

DRAFT

West Midlands Regional Assembly

Draft Summary - Analysis of Responses to the West Midlands RSS Phase 3 Revision Options Consultation Document

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ANNEX A – TABLE OF RESPONSES TO ALL QUESTION

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SUMMARY OF CONSULTATION REPONDEES

Number of Responses by Organisation category:

Organisations:	No. of responses:	%
Local Authority - County or Unitary	27	6%
Local Authority - District	35	8%
Parish Council	46	11%
Non Departmental Government Body (NDGB)	18	4%
Social, Economic, Environment Partner (SEEP)	85	20%
Business	38	9%
Individual	74	17%
Individual – Gypsies and Travellers response (G&T)	112	26%
TOTAL	435	100%

Number of Responses by Sub-Region / Region:

Sub-Regions:	No. of responses:	%
<i>From within the WM Region:</i>		79%
Herefordshire	15	3%
Shropshire	43	10%
Staffordshire	90	21%
Warwickshire	66	15%
West Midlands	84	19%
Worcestershire	47	11%
<i>Outside the WM Region:</i>		21%
East Midlands	35	8%
London	15	3%
North West	5	1%
East of England	1	0.2%
South East	10	2%
South West	9	2%
Yorkshire	2	0.5%
None given	13	3%
TOTAL	435	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	32	38	24	29	24
NDGB	10	4	14	14	10
SEEP	41	25	60	61	36
Business	12	3	12	17	15
Individual	24	30	22	28	40
Individual - G&T	0	97	0	0	0
TOTAL	157	248	173	193	167

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:	CRC1 Yes	%	CRC1 No	%	No option ticked	Total responses
LA - County or Unitary	10	7%	1	1%	2	
LA - District	13	10%	4	3%	1	
Parish Council	20	15%	10	7%		
NDGB	8	6%	1	1%	1	
SEEP	23	18%	10	7%	1	
Business	2	1%	4	3%	1	
Individual	9	7%	11	8%	1	
Individual - G&T	0	0%	0	0%		
TOTAL	86	64%	41	31%	7	134

64% of respondents to this question agree with CRC1 - including 23 out of 28 Local Authority respondees. 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; and that it should be left to more detailed planning in LDFs to determine specific service provision issues for particular districts or settlements.

Instead of a prescriptive list of critical services, some recommend a RSS policy which requires LDFs and LSPs to plan to improve accessibility to services in rural areas, and for the RSS to provide a framework of broad categories of critical rural services that local partners can draw upon in planning local service delivery.

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:	CRC2 Yes	%	CRC 2 No	%	No option ticked	Total responses
LA - County or Unitary	7	6%	4	3%		
LA - District	14	11%	5	4%	1	
Parish Council	25	20%	5	4%	1	
NDGB	4	3%	4	3%		
SEEP	19	16%	13	11%	1	
Business	5	4%	0	0%		
Individual	15	12%	2	2%		
Individual - G&T	0	0%	0	0%		
TOTAL	89	73%	33	27%		122

73% 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.

However, some respondees are unsure about what role in policy terms the RSS could play to address this issue; and others argue that there is no particular reason why accessible rural communities should be given precedence over more remote rural areas – instead 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. Other 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.

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:	CRC3 yes	%	CRC2 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%	14	11%	1	29
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	64%	35	29%	9	122

64% 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.

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.

Many respondees who disagree with the statement in CRC3 argue that allowing new development is no guarantee that services will be improved, and that new developments 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.

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.

Organisations:	Option 1- Sustainable – Climate Change Driven	%	Option 2- Community Based	%	Option 3 – Status Quo	%	No option ticked
LA - County or Unitary	1	1%	4	3%	9	7%	1
LA - District	5	4%	16	12%	2	1%	2
Parish Council	5	4%	20	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%	90	65%	19	14%	11

Note: Option 1 + 2 = 10 responses. Percentages based on the 138 respondees.

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 respondents 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.

