	0%	0
TOTAL	25	32%	5	6%	41	52%	8	10%	79



Most support was given to Option 3, apportioning using different sub-regions and methods. Option 1 on existing methods had less support, and option 2 using different sub-regions had very little support. Comments were generally that an alternative method is required to provide realistic and sustainable solutions to aggregate supply in the region, taking account of future patterns of growth. However, it was also felt that the existing system (option 1) is proven whereas others are not and will be difficult to bring forward and secure agreement.

Examples of comments in support of Option 1:

- Any alternative must offer clear benefits compared to Option 1, and at present there is insufficient information on any other option to come to this conclusion. (CEMEX UK Operations Ltd)
- The suggested alternatives will result in a level of calculation and sophisticated interpretation that may not be easy to bring forward or secure agreement with the regional local authorities. It will also be out of line with national policy and the policies of neighbouring regions. (West Midlands RTP)

Examples of comments in support of Option 3:

- An alternative method is required to provide realistic and sustainable solutions to aggregate supply in the region, taking account of future patterns of growth. (Staffordshire County Council)
- Principles of sustainability and fairness should apply in Identifying locations and scales of supply of

aggregates - proximity to the location of new development and the environmental and other impacts including of bulk road transport. (Lichfield District Council)

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?

A number of suggestions were made for policy guidance to reduce reliance on primary aggregates. These included:

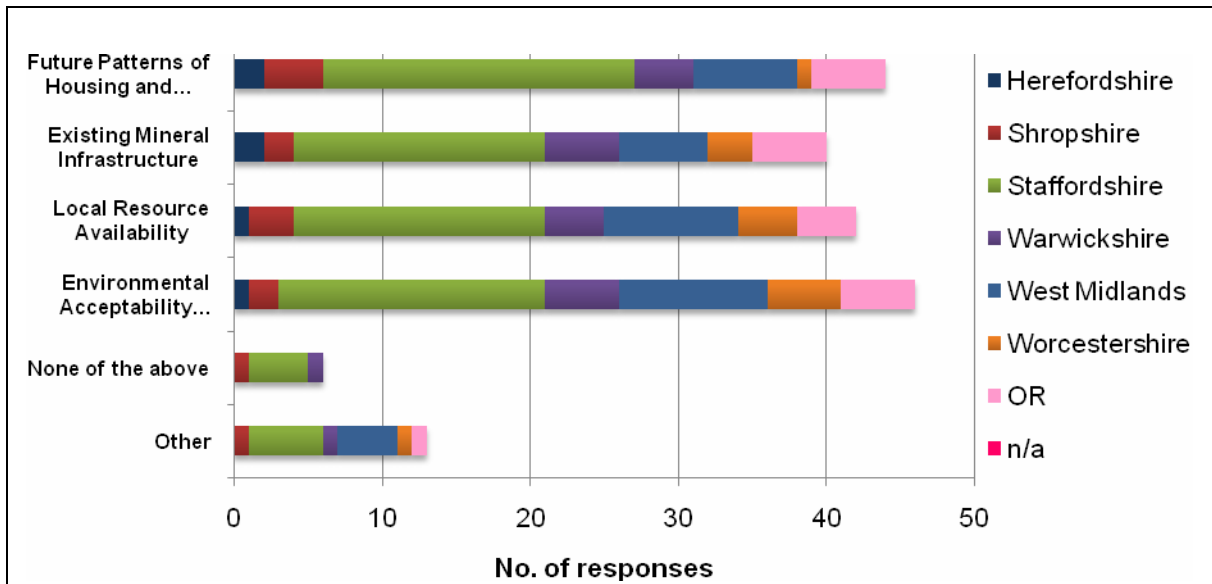
- Encourage onsite recycling
- Use of recycled materials in construction
- Promote Site Waste Management Plans
- Promote sustainable construction and the Code for Sustainable Homes
- Improve data
- Set targets for local authorities for alternative aggregates
- Should be covered in policies on sustainable resource use and waste, rather than minerals.

However, it was also felt that regional planning policy has little control over the issue, and that there is adequate national guidance, policy and fiscal measures, and that the issue is adequately covered by existing policy M3. Examples of other comments included:

- This is a sustainable resource issue which should be covered in policies towards sustainable construction and design, rather than policies towards minerals. (Walsall Council)
- Set targets for local authorities to contribute to the regional target of 100 million tonnes of alternative aggregates to be produced 2005 – 2020 (particularly in the major urban areas of the region). (Staffordshire County Council)
- The use of alternative aggregates is not an appropriate issue to be tackled by the RSS as the Town & Country Planning system has little or no control over how or which aggregates are consumed by the development which it regulates. (CEMEX UK Operations Ltd)
- A more thorough evidential regional study of the impact of recycling on demand, including how recycling can be stimulated through partnership working with the aggregate producers and the construction industry. (Coalition of Villages West of A38 in East Staffordshire)

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

Organisations:	Future patterns of growth	Existing mineral infrastructure	Local resource availability	Environmental acceptability	None	Other
LA - County or Unitary	10	11	12	11	3	5
LA - District	6	6	5	6	1	1
Parish Council	10	8	9	7	1	1
NDGB	2	2	2	4	0	3
SEEP	6	5	6	9	0	2
Business	5	5	5	4	0	0
Individual	5	3	3	5	1	1
Individual - G&T	0	0	0	0	0	0
TOTAL	44	40	42	46	6	13



There was fairly balanced support for each of the factors for determining future supplies of aggregates in the region, with most of those responding supporting all. Other suggested factors to consider included:

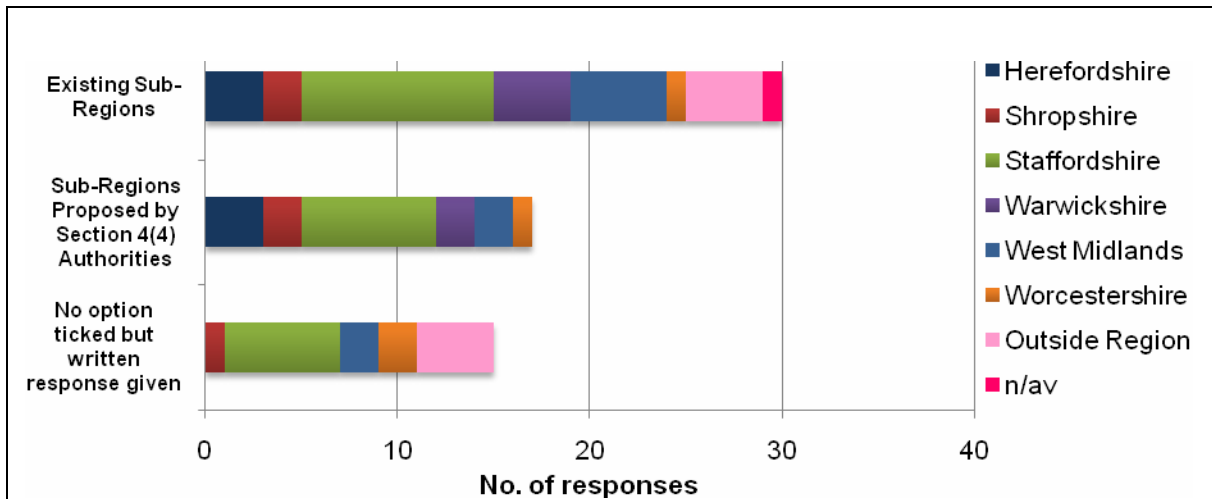
- Sustainable transport;
- Opportunities from restoration and afteruse;
- Cumulative impacts affecting local communities;
- Recycling levels.

Other comments:

- The current proposals do not make any link between policies QE7, QE9, ENV12 and ENV17 which indicate ways in which mineral working can have positive landscape, ecological, scientific and flood management benefits. These concepts could be used to direct mineral working into far more beneficial policy and geographical areas than simply providing an (albeit essential) source of raw material for the economy. (Worcestershire County Council)
- The sub regional apportionments should be subject to sustainability appraisal as per national policy and guidance. (Staffordshire County Council)

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?

Organisations:	Existing sub-regions	%	Sub-regions proposed by s4(4) authorities	%	No option ticked but response	%	Total responses
LA - County or Unitary	9	15%	3	5%	3	5%	15
LA - District	4	6%	3	5%	4	6%	11
Parish Council	5	8%	6	10%	2	3%	13
NDGB	0	0%	0	0%	1	2%	1
SEEP	3	5%	1	2%	2	3%	6
Business	6	10%	1	2%	2	3%	9
Individual	3	5%	3	5%	1	2%	7
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	30	48%	17	27%	15	24%	62



Almost half of respondents felt that the existing sub-regions should be used. It was felt that the existing method is tried and tested, works in practice and provides consistency.

- We would like to see the methodology behind the way all the sub-regions have been identified. The methodology should be set out in the RSS document so that the general public, the industry and MPA's can adequately assess the reasoning and justification prior to making a decision. (Warwickshire County Council)
- More evidence is required before new sub-regional areas are defined. For example, an assessment is required relating to the potential capacity to produce aggregates within the former West Midlands County area and then to establish the most sustainable options by which that provision can be replaced if necessary. (Staffordshire County Council)

However, a quarter of respondents felt that the Section 4(4) Authority proposals should be used, although interestingly this did not appear to have particular support among the counties and unitaries. New sub-regions were supported because they are thought to provide for needs where they arise and would help to address equity and sustainability issues.

- Seems to provide a better balance between availability and transport. (Wootton Wawen Parish Council)
- Existing sub reasons are simply the easy option. The pain of future extraction should be proportional to the areas developed. (Individual)
- Do not agree that a sub-region comprising Staffordshire, Stoke-on-Trent and Walsall would be preferable. There is a much better case for the Black Country to be a sub-region in its own right. (Walsall Council)

At first sight the balance of responses to this question would appear to be contradictory to the responses to question M10 on options for apportioning future aggregate supply which favoured using new sub-regions. However, where respondents support option 3 but also favour using existing sub-regions in response to question M13, the accompanying comments indicate that there is felt to be insufficient justification as yet for the Section 4(4) proposals.

- More evidence is required before new sub regional areas are defined. For example, an assessment is required relating to the potential capacity to produce aggregates within the former West Midlands County area and then to establish the most sustainable options by which that provision can be replaced if necessary. (Staffordshire County Council)
- Before this is done, we'd like to see more certainty in demand /supply information to ensure that arbitrary administrative devices don't hamper innovation from the private sector. (Coalition of Villages West of A38 in East Staffordshire).

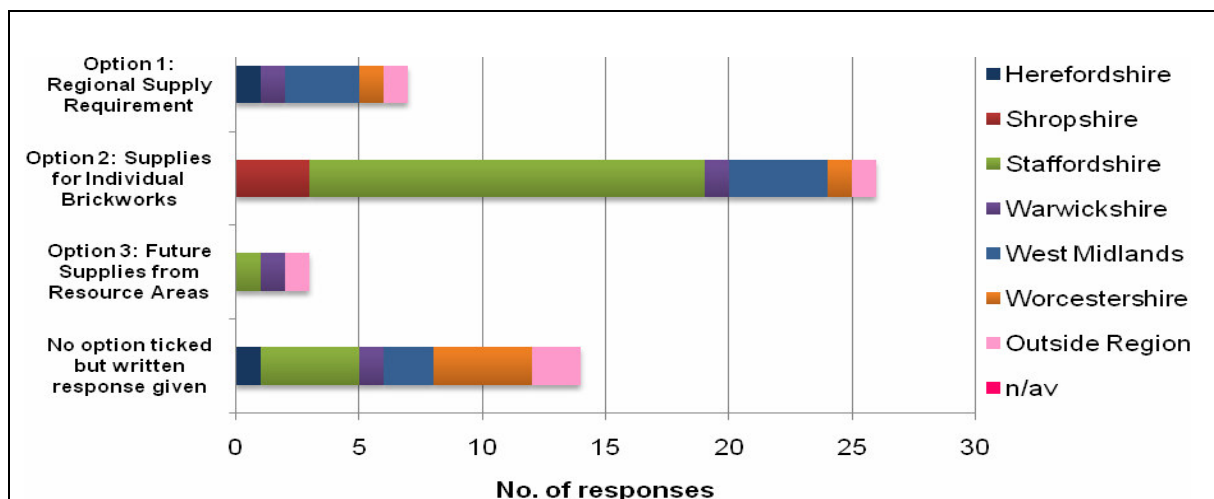
Question M14: What policies do you think would best ensure that separate long term off site stockpiling of Etruria Marl and fireclays can be provided in the Region?

