

## *General - Other Comments*

### *Response    Response    Other Comments* *Capacity*

Rugby Town  
Centre Company  
Chairman

349 I represent the Rugby Town Centre Company and the Rugby BID Company which are both intricately involved with its partners RBC & WCC in the long term viability and vitality of Rugby Town Centre. We are fundamentally involved in the retail, tourism, cultural and commercial future of our Town centre.

Business

The Tipton &  
Coseley Building  
Society

393 It would have been very helpful to have a page for all the acronyms used rather than having to try to find when they were first used to remind me of what they stood for. The map at the back was difficult to follow due to using shades of one colour. I can understand that this was done for reasons of cost. A section for general comments such as these would have been useful.

Business

Rushton Hickman  
Ltd

532 There is good demand within the West Midlands for residential and commercial property. Currently, we cannot meet all of these demands and opportunities are lost from the area. We therefore support the identification of Burton upon Trent as a sub-regional focus for development.

Business

King Sturge (c/o  
Akzo Nobel UK  
Ltd)

724 E6 - We consider that outside the MUAs employment land should represent a minimum level of provision. The Government is committed to promoting a strong, stable and productive economy that aims to bring jobs and prosperity for all.

Business

Herfordshire &  
Worcs Chamber  
of Commerce

808 The Chamber believes that more should be done to ensure that the basic utilities, especially water and electricity supply, would be available.

Business

***Response Capacity***      ***Response***      ***Other Comments***

Birmingham International Airport Limited

833 It was disappointing, in terms of the section on The Role of the Region's Airports and the issues which consultees should think about when making a response (i.e. "What to Think About"), that the issues were not presented in a more balanced way.

Business

North Staffs Chamber of Commerce & Industry

1156 The North Staffordshire Integrated Economic Development Strategy sets out the vision and strategy for the North Staffordshire conurbation. It was developed by partners and stakeholders "to create an environment where enterprise can flourish, where job and learning opportunities are maximised and where commerce, living and learning activity takes place successfully and competitively". The North Staffordshire Integrated Economic Development Strategy aims to make North Staffordshire the city region of choice for 1 million people by 2021. The Regional Spatial Strategy must support the aims of North Staffordshire Integrated Economic Development Strategy as the policy focus for the North Staffordshire economy.

Business

WBB Minerals

1237 It is not clear how the Phase Two Revisions relate to the overall Regional Spatial strategy published in June 2004. However, of note is that neither document refers to the presence and importance of industrial minerals and in particular Silica Sand within the West Midlands Region, although Aggregates and Energy Minerals are addressed in the RSS.

Business

West Midlands Business Council

1308 Summary of recommendations 1) Direct Government intervention, including via the use of building regulations, to help ensure water supply needs 2) West Midlands Regional Assembly to work with the Environment Agency to consider the impact of the Milton Keynes South Midlands growth area upon the water supply needs of the West Midlands Region 3) Technical work needed on viability of effluent water re-use and potential of water transfer from the canal

Business

***Response***    ***Response***    ***Other Comments***  
***Capacity***

The Theatres Trust                    225    We are disappointed that there is no debate or Spatial Option surrounding cultural activity. Conclusions should be drawn from the Regional Cultural Strategy that highlight the importance of culture.  
 We note the reference to cultural assets on page 44, and were especially pleased to see that 'new and improved cultural facilities' page 45, are identified as an area to focus on as a catalyst for centre regeneration. Culture includes visual arts and music, the performing arts, crafts, museums, libraries, theatre, cinema, sport, tourism, the natural and built environment, as well as creative industries such as advertising, architecture, design, publishing, television and radio, film and video, software and computer services, and antiques.  
 We therefore request that the Arts, Culture and Tourism form a Preferred Option.