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	49	26%
No of which:	112	61%
No – too low	57	31%
No – too high	55	30%
No option ticked but comments given	25	13%
Total detailed comments	147	

186 responded to this question of which 147 submitted specific comments. The high level of responses illustrates that this is a particularly sensitive issue and has given rise to both polarised views and a number of very controversial comments. Overall numbers - and distribution of those numbers - are of particular concern to District and Parish councils, many of whom challenge the robustness of the Gypsies and Travellers Accommodation Assessment (GTAA) and argue 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.
- 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, or that based on their own growing families, children are having to leave or move into houses when they marry or experience overcrowding, being moved on or forced to use 'unauthorised sites' and that there is large latent demand which is not fully reflected in the GTAA.
- Some 30% of respondents (55 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. Objections are based on their own assessments of need (or perceived lack of it) in their own 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 numbers represent extreme overestimates, that the area already over provides sites and there is no need for any more. Other areas that consider the numbers too high include Rugby, Worcester, Herefordshire and the Black Country. Parishes which challenge the numbers 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. This group also included a number of angry responses (including negative and often offensive statements on Gypsies and Travellers) from individuals in rural parishes which already have substantial numbers or experience of G&T sites or which feel that they are expected to 'bear the burden' of new pitches which would more appropriately be located in urban areas, 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.

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	35%
No	62	50%
No option ticked but comments made	19	15%
Total	124	100%

Of the 124 responses to this question, 35% (43 in total) agreed that the three options provided a good range of solutions, but 50% felt that they did not; while a further 15% 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 3 options do little to address the current imbalances and they seem to perpetuate the current patterns of provision or are thought to be based on too high numbers.
- The options do not sufficiently take into account needs to protect the green belt.
- 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.
- The evidence base is flawed and therefore there should be an option with a lower total. Staffordshire County Council, District Councils and numerous individuals argue that the variations in levels of provision across Staffordshire are so marginal as not to represent meaningful options.
- Others argue for a greater redistribution option, eg. “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”. A particularly well organised response from Wolvey Parish Council, public meeting and individuals (more than 20 responses) argue that the range of options is insufficient and that a 100% redistribution should be considered.

New options are proposed by Cannock Chase Council and Wolvey Parish. A common view is that all options should encourage 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 developed within the planning system context and that this would help avoid conflict with the G&T community.

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	65	34%
Option 2	44	23%
Option 3	45	24%
No option ticked but comments made	35	19%

169 responses were received, with Option 1 marginally preferred because of strong support from individuals (particularly within G&T communities and those who work with them) with equal support (~24%) for Options 2 and 3. A substantial minority (19%) 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 do not have to be split up – especially when children marry at 17-18 years and are widely reported as having to move away or into houses. 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 – particularly in the Black Country. 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, the need for some redistribution from traditional areas to those areas which have been slow to provide is highlighted (West Midlands Rural Affairs Forum). A limitation of the approach was highlighted as *'The concept of need where it arises is based upon the ability of Councils to have previously allowed pitches within their authority boundaries, and conversely those local authorities which have not to date provided any or few pitches would be allowed to continue to do so'*. Option 1 is also opposed by some individuals who question the overall basis for GTAA and needs and are opposed to Gypsy and Traveller lifestyles.

- **Option 2** is 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 greenbelt 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 high levels of sustainability, in particular social and physical integration with existing and planned communities within the life of the plan period and respecting Greenbelt restrictions. However, concerns were expressed by English Heritage that not all constraints have been fully addressed.

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 - note that *'Option 2, provides a balance between meeting the accommodation needs of G&T 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) is 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. The main arguments cited are that this appears to provide the most equitable dispersal of pitches across the region and distributes the costs most fairly, without placing what is seen as an unfair 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'. Consultees stress that existing patterns are often not due to lack of demand but rather to intolerance and lack of provision by LAs 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 is deeply offensive. In addition the option is 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)	67	39%
No – too low	48	28%
No – too high	27	16%
No option ticked but written response given	29	17%
Total	171	100%

Of the total 171 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 responses in this category noted that need has been assessed solely on the basis of GTAA, but that they have no reason to consider it insufficient.

Nearly a third of respondents – almost all from the Gypsy and Traveller community – felt that the number proposed was too low on the basis of their family and friends’ experiences and aspirations to travel around the area and visit family, and in the interests of reducing the number of ‘unauthorised’ sites currently operating across the region.