Few suggestions were given for policies to ensure separate stockpiling of Etruria Marl and fireclays, with doubts about the need and the ability to deal with it in planning policy. It was felt that more evidence is required from the industry as to whether there is a need for such facilities and if so, to establish the options for sites. Some respondents believe that the acceptability and practicality of offsite stockpiling of Etruria Marl and fireclays will depend largely on the economic viability of any such proposal, and that such considerations are generally beyond the scope of planning policy. However, a small number of suggestions were made for policy, including:

- Where there are potential future areas which have been identified by Industry, they could be safeguarded for stockpiling and storage purposes in the same way as ports, loading facilities and transport infrastructure. (Warwickshire County Council)
- Long term mineral sites may well be part of the answer to long term stockpiling of fireclays where they can't be accommodated at brickworks. (Telford & Wrekin Council)
- There should be no legal difficulty in preparing a policy that requires any Etruria Marl that is to be stockpiled to simply be handled in accordance with a binding management plan for the proper stockpiling of this rare mineral. (Madeley Aggregates Limited)
- Long term off site stockpiling should be confined to sites that are accessible by sustainable means of transport, i.e. rail and waterways. (Cannock Chase District Council)

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?

Organisation:	Option 1: Regional Supply Requirement	%	Option 2: Supplies for Individual Brickworks	%	Option 3: Future Supplies from Resource Areas	%	No option ticked	Total
LA - County or Unitary	3	6%	12	24%	0	0%	1	16
LA - District	0	0%	7	14%	0	0%	5	12
Parish Council	1	2%	6	12%	0	0%	2	9
NDGB	0	0%	0	0%	0	0%	0	0
SEEP	3	6%	1	2%	0	0%	3	7
Business	0	0%	0	0%	2	4%	2	4
Individual	0	0%	0	0%	1	2%	1	2
Individual - G&T	0	0%	0	0%	0	0%	0	0
Total	7	14%	26	52%	3	6%	14	50



There was a large degree of support for Option 2 (supplies for individual brickworks), considerably less for Option 1 (regional supply requirement) and little for Option 3 (meeting shortfall from resource areas). Option 2 was felt to be consistent with national policy, minimises transport and provides policy for the provision of clay to meet real demand i.e. maintaining supply at local brick and tile works.

Comments in support of Option 2 included:

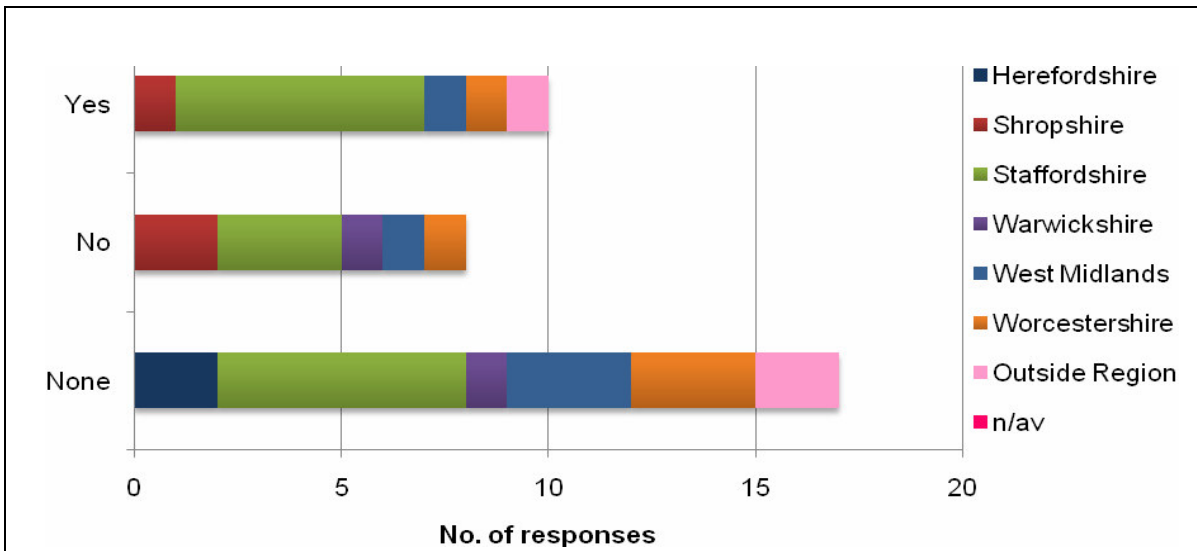
- Option 2 appears to meet the requirements of MPS1. However it should be strengthened to emphasise the requirement to cater for cross-boundary supply between MPAs within the region and in neighbouring regions wherever necessary. Other options do not comply with MPS1. (British Ceramic Federation)
- Option 2 looks the more feasible and sustainable approach in that it will reduce the mineral resource supply to a level that is actually required across the region. (Dudley MBC)

Other comments included the following:

- Regional numbers will not be adequate unless the supply and demand are balanced at a sub-regional level. We also think a phased approach is needed as we do not know how much of the demand will actually materialise. We would want to see priority to meeting the need based on environmental criteria, landscape implications and reducing the need to travel. (CPRE)
- It is important that transport infrastructure is assessed when identifying broad locations for long-term offsite stockpiles. (Highways Agency)