Interest Group

West Midlands Regional Woodland & Forestry Forum                    334    On behalf of the West Midlands Regional Woodland & Forestry Forum, we welcome the opportunity to respond to the WMES Policy Choices Consultation. \* Disappointed to see lack of emphasis on the environment, particularly climate change, which despite its widely recognised importance has been relegated to a single question at the end (ref to Stern report). \* The vital role of the environmental economy, green infrastructure in support of sustainable communities, encouraging inward investment and climate change adaptation are under-represented. \* The need to align with other regional strategies and priorities, e.g.. Regional Sustainable Development Framework, Regional Spatial Strategy, Regional Rural Delivery Framework. \* Opportunities for greater use of wood, environmental technologies including wood for energy (ref Wood Energy Strategy; Regional Forestry Framework) for construction and wood

Interest Group

West Mids Forestry Framework                    335    The RSS should highlight the potential for major developments and strategic centres to act as flagship schemes for low carbon design and operation for the region.

Interest Group

Woodlands/Heath Action Group                    422    My main concern is the lack of facilities in Bedworth. We currently have a non-active police station which is open from 9.00am to 5.00pm weekdays and not at all at the weekend. Rumours are rife that the Fire Station will close as well. The town centre is like a ghost town with only card and charity shops. Thousands of new houses have been built over the last 20 years and have definitely not regenerated the town, only led to its decline.

Interest Group

*Response Capacity      Response      Other Comments*

Worcester Forum  
for Older People

423 Could you please tell us when the West Midland Regional Assembly was introduced? It is our information that a referendum on Regional Assemblies, held in the north of England, rejected this method of government. We are applying for this information citing the Freedom of Information Act. The extra strain on old and fragile systems means that submerged pipe work would need to be severely overhauled to cope with the extra demand. The Worcester Royal Hospital has had a huge impact on the people of Worcester, not least because it has 40% less beds. We now have a local situation where we have nearly double the people in the area than fifty years ago, and only 60% of the bed space. If the local population is nearly doubled by 2026, the negative impact will be tremendous. Further to this there are persistent rumours that The Alexandra Hospital in Redditch is to close down. Will there be more schools built to cope with the influx? In 2001 there was a shortage of a thousand places in the local secondary schools. Will the new build houses be in developments large enough to be classed as small villages? Emergency services need to be on the doorstep otherwise they cannot do their job effectively. There is no mention of Government funding to facilitate all these plans. How much is being made available from Central Government? How much will be the local Council Tax burden be on those already resident in the areas earmarked for development? Has anyone done any investigation into the social impact of such large numbers of people and how they would integrate with the existing residents? Your document mentions casinos. The local area does not need a casino. No government should be actively endorsing gambling when they are aware of the serious addiction it causes. All citizens have a duty of care to the more vulnerable in society. No casino.

Interest Group

Shropshire Hills  
Area of  
Outstanding  
Natural Beauty

474 There are a number of issues which the West Midlands AONBs feel should be addressed in the WMRSS more widely than the Phase 2 revision permits,

The WMRSS needs to be stronger and clearer on number of key issues:  
Climate change  
Sustainable living  
Ecological footprint  
The environmental and natural resources

We suggest they should form an overarching policy framework for the whole of the Strategy.

Planning Gain and Green Infrastructure:

All of the housing options outlined in the WMRSS show an increase in numbers and the knock on effect of this on other aspects of the Strategy is rightly discussed. However the associated effects on the environment are not so clearly thought out or presented. AONBs will come under increasing pressure for recreation and tourism and the Strategy needs to outline how this will be dealt with. We suggest that planning gain mechanisms which direct money or resources to the management of AONBs is one possible method and would urge the WMRSS to consider giving some direction on this. Other methods may include a Green Infrastructure Plan for areas such as Cannock Chase or the Wrekin in the Shropshire Hills. Allied to this point is the provision of appropriate infrastructure including adequate public transport.

Interest Group

***Response    Response    Other Comments***  
***Capacity***

Alrewas Conservation Group                      497    I have read your document and found it very difficult to follow. Not the least of the problems is the amount of abbreviations, e.g.. WMRA. I counted at least 29 different abbreviations. I consider that it is undemocratic and dictatorial of the government to force these proposals, put forward by an unelected body, WMRA onto local and county councils. The electorate should have been given a chance to vote if they wished to have WMRA running their affairs. I enclose a letter for each section and separate sheets to try and answer your questions. I was unable to remove these from the book. With the present and growing threat from Global Warming, it is even more important that flood plains are not built on or near to. An area under such a threat is the land North of Alrewas village nr Lichfield. Large scale house or factory building also contributes to global warming.