16% of respondents feel the numbers are too high. There is a considerable overlap with those reporting that GTQ1 figures are overestimated. The main reason given for disagreement is the questionable robustness of the GTAA. Many responses were received from across Staffordshire and parishes (see GTQ2) with existing provision of traveller sites. However, 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 – or as large sites or adjacent to permanent sites, as this is seen as causing trouble and conflict with existing 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	44	35%
No	64	51%
Not sure (no response but comments submitted)	17	14%
Total	125	100%

Of the total 125 responses, 35% agree that the geographical provision will meet G&T accommodation needs, while the majority (51%) did not. The main reasons cited for the latter view are that:

- 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 and Worcestershire)
- Giving some authorities a nil allocation removes any incentive for them to contribute to further provision.
- There need to be more smaller and 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	42	49%
Not sure (no response but comments submitted)	4	5%

Of the 85 responses to this question 46% considered that the policy should be strengthened and 49% 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.

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

	Number	Percentage
Yes	43	65%
No	12	18%
No option ticked but comments made	11	17%

Of the 66 responses to this question, the majority (65%) agreed that the provision of 118 plots for Travelling Show people will meet their accommodation needs. A small minority (18%) did not agree based on a range of views - from feeling that the number of pitches was too small to those (echoing their responses to GTQ1 and GTQ3) that feel there is no evidence for any additional need or that no provision for transit sites is necessary. 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 Show people do you favour?

	Number	Percentage
Option 1	38	54%
Option 2	15	21%
No option selected but comment submitted	17	24%

There were a total of 70 responses on the proposed options for distribution of additional plots. The majority (54% of respondees) favour Option 1 (providing the need where it arises). 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. Many other local authorities support Option 1 because it is generated from GTAAs which involve liaison with travellers (eg reflecting the views of the Showman’s Guild that Travelling Show 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 show people 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).

17 respondents (24%) 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 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 Show people should be allocated on a County basis, rather than down to district level?

	Number	Percentage
Allocated on County Basis	45	59%
Allocated on a district basis	15	20%
No preference, but comments made	16	21%

Of the 76 responses to this question a county basis for distribution is the preferred mechanism (59% of respondents). 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.

20% of respondees favour Option 2. 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 were received specifically from Travelling and Show people.

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%	15	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%	2	1%	14
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	41	30%	82	59%	15	11%	138

There is 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 exhaustive. Alternatively, an illustrative list of assets across generic themes could be highlighted in supporting text, 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.

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	18	15%	1	1%	1	1%	20
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	94	76%	24	20%	5	4%	123

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

However, respondents 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.

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.

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	13	13%	3	3%	1	1%	17
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	49	47%	43	41%	12	12%	104

There is no clear agreement amongst respondents on the strategic gaps identified in the BOP report, and 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 respondents include:

- tourism accommodation
- natural environment and historic assets
- Public Rights of Way Network
- Inland waterways network
- major sporting events.

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%	1	1%	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	75%	14	13%	13	12%	108

75% of respondents (including 24 out of 25 Local Authority respondents) agreed that the options could help to address poor quality and access issues in relation to culture, sport and tourism assets.

Other comments include that:

- 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 LSDF'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 (PROW) etc.

5 QUALITY OF THE ENVIRONMENT

5.1 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	9	7%	3	2%	3	2%	15
Parish Council	18	15%	3	2%	0	0%	21
NDGB	8	7%	0	0%	1	1%	9
SEEP	37	30%	3	2%	2	2%	42
Business	4	3%	0	0%	2	2%	6
Individual	9	7%	3	2%	2	2%	14
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	97	79%	15	12%	11	9%	123

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	14	10%	4	3%	4	3%	2	24
NDGB	6	4%	1	1%	3	2%	0	10
SEEP	22	15%	9	6%	5	3%	6	42
Business	1	1%	0	0%	2	1%	1	4
Individual	4	3%	5	3%	5	3%	1	15
Individual - G&T	0	0%	0	0%	0	0%	0	0
TOTAL	64	44%	31	22%	33	23%	16	144 (note 1)

Note 1: some ticked more than one option.