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

	Yes	%	No	%	No option ticked but response	%	Total responses
Organisations:							
LA - County or Unitary	3	9%	3	9%	5	14%	11
LA - District	2	6%	1	3%	6	17%	9
Parish Council	1	3%	3	9%	2	6%	6
NDGB	0	0%	0	0%	0	0%	0
SEEP	2	6%	0	0%	4	11%	6
Business	1	3%	0	0%	0	0%	1
Individual	1	3%	1	3%	0	0%	2
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	10	29%	8	23%	17	49%	35



Opinion was evenly divided as to whether the shortfall in supplies could be met from quarries within the region. Comments from those who felt that it could included the following observations:

- Any shortfalls should be met by local resources as per the national policy for brick clays (Staffordshire County Council)
- There are many quarries that are currently working inefficiently or not sufficiently profitable. (CRASH)
- There are reserves within North Staffordshire that are likely to become available as soon as they can be proven and accessed. (Madeley Aggregates Limited)
- There are substantial quantities of clay resources that flank the region’s coalfields that could also be utilised. (Telford & Wrekin Council)

Respondents who felt the shortfall could not be met from within the region made comments including the following:

- Discussions with brick manufacturers indicate that there is likely to be scope for further Etruria Marl extraction in the Black Country. However, whether or not this potential is realised will depend on suitable proposals coming forward as planning applications. Also unlikely to be capable of supplying works outside Black Country on any scale. (WM Planning & Transportation Sub-Committee)
- Given the decline in the brick making industry over the last year and the reduction in production rates this year and the lack of construction taking place in the region, it is difficult to predict whether existing brickworks will even be viable to remain open. (Warwickshire County Council)

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.

Of the 58 consultees responding to this question, most supported all the suggested criteria to identify locations for stockpiles. Others supported various combinations of some criteria.

Criteria	Number supporting	%
Proximity to brick clay supplies	35	60%
Proximity to existing brickworks	38	66%
Good access to road/rail	42	72%
Proximity to existing/future markets	35	60%
Long term accessibility	31	53%
Locations where it is possible to minimise/avoid significant environmental impacts	39	67%
Other	14	24%

Other suggested criteria included:

- Size of site
- Proximity to planned or existing residential properties, and
- Proximity to water transport

6.5 COMMENTS ON MINERALS ISSUES IN OTHER SECTIONS OF CONSULTATION

A small number of comments (from 12 respondents) were made in the Environment section of the consultation which have a bearing on minerals issues.

Most comments related to the restoration of minerals sites, with some welcoming the recognition for example in policies QE6 and QE7 of the benefits that restoration can bring for landscape and biodiversity enhancement. Others called for greater recognition of other issues in restoration, for example in increasing or mitigating flood risk, in retaining features of geological interest, and in providing opportunities for recreation and education.

One respondent emphasised the importance of tackling mining legacy issues such as effects on land stability and landscape in policies QE2, QE4 and QE6, and to ensure that mineral resources are not sterilised by renewable energy developments.

Several respondents emphasised the need in policies QE4 and QE5 to protect local building stone resources to maintain the distinctiveness of the built environment.

Annex A – Table of Responses to All Question

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
CRITICAL RURAL SERVICES:							
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?	135	86	42	7	64%	31%	5%
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?	123	89	31	3	72%	25%	3%
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?	123	78	36	9	63%	29%	7%
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.							
Option 1: Sustainable – Climate Change Driven	30	22%		11			
Option 2: Community Based	91	65%					
Option 3: Status Quo	19	14%					
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.	91						
GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE:							
Question GTQ1: Do you agree with the total residential pitch requirements (939 pitches), as identified by the sub-regional Gypsy and Traveller Accommodation Assessments?	186	48	113	25	26%	61%	13%
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?	125	43	62	20	34%	50%	16%
Question GTQ3: Which of the three Options on page 35 for the provision of residential Gypsy and Traveller pitches do you prefer and why?							
Option 1	66	36%		34 (18%)			
Option 2	43	23%					
Option 3	45	24%					
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.	61						

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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?	172	66	77	29	39%	45%	17%
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?	124	43	64	17	35%	52%	14%
Question GTQ7: Do you think the draft Policy for Transit provision should be strengthened? (see page 39)	84	39	41	4	46%	49%	5%
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?	65	42	12	11	65%	18%	17%
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?	70						
Option 1	38	54%					
Option 2	15	21%					
No option ticked but written response given	18	25%					
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?				16			
Allocated on County Basis	46	0.6					
Allocated on a district basis	15	19%					
No preference, but comments made	16	21%					
CULTURE, SPORT AND TOURISM:							
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?	140						
Option 1- Remove the portfolio	41	30%		16 (11%)			
Option 2- Update portfolio to include all regionally significant assets	83	59%					
Question CST2: Do you think that Policy PA10A should "protect", as well as improve existing strategic cultural assets from development?	125	95	24	5	77%	19%	4%
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?	131			5			
Option 1: Retain existing PA10 B & C	11	8%					
Option 2: Update existing PA10 B & C	24	18%					
Option 3: Develop a new policy in addition to PA10 B & C	89	68%					
Question CST4: Do you agree with the strategic gaps identified in the Burns Owens Partnership (BOP) report? (see page 54).	104	50	43	12	48%	41%	11%