Interest Group

Warwickshire Rural Community Council                      508    That this is only a partial revision is unfortunate. A complete overhaul is needed alongside a challenge to the assumption that growth is a panacea. There is very little consideration of the rural dimension within the Options Document. This leads to some ridiculous categorisations. For example in the Parking Standards section (page 77) "Poor access" is defined as between 0 and 100 inbound buses, trams and trains in the morning peak period. In many villages you would be lucky to see two buses! The strategy relating to Housing and Employment is similarly lacking in sensitivity to the needs of those living in rural areas. There is reference to sustainability and the need to mitigate the effects of climate change there is little evidence that this aspiration is at the

Interest Group

Forestry Commission                      511    We are disappointed to see low profile and lack of emphasis on the environment, particularly climate change, which despite its widely recognised importance has been relegated to a single question at the end. As noted in the Stern Review: There is still time to avoid the worst impacts of climate change, if we take strong action now. The review goes on: "if we don't act, the overall costs and risks of climate change will be equivalent to losing at least 5% of global GDP each year, now and forever. If a wider range of risks and impacts is taken into account, the estimates of damage could rise to 20% of GDP or more. In contrast, the costs of action - reducing greenhouse gas emissions to avoid the worst impacts of climate change - can be limited to around 1% of global GDP each year. Our actions now and over the coming decades could create risks of major disruption to economic and social activity, on a scale similar to those associated with the great wars and the economic depression of the first half of the 20th Century. And it will be difficult or impossible to reverse these changes." There is a need for better alignment with other regional strategies and priorities Reference such as the Regional Forestry Framework and recently launch Green Infrastructure prospectus. Opportunities for greater use of wood, including sustainable construction, wood for energy and wood recycling should be promoted. The key actions and recommendations in the recently produced Sustainability West Midlands report - Sustainable Housing Action Programme (SHAP) 2006-7 Planning for Sustainable Homes: Meeting the Carbon Challenge should be followed. The need to protect key environmental assets such as Ancient Woodland (RSS QE8). Heating with wood is currently one of, if not the most cost-effective way of reducing a building's carbon footprint for energy use and construction.

Interest Group

*Response Capacity      Response      Other Comments*

Much Wenlock  
Civic Society

515 We must first express our concern that we are not invited to respond to a named person, who can be held to account for incorporating responses to representations. This does not engender confidence that stakeholders have a real role to play. We must also express our concern that the meeting on Tuesday 20th February, billed as being a chance to directly consult stakeholders, seemed instead to have been 'hijacked' by Shropshire County Council. The primary aim of the meeting seemed to be to allow the Shropshire CC to present the consensus view of professionals and elected members. That impression was reinforced first by the knowledge that the PowerPoint display had already been prepared for approval by the Council Cabinet the next day.

Fortunately our very serious dissatisfaction with the process is to some degree tempered by considerable agreement on the principles embodied in the PowerPoint presentation. We particularly applaud the proposed reduction in the housing targets for the Bridgnorth District and equally applaud the increasing focus on the need for more, and a higher proportion of, affordable homes wherever development is permitted. We agree that Bridgnorth District Council faces serious issues arising from the proximity of the West Midlands conurbation. However, we also believe that the Regional Spatial Strategy should specifically recognise equally serious problems deriving from the proximity of the expanding Telford conurbation. We recommend that a new Green Belt be created to ensure protection from overdevelopment of the area surrounding Telford. Providing adequate local recreational land and facilities in non-strategic centres. Providing adequate local recreational land is well provided for within large planned urban areas such as Telford. In smaller settlements it is frequently neglected, as the areas grow slowly through small local developments. The regional role of Much Wenlock in relation to the 2012 Olympics. Regional authorities have already identified Much Wenlock, with its Olympian links and Stratford upon Avon, as the two key sites for the tourist focus in the region in 2012. Those regional partners wishing to offer training facilities for the national teams are already making reference in their literature to their proximity to Much Wenlock, without, incidentally, necessarily having the vaguest idea where Much Wenlock is located. We have no problem with the Region capitalising upon the unique importance of Much Wenlock, as long as the region plays an equally generous role in funding an enhanced local infrastructure to cope with the number of tourists likely to descend upon the town. We urge specific recognition of the RSS of the unique challenge facing Much Wenlock in regard to facilities, traffic and also parking standards. We trust that the draft strategy will be adequately amended to encompass all aspects of this issue.