79% of those responding (123) supported the list of issues for policy QE2. A number of views were given on particular issues which should not be included, with (d) on the West Midlands Brownfield Land working group and (f) on the regional Centre of Excellence being issues that emerged as themes. A range of suggestions were given for additional issues to include, with a number of themes emerging, including

- Creating new environment elements is either minimised, or lost altogether.
- 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. This is a regional issue
- Encourage planning for green infrastructure
- Emphasise multi-functional benefits

5.2

QE4 GREENERY, URBAN GREENSPACE AND PUBLIC SPACES

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
LA - County or Unitary	11	9%	4	3%	0	0%	15
LA - District	17	14%	2	2%	0	0%	19
Parish Council	19	15%	2	2%	1	1%	22
NDGB	7	6%	0	0%	2	2%	9
SEEP	35	28%	4	3%	2	2%	41
Business	6	5%	0	0%	0	0%	6
Individual	9	7%	3	2%	0	0%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	104	84%	15	12%	5	4%	124

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.

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

5.3

QE5 PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT

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

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	21	17%	0	0%	1	1%	22
NDGB	8	6%	0	0%	2	2%	10
SEEP	35	28%	4	3%	1	1%	40
Business	5	4%	1	1%	1	1%	7
Individual	11	9%	0	0%	1	1%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	112	88%	7	6%	8	6%	127

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.

5.4 QE6 CONSERVATION, ENHANCEMENT AND RESTORATION OF THE REGION'S LANDSCAPE

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

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	20	16%	0	0%	1	1%	21
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	107	85%	13	10%	6	5%	126

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

5.5 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	11%	0	0%	14
LA - District	12	12%	1	1%	2	2%	15
Parish Council	17	17%	3	3%	2	2%	22
NDGB	5	5%	2	2%	0	0%	7
SEEP	19	18%	12	12%	1	1%	32
Business	2	2%	0	0%	0	0%	2
Individual	7	7%	3	3%	1	1%	11
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	65	63%	32	31%	6	6%	103

Two thirds of respondents agreed with the proposed targets in Annex C, and one third disagreed. 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.

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.

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.

5.6 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	14%	0	0%	2	2%	18
Parish Council	18	15%	0	0%	1	1%	19
NDGB	8	7%	0	0%	1	1%	9
SEEP	30	26%	6	6%	2	2%	38
Business	4	3%	0	0%	1	1%	5
Individual	9	8%	3	3%	0	0%	12
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	99	85%	10	10%	8	7%	117

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.

5.7 PROTECTION OF AGRICULTURAL LAND

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

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	22	20%	0	0%	1	1%	23
NDGB	6	5%	0	0%	2	2%	8
SEEP	25	23%	6	5%	2	2%	33
Business	3	3%	0	0%	0	0%	3
Individual	12	11%	0	0%	1	1%	13
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	93	84%	9	8%	9	8%	111

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 QE section.

5.8

QE9 THE WATER ENVIRONMENT

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

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	17	15%	1	1%	2	2%	20
NDGB	7	6%	0	0%	2	2%	9
SEEP	28	24%	6	5%	4	3%	38
Business	1	1%	2	2%	0	0%	3
Individual	7	6%	4	3%	0	0%	11
Individual - G&T	0	0%	0	0%	0	0%	0
TOTAL	90	77%	15	13%	12	10%	117

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.

5.9

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	12%	0	0%	2	2%	14
LA - District	15	15%	0	0%	4	4%	19
Parish Council	19	18%	0	0%	2	2%	21
NDGB	8	8%	0	0%	0	0%	8
SEEP	24	23%	1	1%	1	1%	26
Business	3	3%	0	0%	0	0%	3
Individual	10	10%	2	2%	0	0%	12
Individual - G&T	0	0%	0	0%	0	0%	-
TOTAL	91	88%	3	3%	9	9%	103

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 issue being addressed in RSS.

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.
- 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.
- Adding examples of delivery mechanisms under issue (i) would aid understanding; add issues of building and environmental design quality; international / global environmental goals.
- 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.

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.

5.11 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

Strong agreement with the list of issues (83% of respondees) and broad welcome for the flood risk policy. 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. 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.

5.12 ENERGY

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

Organisations:	Yes	%	No	%	No option ticked but response	%	Total
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, perhaps being more of a matter for specific Supplementary Planning Documents.