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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?	109	81	15	13	74%	14%	12%
QUALITY OF THE ENVIRONMENT:							
Question ENV1: Do you agree with the suggested list of issues a – f on page 65 that a revised Policy QE2 could include?	126	100	15	11	79%	12%	9%
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.	40						
Question ENV2: Which Option on page 65 would you prefer Policy QE2 to follow, and why?							
Option 1: Needs Led	66	45%					
Option 2: Growth Led	31	21%					
Option 3: Competitiveness Led	33	23%					
No option ticked but written response given	17	11%					
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?	94	48	44	2	51%	47%	2%
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.	74						
Question ENV5: Do you agree with the list of issues a – f on page 67 that it is suggested Policy QE4 could include?	126	106	15	5	84%	12%	4%
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	52						
Question ENV6: Do you agree with the list of issues a – j on page 68 that it is suggested Policy QE5 could include?	129	114	7	8	88%	5%	6%
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.	39						
Question ENV7: Do you agree with the list of issues a – i on page 69 that it is suggested Policy QE6 could include?	127	108	13	6	85%	10%	5%
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?	105	66	33	6	63%	31%	6%
Question ENV9: Do you agree with the list of issues a – i on page 70 that it is suggested Policy QE7 could include?	113	91	16	6	81%	14%	5%
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?	90	19	56	15	21%	62%	17%

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
Question ENV11: Do you agree with the list of issues a – i on page 73 that it is suggested Policy QE8 could include?	119	101	10	8	85%	8%	7%
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?	113	95	9	9	84%	8%	8%
Question ENV13: Do you agree with the list of issues a – i on page 75 that it is suggested Policy QE9 could include?	119	92	15	12	77%	13%	10%
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?	106	94	3	9	89%	3%	8%
Question ENV15: Do you agree with the list of issues a – i on page 79 that it is suggested Policy QE1 could include?	102	88	9	5	86%	9%	5%
Question ENV16: Which Option on page 79 would you prefer Policy QE1 to follow, and why?							
Option 1: Environment Led	54	44%					
Option 2: Development Led	17	14%					
Option 3: Spatial Strategy	36	29%					
No option ticked but written response given	16	13%					
Question ENV17: Do you agree with the suggested list of issues a – l on page 84 that a new Flood Risk Policy could include?	127	105	11	11	83%	9%	9%
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?	109	90	9	9	83%	8%	8%
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).							
Option 1: Adopt national target for renewable energy	41	33%					
Option 2: Adopt Regional Energy Strategy targets for renewable energy	16	14%					
Option 3: Sub-regional targets for renewable energy	52	45%					
No option ticked but written response given	11	8%					
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?	103	42	51	10	41%	50%	10%
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)?	107						
Option 1 - Retain existing Policy EN1	27	23%					
Option 2 -Criteria-based policy	75	64%					
No option ticked but response	5	13%					

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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.							
Contribution to the global environment	60						
Contribution to the local economy	61						
Impact of fauna, flora and animal life	61						
Noise	61						
Odour	60						
Traffic Implications	60						
Visual Impact	58						
Other factor(s) (please specify below)	14						
Other factors	36						
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?	124						
Option 1- Regionally Specific Policy	65	52%					
Option 2- Apply PPG2	48	39%					
No option ticked but response	11	9%					
MINERALS POLICY:							
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.	99	43	45	11	43%	45%	11%
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?	66	27	36	3	41%	55%	5%
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?	85	40	38	7	47%	45%	8%
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.	65						

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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.	61						
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.	26						
Question M6: Do you think that minerals resources should be safeguarded in areas covered by national designations for landscape, wildlife conservation and cultural heritage?	88	63	21	4	72%	24%	5%
Question M7: Is there a need for a regional safeguarding policy on coal? Please provide reasons (and where possible, evidence) to support your view.	67	32	28	4	50%	44%	6%
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?	57	30	21	5	54%	7%	9%
Question M9: Do you think that the indicative apportionment outlined in Table 4 on page 106 is realistic?	90	19	63	8	21%	70%	9%
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?	25						
Option 1: Apportion future supplies by existing methods	25	32%					
Option 2: Apportion future supplies using different sub regions	5	6%					
Option 3: Apportion future supplies using different sub regions and methods	41	52%					
No option ticked but written response given	8	10%					
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?	47						
Question M12: Do you think that the provision of future supplies of aggregates in the Region can be determined by applying one of 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	44						
Existing Mineral Infrastructure	40						
Local Resource Availability	42						
Environmental Acceptability and Designations	46						
None of the above	6						
Other (please specify)	13						
No option ticked but written response given	11						

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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?	62	30	17	15	48%	27%	24%
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?	43						
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?							
Option 1: Regional Supply Requirement	7	14%					
Option 2: Supplies for Individual Brickworks	26	52%					
Option 3: Future Supplies from Resource Areas	3	6%					
No option ticked but written response given	14	28%					
Question M16: Do you think that the 13 million tonnes shortfall in clay supplies could be met from quarries within the Region?	35	10	8	17	29%	23%	49%