Interest Group

The Broadway  
Trust

541 We are most concerned that a matter of such importance affecting the long-term future of the county should be allocated only a two-month period for consultation.

Interest Group

The Rowney  
Green  
Association

640 Worcester County Council recognise that Rowney Green is an area of High Landscape Value and Bromsgrove District Council have designated it as a Landscape Protection Area. The network of public footpaths and narrow lanes are well used with walking and riding being very popular pursuits.

Interest Group

***Response Capacity***      ***Response***      ***Other Comments***

The National Trust

661 The review's failure to address known deficiencies in the existing RSS with regard to the environment undermines its ability to contribute to sustainable development.  
 The report considers topics in isolation without presenting coherent options of a spatial strategy for the region.  
 Any review of the Green Belt should consider the potential of and mechanisms for enhancing landscape, habitat, and recreational value.  
 The layout, typography and cartography of the Issues and Options report are unhelpful to users in several ways. Coloured text rather than black on white is harder to read, particularly where decorative shading is applied under the text. The shading and the symbols on the Spatial Strategy Diagram are so poorly differentiated that you can only tell what you are looking at if you already know what it is.

Interest Group

Transport 2000 Herefordshire and Worcestershire

712 We see the need to reduce carbon (and other) adverse output as a key to the development.

Interest Group

The Ramblers Association

810 The present time during which Local Development Frameworks (LDF) are being drawn up is one in which people who wish to preserve the natural environment are only too aware of the contrary policies, or decisions (or lack of them) of the National Government, or the EU, which make it difficult to achieve anything other than to fight a losing battle to preserve what we can of the Worcestershire countryside. In the following sections we put forward the priorities for this as we see them. In general, the Ramblers' Association would wish to protect the countryside to the greatest degree possible, which would imply an ultimate objective of almost all development being redevelopment. Where this is not yet possible we believe that land used for development should follow the rules of the hierarchy of land use as laid out in the Worcestershire County Structure Plan, 1996-2011. Broadly this means a) Re-use of existing buildings b) Re-develop on urban brownfield sites c) Develop on edge of town sites d) Re-develop rural brownfield sites e) Use of land in green belt, AONBs or National Parks should be very little and severely restricted. So despite a commitment to "sustainable development", the Government's automatic response to an imbalance of supply and demand was, therefore, that supply must be increased. Nothing would be done to examine whether demand could or should be reduced. For this reason many of us within the Environment movement have become considerably disillusioned with the whole process of consultation on detail while being ignored on the wider policy issues. However, it is worthwhile looking at the basis of the demand which now follows or at least those components of demand which might have proved susceptible to governmental control had there been the will to exercise any. Sadly most environmental bodies are unlikely to make much mention of population changes as a stimulating factor, since this has become unmentionable in polite society. However, we are facing such environmental disaster as a result of these policies that I have felt compelled to spell out the criticism in this letter, rather than deal with the consultation as we should have done if circumstances had been more normal.