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	17	15%	2	2%	10	9%	5	34
Business	1	1%	0	0%	0	0%	0	1
Individual	3	3%	1	1%	6	5%	2	12
Individual - G&T	0	0%	0	0%	0	0%	0	0
TOTAL	38	32%	16	14%	52	44%	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. 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 be 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

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 and no clear consensus. However, the majority of LAs (particularly County and Unitaries) are against regional targets for specific renewable energy and low carbon technologies. Arguments for (yes) and against (no) 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”.
- **“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”. “We must avoid being too prescriptive about how energy will be generated and retain flexibility to adapt to new technologies”. 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 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	21	22	25	10	10	13	23	
4	14	12	15	14	14	8	13	
3	4	15	9	16	12	19	7	
2	10	5	7	12	11	15	7	
1	4	4	3	6	11	3	6	
0 = least important	5	2	1	2	1	1	1	
Total responses	58	60	60	60	59	59	57	35

Note: 66 respondents gave answers to ENV22.

Some (~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 and quality of life
- Community ownership and participation
- Local demand/community needs
- Contribution to local economy
- 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
- Impact on landscape
- 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

5.13 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)".
- 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 greenbelt policy at the national level".

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%	9	9%	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 among those responding was evenly split between whether to safeguard key minerals and infrastructure, or all minerals and key infrastructure. Safeguarding all minerals was felt to give flexibility for the future, but also that development may be unnecessarily restricted. Some felt that it was not necessary to safeguard all minerals and that local safeguarding is adequate for some minerals. There were many references to inconsistency with national planning policy.

The balance of opinion was slightly against providing a higher level of protection for Etruria Marl, which was felt can be adequately dealt with at local level.

There was equal support for either taking, or not taking, a different approach to safeguarding in rural and urban areas, although three quarters felt that minerals should be safeguarded in designated areas.

There was no clear support for the development thresholds suggested. Some felt that all factors should be considered, others that none should be set.

There was large support for safeguarding of infrastructure related to secondary materials and for sustainable transport infrastructure for all minerals. Buffer zones or consultation zones were generally supported as methods of safeguarding, although some felt these were inappropriate/unworkable and some that it should be left to lower tiers of planning.

Opinion was evenly split on the need to include safeguarding for coal. Of those responding, a half supported greater emphasis on releasing energy from coal seams, while a third did not.

Views included:

- There are commercial opportunities within the coalfields for coal seams that currently cannot be mined using conventional methods. New technologies may make deposits economical and technologically viable in future.
- It 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.
- There is no need for regional policy and it may be prejudicial to second-guess national policy.

Suggestions were made for other matters which policy M4 should address, including restoration to capture benefits (geodiversity, health & wellbeing, education, biodiversity, leisure, tourism, sport, cultural).

6.2 FUTURE SUPPLIES OF CONSTRUCTION AGGREGATES

A large majority said that the apportionment in table 4 was not realistic. There was a significant body of opinion that Staffordshire's allocation is too high, and some feeling that the regional figure is also too high. There was a call for a comprehensive regional assessment of aggregate supply options before new sub regional apportionments are decided, taking account of issues such as growth projections, Code for Sustainable Homes and increasing use of secondary aggregates.

In terms of methods of apportioning, most support was for option 3 (different sub-regions and methods). Option 1 (existing methods) had less support, and option 2 (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;
- Principles of sustainability, fairness and proximity should apply in identifying locations and scales of supply of aggregates;
- The existing system (option 1) is proven whereas others are not and will be difficult to bring forward and secure agreement.

A range of suggestions were given for additional policy guidance to increase use of secondary aggregates, although there were no particular themes emerging.

There was broadly equal support for each of the factors for determining future supplies of aggregates in the region, with most of those responding supporting all. A half felt that the existing sub-regions should be used, and a quarter felt that the section 4(4) authority proposals should be used. New sub-regions were thought to provide for needs where they arise and would help to address equity issues, while more evidence and justification was felt to be needed before a new system is introduced.

6.3 FUTURE BRICK CLAY PROVISION

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.

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 real demand i.e. maintaining supply at local brick and tile works.

Opinion was evenly divided as to whether the shortfall in supplies could be met from quarries within the region.

Most of those responding supported all the suggested criteria to identify locations for stockpiles. Others supported various combinations of some criteria, with road/rail access and avoiding environmental impacts supported a little more than others.