Annex B – List of Consultation Respondents

Organisation	Name of Respondent
4NW	Deborah Holroyd
Advantage West Midlands	Mark Williets
Alrewas Parish Council	Clr David Butcher
Ancer Spa (Midlands) Ltd - on behalf of various clients	Tom Genway
Association of Local Government Archaeological Officers (West Midlands Regional Group)	Chris Patrick
Biddulph Town Council and Staffordshire Moorlands District Council	Hilda Sheldon
Bigwood Associates Ltd for and on behalf of Noah Ltd, Heritage Manor Ltd & Frontsouth Developments Ltd	Nigel Gough
Birmingham City Council	Rod Chapman
Birmingham International Airport Limited	Davinder Hothi
Bishopstone Group Parish	Catherine Draper
Blaby District Council	Gary Clark
Black Country Consortium	Angie Sheasby/ Laura Shoaf
Black Country Geodiversity Partnership	Alan Cutler
Blore Heath and Folly Wood Action Group	Frederick G. Fisher
Bourne Leisure Ltd - completed by NLP	Margaret Baddeley
Brethren's Gospel Trusts	Mr John R Shephard
Brewood Civic Society	Mr Peter G E Jackson
Brimble Lea & Partners (on behalf of Mr. R. Holden)	Shelly Carl
Brinklow Parish Council	Phil Creek
British Aggregates Association	Peter Huxtable
British Ceramic Federation	Chris Hall
British Geological Survey	Dr John Powell
British Holiday & Home Parks Association Ltd	Joan Clark
British Waterways	Richard Newman
British Wind Energy Association	Gemma Grimes
Bromsgrove District Council	Mike Dunphy
Bromyard & Winslow Town Council	Barbara Stanway
Brownhills Maths & Computing College	Mark Rogers
CABE	Dr Richard Simmons
Campaign to Protect Rural England (West Midlands)	Gerald Kells
Cannock Chase AONB	Ruth Hytch
Cannock Chase District Council	John Heminsley
Carillion Developments Ltd	Stephen Harrington
Catesby Property	John Acres
CEMEX UK Operations Ltd.	Shaun Denny
Centro	Steven Keeley
Church Lawford Parish Council	Pat Goldie
Claverley Parish Council	Peter Collings
Clifton-Upon-Dunsmore Parish Council	W Martin-Flaven
Coalition Against New Quarry Development in S. Staffs	Simon Tulitt
Coalition of Villages West of A38 in East Staffordshire	Anne Anderson
Colwich Parish Council	Viv Harrison
Commission for Rural Communities	Trevor Cherrett
Confederation of UK Coal Producers (CoalPro)	David Brewer
Cotswolds Conservation Board	Malcolm Watt
Council for British Archaeology, West Midlands	Dr Mike Hodder
Country Land and Business Association	Henry Aubrey-Fletcher
Countryside Council for Wales	David Parker
County Sport Partnership Network West Midlands	Simon Hall
Coventry City Council	Clr Ridley

Organisation	Name of Respondent
Coventry Cultural Partnership	Alice Davey
CPRE	Miss V Kendrick
CRASH	Chris Haynes
Crest Strategic Projects Ltd	Nicolle Phillips
Defence Estates	Jodie Ball
Derbyshire Gypsy Liaison Group	Roger Yarwood
Diocese of Worcester	Rev John E Paxton
Dudley MBC	Brian Roberts
Dunchurch Parish Council	R T Aird
East Staffordshire Borough Council	Phillip Somerfield
English Heritage	Amanda Smith
Ennstone Johnston Ltd	Mark Blakeway
Environment Agency	Helen Wakeham
Federation of Small Businesses	David Caro
Firstplan	Mike Woolner
Fisher German LLP	Kay Davies
Flyford Flavell, Grafton Flyford and North Piddle Parish Council	David Waide
Forestry Commission	Bill Heslegrave
Fradley and Streethay Parish Council	S Lee and B Brown
Friends of the Earth (FOE) West Midlands	Chris Crean
Friends, Families and Travellers and Traveller Law Reform Project	S J Staines
FTMINS	Francis Thompson
Fulford Parish	Mr M R Pointon
Fulford Parish Council	Stephen Beck
Globally Local LLP	Malcolm Currie
Gloucestershire County Council	Rob Niblett
Government Office West Midlands	Dave Marr
Great Wyrley Parish Council	MJ Holder
GVA Grimley for Enville and Staleybridge Estates	Sarah Taylor
Hagley Parish Council	Catherine Humphries
Hampton in Arden Society	G R Goodall
Harborough Magna Parish Council	Ian Bennett
Harper Adams University College	Dr David Llewellyn
Hartlebury Parish Council	Jenny Jones
Health Protection Agency	Paul Fisher
Heaton Planning Ltd on behalf of Lafarge Aggregates Ltd	Spencer Warren
Heine Planning	Alison Heine
Hereford & Worcester Chamber of Commerce	Gary Woodman
Hereford & Worcester Gardens Trust	Mrs J Patton
Hereford City Council	Steve Kerry
Hereford Civic Society	Executive Committee
Herefordshire and Worcestershire Earth Heritage Trust	Moira Jenkins
Herefordshire Council	Peter Yates
Herefordshire Local Access Forum	Richard Gething
Herefordshire Ramblers Association	Arthur Fraser
Herefordshire Voluntary Action	Susan Black
Higham & Co for Nurton Developments Ltd	Matthew Waugh
Highways Agency	Mark Clough
Hilderstone Parish Council	Roy Clark
Hindlip, Martin Hussingtree & Salwarpe Parish Council	Ms B Meddings
Hinkley & Bosworth Borough Council	Andrew Killip
Home Builders Federation	James Stevens
Homes and Communities Agency	Helen Wilkes
Individual	Anonymous

Organisation	Name of Respondent
Individual	Anonymous
Individual	JW Barr
Individual	Ken Broomfield
Individual	James Bullett
Individual	David Byard
Individual	Brian Cadman
Individual	Frank Cochrane
Individual	Joye Colbeck
Individual	Jonathan Coulborn
Individual	Stephen Cox
Individual	Graham Coxon
Individual	Sheila Crittenden
Individual	Claire Deakes
Individual	Karl Deakes
Individual	Ian Duckworth
Individual	Mrs Lynda Everitt
Individual	Ellen Faulkner
Individual	Paul Fisher
Individual	Mr J C Fleming
Individual	Mrs M C Fleming
Individual	Alan Forrest
Individual	John Francis
Individual	Arthur Fraser
Individual	Mary Gair
Individual	Kathryn Gibson
Individual	Elizabeth Greetham
Individual	Heather Grossman
Individual	B D Harrison
Individual	Sally Hart
Individual	Dr D O and Mrs H Hayward
Individual	Agnes Holmes
Individual	Sue and Don Hood
Individual	Glenis Johnson
Individual	Mr W Kerswell
Individual	Jean Macdonald
Individual	Graham and Mary Martin
Individual	Peter McKay
Individual	John Miller
Individual	Mr R Mobley
Individual	Mr C Narrainen
Individual	Michael Parkes
Individual	Maureen Parry
Individual	Stefan Peter
Individual	Mrs A Pulsford
Individual	Mr and Mrs PD Robinson and Mr D Robinson
Individual	Nicholas Robson
Individual	Roger Sanders
Individual	Leandra Smith
Individual	Dr R Taylor
Individual	Tracy Vaughan
Individual	Mrs U Voisey
Individual	Richard Watkins
Individual	James Went