Interest Group

*Response Capacity      Response      Other Comments*

Woodland Trust      913      Woodland creation is a particularly powerful tool in combating climate change, not only via carbon sequestration but also through flood alleviation, soil stabilisation, improving water quality and the provision of shade. It can also provide a useful link with Green Infrastructure planning. Despite - or perhaps because of this - it is disappointing that climate changes is not fully integrated into this Spatial Options document. We look forward to seeing a robust integration of climate change into the core of the Preferred Option as, apart from the welcome reference in the introductory section (p.9) of the Spatial Option document, there is little obvious integration so far in this document. We are disappointed in the lack of consideration of the environmental impacts of the spatial options considered, and we do not accept that this falls within the environmental remit of the Phase 3 Revision. Unless the environmental implications of the spatial options are considered now in this Phase 2 Revision, we cannot see how the document can be seen as a truly sustainable strategy. We are pleased to note the general reference to 'Environmental Implications' in the section on Housing Growth (p.21) but this does not feature in the other three spatial option and neither, as is similarly the case with climate change, is it followed through in any detail. Therefore, in the same way as should be the case for climate change, we would like to see every spatial option choice (and Preferred Option Choice) proofed against its impacts on environmental foot printing. Whilst we are pleased to see the reference in the Housing spatial option to the importance of environmental assets (Environmental Implications, p.21), we are disappointed with the vague distinction between features of 'regional importance' and 'less sensitive assts', and are worried by the comment that 'Some reduction of less sensitive assets may be justified providing appropriate measures are taken to mitigate and/or compensate for any loss'. We are also disappointed that the Environmental Implications text is not repeated for the other three spatial options (employment, waste, transport and accessibility) but appears to relate solely to the housing option. We would therefore like to see the RSS Phase 2 revision Spatial and Preferred Options adopt a firm commitment to protect, conserve and enhance biodiversity, in particular irreplaceable semi-natural habitats such as ancient woodland. We remain concerned that the breakdown of the RSS Review into three phases, with environmental matters relegated to Phase 3, risks the marginalisation of key issues of climate change, environmental capacity and biodiversity in Phase 2. Whilst there are encouraging text references in the Phase 2 Spatial Options document, we are yet to be convinced that these are truly integrated into the four spatial options considered, and we challenge the WM Regionally Assembly to achieve this in the next stage Preferred Option for Phase 2.

Interest Group

West Midlands Friends of the Earth      917      It is essential if we are to become a low carbon economy that we factor in the performance of the buildings we currently live in and those that we are going to build. It will also be essential that we design out poor environmental technologies or at least price them in a way that the pollution is factored into the purchase price thereby directing consumers to purchase the most energy efficient product available. Despite having read the paragraph on page 20 concerning Climate Change, we are very concerned that there is no teeth in terms of policy formulation and its implementation.

Interest Group

***Response***    ***Response***    ***Other Comments***  
***Capacity***

Campaign to  
Protect Rural  
England

923 Unlike most other Regional Spatial Strategies, the West Midlands RSS makes no direct link between the housing options and the proposals for employment land provision, office or retail development. This greatly weakens the strategy.

It seems to us that no attempt has been made to consider or address the relationship between employment and housing provision in particular parts of the region. This is a very serious weakness in the proposals which should be put right in the preferred strategy.

The Sustainability Appraisal concludes that all 3 housing options will have an adverse environmental impact and that the higher the housing numbers the worse that impact will be. In these circumstances, there would need to be robust, evidence-based justification for any strategy with housing provision above that of option 1.

Interest Group

West Midlands  
Regional  
Sustainability  
Forum

927 WMRSF has serious concerns about the lack of consideration of the environmental impact of the options set out in the policy options report and particularly the failure to address climate change issues. The preferred option must adopt clear targets for reductions in greenhouse gas emissions, at least equal to - and preferably greater than - the Government targets of a 20% reduction in CO2 emissions by 2010 and 60% by 2050. It must also set out policies in relation to each policy area, which, taken together, will demonstrably achieve these targets.

A sustainable strategy needs an overarching theme of living within environmental limits and sustainable development. This is a fundamental weakness in the Options Report. An evaluation of the impacts on sustainability and greenhouse gas emission should be an integral part of the house process of selecting the preferred option. It is important that every policy choice is checked against its impacts on Climate Change. However we are concerned that the necessary technical work has not been done to support this process. It is essential that it is addressed before a preferred option is adopted. This evaluation needs to be carried out as a matter of urgency.

The Optional Report does not deal with the effects on landscape, biodiversity and the natural environment generally. It may be that the assumption is that these will be dealt with purely through mitigation. However we believe it is essential that these are fully explored during the development of policy.

As well as seeking to contain the causes of climate change, the RSS policies need to address those impacts on biodiversity where adaptation will still be required, such as the need for species to change their location in response to climate change.