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?	134	86	41	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?	122	89	33	3	73%	27%	
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?	122	78	35	9	64%	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%					
Option 2: Community Based	90	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	49	112	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?	124	43	62	19	35%	50%	15%
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	65	34%		35			19%
Option 2	44	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.	60						
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?	171	67	75	29	39%	44%	17%

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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?	125	44	64	17	35%	52%	14%
Question GTQ7: Do you think the draft Policy for Transit provision should be strengthened? (see page 39)	85	39	42	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?	66	43	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			17			24%
Option 1	38	54%					
Option 2	15	21%					
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?	76			16			21%
County basis	45	59%					
District basis	15	20%					
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?	138			15			11%
Option 1 - Remove the portfolio	41	30%					
Option 2 - Update portfolio to include all regionally significant assets	82	59%					
Question CST2: Do you think that Policy PA10A should "protect", as well as improve existing strategic cultural assets from development?	123	94	24	5	76%	20%	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?	130			6			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	49	43	12	47%	41%	12%
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?	108	81	14	13	75%	13%	12%

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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?	123	97	15	11	79%	12%	9%
Question ENV2: Which Option on page 65 would you prefer Policy QE2 to follow, and why?	144			16			11%
Option 1: Needs Led	64	44%					
Option 2: Growth Led	31	22%					
Option 3: Competitiveness Led	33	23%					
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?	93	48	43	2	52%	46%	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.	87						
Question ENV5: Do you agree with the list of issues a – f on page 67 that it is suggested Policy QE4 could include?	124	104	15	5	84%	12%	4%
Question ENV6: Do you agree with the list of issues a – j on page 68 that it is suggested Policy QE5 could include?	127	112	7	8	88%	6%	6%
Question ENV7: Do you agree with the list of issues a – i on page 69 that it is suggested Policy QE6 could include?	126	107	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?	103	65	32	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?	110	88	16	6	80%	15%	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?	88	0	0	14	0%	0%	16%
Existing Biodiversity Enhancement Areas	18	20%		15			17%
Areas identified in the Regional Opportunities Map	55	63%					
Question ENV11: Do you agree with the list of issues a – i on page 73 that it is suggested Policy QE8 could include?	117	99	10	8	84%	9%	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?	111	93	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?	117	90	15	12	77%	13%	10%

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
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?	103	91	3	9	88%	3%	9%
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?	123						
Option 1: Environment Led	54	44%		16			13%
Option 2: Development Led	18	14%					
Option 3 : Spatial Strategy	35	29%					
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	38	32%		9			8%
Option 2: Adopt Regional Energy Strategy targets for renewable energy	16	14%					
Option 3: Sub-regional targets for renewable energy	52	44%					
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			4			4%
Option 1 - Retain existing Policy EN1	27	23%					
Option 2 -Criteria-based policy	75	64%					
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.	66						
Contribution to the global environment	58						
Contribution to the local economy	60						
Impact of fauna, flora and animal life	60						
Noise	60						

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
Odour	59						
Traffic Implications	59						
Visual Impact	57						
Other factors	35						
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			11			9%
Option 1- Regionally Specific Policy	65	52%					
Option 2- Apply PPG2	48	39%					
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			11			11%
Option 1: Safeguard Key Minerals and Infrastructure	43	43%					
Option 2: Safeguard All Minerals and Key Infrastructure	45	45%					
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?	65	27	35	3	42%	54%	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	39	39	7	46%	46%	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?	65						
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	0	0	4	0%	0%	5%

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
Question M7: Is there a need for a regional safeguarding policy on coal? Please provide reasons (and where possible, evidence) to support your view.	66	33	29	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	31	21	5	54%	37%	9%
Question M9: Do you think that the indicative apportionment outlined in Table 4 on page 106 is realistic?	89	19	62	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?							
Option 1: Apportion future supplies by existing methods	25						
Option 2: Apportion future supplies using different sub regions	4						
Option 3: Apportion future supplies using different sub regions and methods	40						
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	43						
Existing Mineral Infrastructure	39						
Local Resource Availability	41						
Environmental Acceptability and Designations	45						
None of the above	6						
Other (please specify)	12						
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?	61	0	0	61	0%	0%	100%
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?	42						
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						

	No. of responses	Yes:	No:	No option ticked but written response given:	% Yes	% No	% No option ticked but written response
Option 2: Supplies for Individual Brickworks	26						
Option 3: Future Supplies from Resource Areas	3						
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%