Organisation	Name of Respondent
Individual - G&T response	Miracle Lee
Individual - G&T response	Ray Lee
Individual - G&T response	Roman Lee
Individual - G&T response	Roseann Lee
Individual - G&T response	Wesley Lee
Individual - G&T response	Barbara Lock
Individual - G&T response	Caroline Locke
Individual - G&T response	Edmaun Locke
Individual - G&T response	Sally Locke
Individual - G&T response	Sharon Locke
Individual - G&T response	Sylvia Locke
Individual - G&T response	Sarah Loveridge
Individual - G&T response	Thomas Maguire
Individual - G&T response	Ann Maughan
Individual - G&T response	Margaret McDonagh
Individual - G&T response	John McDonough
Individual - G&T response	Samantha McFarlane
Individual - G&T response	Diane Moore
Individual - G&T response	Mrs M P Moore
Individual - G&T response	Henry O'Neill
Individual - G&T response	Judith Penam
Individual - G&T response	Paula Porter
Individual - G&T response	Brenda Price
Individual - G&T response	Cheryl Price
Individual - G&T response	David Price
Individual - G&T response	Jamie Price
Individual - G&T response	Mizzelle Price
Individual - G&T response	Rose Price
Individual - G&T response	Michael Reilly
Individual - G&T response	Bob Roberts
Individual - G&T response	Bobby Roberts
Individual - G&T response	Caroline Roberts
Individual - G&T response	Lorraine Roberts
Individual - G&T response	Patricia Roberts
Individual - G&T response	Jo Rogers
Individual - G&T response	Aaron Smith
Individual - G&T response	Rachel Smith
Individual - G&T response	Rosie Smith
Individual - G&T response	Sam Smith
Individual - G&T response	Sarah Smith
Individual - G&T response	Verna Smith
Individual - G&T response	Mr and Mrs Smith
Individual - G&T response	Mr Smith
Individual - G&T response	Mrs Smith
Individual - G&T response	Mrs J Spencer
Individual - G&T response	Mr Squires
Individual - G&T response	Steve
Individual - G&T response	Mark Sumner
Individual - G&T response	Hope Taylor
Individual - G&T response	Mrs Waddell
Individual - G&T response	Mary Ward
Individual - G&T response	Julie and Adrian Warwick
Individual - G&T response	Helen Watton
Individual - G&T response	Lynne Watton

Organisation	Name of Respondent
Individual - G&T response	Rosemary Watton
Individual - G&T response	Mark Westwood
Individual - G&T response	James White
Individual - G&T response	Mr & Mrs White
Individual - G&T response	Ann Marie Williamson
Individual - G&T response	Bridget Williamson
Individual - G&T response	Mary Wilson
Individual - G&T response	Pat Wilson
Individual - G&T response	Robert and Margaret Wilson
Individual - G&T response	Louise Wright
Inland Waterways Association	Phillip Sharpe
Inland Waterways Association - Shropshire and Herefordshire	Vaughan Welch
Institute for Creative Enterprise	Christine Hamilton
Irish Traveller Movement in Britain	Scott Phillips
Joint Core Mineral Project Strategy Group	Matt Griffin
JVH Town Planning Consultants Ltd	Thomas Beavin
Kenilworth Town Council	Geoffrey D Symes
Kington Town Council	Gwilym Rippon
Kinver Parish Council	Mrs Rachel Davis
Lawley & Overdale Parish Council	Sharon Clayton
Leamington Hastings Parish Council	J A Turner
Leominster Town Council	David Russell
Library Supply International Ltd	S I Martin
Lichfield Civic Society	John Thompson
Lichfield Constituency - MP	Michael Fabricant MP
Lichfield District Council	Craig Jordan
LineHouse Caravan Site	Jimi Docherty
Localise West Midlands	Karen Leach
Loggerheads Parish Council	David Loades
Lower Broadheath Parish Council	Mike Davis
Madeley Aggregates Limited	Gez Willard
Madeley Parish Council	Ann Spilsbury
Malvern Hills AONB	Andrew Blake
Malvern Hills DC, Worcester CC and Wychavon DC (Joint Response)	Gary Williams
Malvern Hills District Footpath Society	W M Everitt
Member of WM Regional Sustainability Forum	Beryl Metcalfe
Merlin Entertainments - Alton Towers	Hannah Whitney
Merlin Entertainments - Warwick Castle	Hannah Whitney
Midland Wind & Water Mills Group	A Bonson
Mineral Products Association Ltd	Andrew Bromley
Monks Kirby Parish Council	Jane Wright, William Wooliscroft
My Local Community	Mrs D English
Nathaniel Lichfield and Partners on behalf of National Grid	Ian York
National Farmers Union	Sarah Faulkner
National Forest Company	Simon Evans
National Grid	Les Morris
Natural England	Nick Young
New Hall Neighbourhood Forum	Bill Hoad
Newcastle under Lyme Council	Sean Walsh
Newton and Biggin Parish Council	Heather Miles
North Staffordshire Regeneration Partnership	B J Davies
North Warwickshire Borough Council	Dorothy Barratt
Norton Juxta Kempsey Parish Council	Howard Turvey