Interest Group

***Response Capacity      Response      Other Comments***

Allesley &  
Coundon Wedge  
Conservation  
Society

1031 A review of "Spatial Options" is in essence a review of the allocation of land within the Region. Land as a resource is both finite and fiercely contested between residential and employment uses, infrastructure and green environment. The Revision document concerns revised options for just two of these uses, residential and employment, without any serious study of the impact on either the green environment or the infrastructure. Coventry is not rich in open space and its green environment is not an expendable asset. Outward migration has left Coventry with a poorly balanced socio-economic mix as affluent families move into the neighbouring towns and villages of Warwickshire.

Interest Group

Policy Panel  
Worcester Civic  
Society

1052 We support the principle of Worcester being a regional sub-focus as set out in the Spatial Strategy.

- Major reservations about the housing numbers allocated to the City.
- Severe over-development of the City.
- All 3 Options are reviewed.
- The sole focus on Worcester City must be reviewed; dispersal of housing along key transport and employment corridors.
- Some further dispersal around village locations.
- Both the River Severn and the M5 Motorway represent barriers to the growth of the City - must consider movements across these.
- It should be at the discretion of the Local Planning Authority to set affordability thresholds - a threshold of 40% affordable housing on all but the smallest of developments would go a long way.
- Develop more affordable property through the provision of cheap or freely given public land.
- Further growth without significant accompanying infrastructure investment would severely undermine the quality of life within the City.
- The provision of these in tandem with any housing growth is essential to maintain and enhance the quality of life for citizens in the City.
- Without balanced employment site allocation - becoming merely a dormitory settlement. The result - affordability problem in the City; High level of commuting out of the City.
- Much greater emphasis must be placed on reviving and enhancing Worcester's economy before further significant housing growth takes place.
- Undermine sustainability principles.
- New residential and employment development to reduce car commuting.
- Option 1 - significant challenges to deliver this Option as there is the need for infrastructure investment.

Interest Group

***Response***    ***Response***    ***Other Comments***  
***Capacity***

West Midlands  
Geodiversity  
Partnership

- 1057 It is important to West Midlands Geodiversity Partnership that an over-riding principle be applied in the review of housing, waste and transport.
- Geodiversity Action Plan should be seen as a significant element in the West Midlands Regional Spatial Strategy.
- As a resource these records are priceless and the bodies responsible for them should be supported within the RSS.
- The RSS should incorporate for co-operative consultation in Waste Development Frameworks to ensure the interests of Geodiversity are safeguarded.
- The RSS should take account of the need to protect all designated and significant Geodiversity sites, buildings and structures.

Interest Group

Acocks Green  
Focus Group

- 1061 Overall we are concerned that the issues of climate change and sustainability are not at the centre of this review.

Interest Group

Residents  
Against Shottery  
Expansion

- 1063 Not enough attention has been given to flood risk when Stratford is considered. Substantial parts of the town and surrounding areas are subject to flooding.  
More buildings and metalled roads will exacerbate the problem.

Interest Group

***Response***    ***Response***    ***Other Comments***  
***Capacity***

The Black  
Country  
Geodiversity  
Partnership

1069 The development of housing, transport, waste and employment options could directly affect the geological resource through loss of exposure in the natural environment but also may have consequences for Geodiversity and heritage within the historic built environment. It is essential that policies require better quality schemes to protect and enhance the natural and built environment and to have special regard to quality of life and the role of pride of place. Opportunities to enhance the geological resource should also be encouraged as a matter of routine. New and old quarries offer some of the most significant examples of the regional geological resource so we would welcome the opportunity to comment on specific schemes for mineral permissions/conditions or landfill operations and their subsequent restoration schemes. Integrating Geodiversity within the transport, housing, employment and waste policies will make a significant and sustainable contribution to and endorsement of the principles of Urban and Rural Renaissance. Historically Geodiversity has characterized the Black Country and can still have a defining role in local distinctiveness and neighbourhood character. The Geodiversity of the Black Country and the wider region is of international and scientific importance and for the future has implications for the Visitor Economy, in

Interest Group

Birmingham  
Friends of the  
Earth

1115 Whilst Phase 2 set out to accommodate Climate Change, it appears no to have taken account of it. Where is the acknowledgement of Climate Change, resource scarcity - and where is the loss of business to the Region to be funded? Air T travel for tourism, likely to be the bulk of BIA's traffic, takes money out.

Interest Group

Regional  
Environment  
Partnership

1206 It is recommended that the RSS should develop and include a cross cutting policy to address climate change and that the sustainability appraisal process of the preferred option should develop and carry out a form of climate change proofing integral to the SA process agreed by the SA/SEA Steering Group. In particular, the use of policy in the preferred option to reduce carbon emissions so that all new development aspires to the Government target to be zero carbon by 2016. The Partnership continues to support the urban renaissance strategy of the current RSS, in particular to continue the investment to bring forward derelict and Brownfield land as a priority in the MUAs. But it is also recognised that at the higher spatial options, if chosen, there will be greater pressure on growth outside the MUAs.

Interest Group

***Response***    ***Response***    ***Other Comments***  
***Capacity***

Vision 21 -  
Malvern Hills  
Partnership

1225 Vision 21 has seen the joint response to the consultation being made by Malvern Hills District, Wychavon District and Worcester City Councils. The Partnership strongly supports the comments made in their joint response. The RSS should take a far more robust view regarding existing and reducing carbon emissions within the region and do more to ensure significant reductions. As such, all new proposals need to be assessed for their impact on the region's carbon footprint. Issues such as sustainable transportation opportunities, changes in work place and working, and the ways in which communities access services are not adequately addressed. Vision 21 is concerned, with the South Worcestershire authorities, how little consideration is given to the necessary infrastructure around the proposed development. This includes the provision of schools and health services. The communications network of this areas is already inadequate. We would ask for a far more innovative approach to meeting transport needs.

Interest Group

St. Mark's Church  
Bilton

1300 Lastly, it may well be that the Assembly needs to re-examine its approach with the fresh priorities now facing us all:  
- Seeking carbon neutral development so far as possible.  
- Minimising traffic, especially to and from work.  
- Nurturing strong communities by consulting all concerned with sport, health, education, culture, places of worship and community amenities for young and

Interest Group

Worcester City  
Civic Society

1310 The Society is concerned that further growth without significant accompanying infrastructure investment would severely undermine the quality of life within the City. We are not against growth, however we believe that it has not been handled well in the past, with new housing development lacking key amenities and being insufficiently integrated into the existing City.

Finally, the Civic Society believe that the Options for growth outlined in the WMRSS represent a threat to the environment of the City and its surrounding land, and also could serve to undermine sustainability principles. It is unfortunate that consideration of environmental issues in the Region will follow after discussions about development - these should go hand-in-hand.

Interest Group

***Response***    ***Response***    ***Other Comments***  
***Capacity***

Campaign to  
Protect Rural  
England

7271 There has been an increasing trend in recent years for houses to be left empty. Many houses have been bought for speculation, rather than occupation and many bought for rental are unoccupied for long periods. We are doubtful whether this has been adequately taken into account and consider that it warrants investigation and even legislation to prevent it occurring.

It is important to retain the largely agricultural basis within Worcestershire and other counties of the SW Midlands as it is becoming increasingly evident that we cannot meet the growing demands for food and water from the large urban areas of the Midlands and SE England. Importing more food from overseas, much of it by air, is not sustainable, depletes energy resources and generates more carbon dioxide emissions.

The water supply is on the verge of becoming inadequate to meet household and industrial demands in SE England and parts of the Midlands, and any diversion of the supply from agricultural usage will threaten crop production. It is important that the good quality agricultural land is not built on but this will be unavoidable if the final preferred Option lies toward the higher end of the current three Options.

Interest Group

Offenham Parish  
Council

156 Local & regional services and infrastructure has historically been inadequate and continues to fail to meet the needs of the existing communities in all areas.

LA/Partnerships

Ingestre with  
Tixall Parish  
Council

157 We are also very concerned that the current green corridor between the Black Country and The Potteries should be preserved, and not be allowed to become a single massive conurbation.