Organisation	Name of Respondent
Nuneaton and Bedworth Borough Council	Andrew Collinson
Pailton Parish Council	Mrs J Pharoah
Parliamentary Candidate for Rugby & Wolvey Ward Residents	Mark Pawsey
Peak District National Park	Peter Abbott
Peak District National Park Authority	David Bent
Pegasus Planning Group (Gloucestershire)	Paul Burrell
Pegasus Planning Group (West Midlands)	Chris May
Plain English Campaign	Marie Clair
Play England	George Turvey
Ramblers Association (Staffordshire area)	Majorie Cashmore
Ramblers Worcestershire	Clive Bostle
Redditch Borough Council	Louise Brockett
Renewable Energy Club - Warwick District	Jonathan Horsfield
RICS	Deborah Walsh
Rooftop Housing Group Limited	Juliana Crowe
Ross-on-Wye Town Council	R Lewis
Rowney Green Association	Dorothy M Snaddon
Rugby and Kenilworth MP	Jeremy Wright MP
Rugby Borough Council	Cllr Adrian Warwick
Rugby Borough Council	Cllr Helen Walton
Rugby Borough Council	Cllr Neil Campbell
Rugby Borough Council	Mrs Sally Bragg
Rugby Borough Council	Rob Back
Rugby Radio Station (completed by David Lock Assocs)	Leanne Keltie
Ryton on Dunsmore Parish Council	Mr G Tooke
Salford Priors Parish Council	Kim James
Sandwell MBC	Philippa Smith
Sandwell PCT	No name given
Self employed consultant	Alan F Cook
Severn Navigation Restoration Trust	Charles Kenchington
Severn Trent Water Ltd	John Nicholson
Shilton Parish Council	Mrs Chris Warburton
Shotteswell Parish Council	Val Ingram
Shrewsbury and Atcham - MP	Daniel Kawczynski MP
Shropshire County Council	Lois Dale
Shropshire Hills AONB Partnership	Phil Holden
Silverdale Parish Council	Mr J Hyde
Solihull Metropolitan Borough Council	Dave Simpson
South Staffs District Council	Andy Johnson
South Staffs District Council	Cllr B. Edwards
South Staffs District Council	Cllr Joan Williams
South Staffs District Council	Cllr Roger Lees
South West Councils	Stuart Todd
Stafford Borough Council	Cllr AH Stafford Northcote
Stafford Borough Council	Cllr Frank Chapman
Stafford Borough Council	Paul Windmill
Stafford Historical & Civic Society	William J Read
Staffordshire County Council	Bob Fraser
Staffordshire County Council	Cllr Mike Maryon
Staffordshire County Council	Erica Bayliss
Staffordshire County Council	Geoffrey Martin
Staffordshire County Council	Ian Parry
Staffordshire County Council	John Rowley
Staffordshire County Council	Patrick Corfield

Organisation	Name of Respondent
Staffordshire County Council	Tony Lovett
Staffordshire County Council & South Staffs District Council	Robert Marshall
Staffordshire County Council / Stafford Borough Council	Ivan Jennings
Staffordshire Moorlands	Ian Lawson
Staffordshire Moorlands District Council	Elaine Baddeley
Staffordshire Moorlands District Council	Kathryn Swift
Staffs and Stoke Planning Forum	Cllr Brian Cox
Stansgate Planning LLP	Mr Andrew Murphy
Stoke-on-Trent City Council	Brian Davies
Stoke-on-Trent City Council	Noel Boothroyd
Stone - MP	Bill Cash MP
Stottesdon and Sidbury Parish Council	Mrs F Morris
Stratford-on-Avon District Council	Colin Staves
Stretton under Fosse Parish Council	David Brian Collins
Sustainable Staffordshire	Trevor Stokes
Swindon Parish Council	No name given
Tamworth Borough Council	Matthew Bowers
Tanworth-in-Arden Parish Council	Diane Malley
Tarmac	Malcolm Lawer
Telford & Wrekin / Shropshire Council	Helen Ridler
Telford & Wrekin Council	Mark Edwards
The Coal Authority	Miss Rachael Bust
The Kenilworth Society	Joanna Illingworth
The National Trust	Liz Roberts
The NEC	Martin Dyer
The Royal Society for the Protection of Birds	Colin Wilkinson
The Shakespeare Birthplace Trust	Diana Owen
The Showmen's Guild of Great Britain	Lynn Fleetwood
The Theatres Trust	Rose Freeman
Three Counties Showground, Malvern	Inderjit Singh Shokar
Tiberton Parish Council	DJ Flack
Tourism West Midlands - AWM	Brian Summers
Town and Country Planning Association	Michael Chang
Tredington Parish Council	David Botterill
Trenport Investments Ltd (c/o Vincent & Goring)	Martin Friend
UK Coal plc	Spencer Warren
Walsall Children's Services - Serco	Sarah Hodgson
Walsall Council	Mike Smith
Warwick District Council	Cllr Bertie MacKay
Warwick District Council	Gary Stephens
Warwickshire County Council	Andy Cowan
Warwickshire Geological Conservation Group	Ian Fenwick
Warwickshire Rural Community Council	Linda Ridgley
West Mercia Police (on behalf of all Police Authorities in West Midlands)	Andrew Morgan
West Midlands Biodiversity Partnership	Jeff Edwards
West Midlands Business Council	James Watkins
West Midlands Faiths Forum	Rev Dr John Hall
West Midlands Geodiversity Partnership	Alan Cutler
West Midlands Regional Aggregates Working Party	Tony Lyons
West Midlands RTP1	Rynd Smith
West Midlands Rural Affairs Forum	Bob Forster
West Midlands Tourism Development Officers Group	Penny Russell
West Midlands Wildlife Trusts	Chris Parry

Organisation	Name of Respondent
White Ladies Aston Parish	A Brodrick
WM Amenity Societies Association	George Goodall
WM Planning & Transportation Sub-Committee	Simon Rowberry
WM Rural Community Action Network	Lorna Pearcey
Wolston Parish Council	Virginia Neild
Wolvey Parish Council	Margaret Cartwright
Woodland Trust	Justin Milward
Wootton Wawen Parish Council	Mr P G Holt
Worcester Civic Society	Dr Heather Barrett
Worcestershire County Council	Dale Bristow
Worcestershire Gypsy Roma Traveller Partnership	Reverend John E Paxton
Wychavon District Council	Keith Handy
Wyre Forest District Council	Ken Harrison
Wythall Parish Council	No name given
Other	Hereford G & T Discussion Note
Other	Nuneaton G&T Discussion Note