We believe that open countryside is an irreplaceable asset which makes an invaluable contribution to the health and welfare of local residents, as well as attracting tourists and thus adding to the local economy.

LA/Partnerships



***Response Capacity***      ***Response***      ***Other Comments***

Rushwick Parish Council

337 The figure of new housing for Malvern Hills under option 2 is 6,300. Assuming two working adults and two cars per dwelling, we have a total of 12,000 plus in each case. These increases will strain an already overloaded infrastructure and public services such as schools and hospitals. The parking problem grows more acute by the month.

LA/Partnerships

White Ladies Aston Parish Council

340 We endorse the sentiments set out in the WMRSS Vision and especially the comment referring to "Without prejudicing the quality of life of future generations". We are especially pleased with this comment bearing in mind that Worcestershire has signed up to a Climate Change Pledge 2006. However, we are concerned about your statement "some of these relate to: jobs, protection of the environment or meeting peoples needs for.." Under the heading "What are Spatial Options". We believe that the environment must come first and thus be able to meet peoples needs in the future. Climate change - we are delighted that the WMRSS has noted the concerns and believe that there is a genuine desire at Regional level to promote the right environmental conditions. We therefore trust that the West Midlands as a whole should suggest that Government re-assesses the housing and employment figures bearing in mind very recent scientific concerns. If planned correctly, a Spatial Strategy should be adaptable enough to alter if and when needed. It should not be a document set in stone but should allow flexibility throughout the Region to adapt to environmental issues. We therefore endorse the statement "Growth should avoid exceeding any thresholds beyond which irreversible decline in environmental assets is triggered". We note that there is a reference to inadequate future supplies of water to cope with the increased housing numbers and employment requirements. The overall impression of this latest document is that there has been no allowance at all for infrastructure and that the Phased Revision is totally out of kilter. We fail to understand why minerals is not included in this second important phase bearing in mind that it is minerals that create all the aggregates for road construction, housing and ballast for the much needed railways. We would like the Region to ask the Government to introduce legislation which would enforce developers of residential, commercial and industrial structures to include green build such as internal recycling facilities, solar panels, water conservation, etc. The technology is out there and has been for many years now. There is absolutely no excuse. The following are our basic concerns when reviewing the proposed three Options:- \* Lack of infrastructure \* Concern over highways \* Where is a Haulage policy? \* Concern over future water supplies \* Not including Minerals policy in this section \* Total destruction of the countryside - a vital food supply source and should not be regarded as either a building site or a recreational area. \* Paucity at lack of public consultation throughout the Midlands. We therefore question the legality of this entire process as the proposals will be carried through without Community involvement or even awareness.

We would request that Region should protect its own area and return these proposals to Government. We suggest that Region should ask Government to set a more realistic set of numbers that are more environmentally viable and more acceptable to the present global concerns.

LA/Partnerships

***Response Capacity      Response      Other Comments***

Solihull  
Metropolitan  
Borough Council

358 I would stress:  
The need for the RSS Revision process to focus on matters of truly regional significance and not to unnecessarily stray into areas of concern or policy making that can reasonably be left to local discretion.  
That the designation of Major Urban Areas whilst a useful tool of regional policy, gives rise to problems at the local level of applied in doctrinaire, inflexible and overly prescriptive manner.

LA/Partnerships

Northamptonshire  
County Council

385 There is not a clear exposition of the strategic options for the region particularly through the use of schematic maps and diagrams to explore its options that could perhaps be expected.  
  
In relation to cross-border relationships with the West Midlands MKSM is in the EAST MIDLANDS region; the cross border issues you have with the SE are more around relationships with Banbury and Oxford/Central Oxfordshire.

LA/Partnerships

Herefordshire  
Council

418 \* It is important that the RSS revision is fully aligned with the development of the Regional Economic Strategy.  
\* In setting targets within the RSS revision any figures (for example for housing completions employment land or office etc) should be justified by clear and demonstrable evidence.  
\* In developing the preferred option, the particular needs of rural areas should be properly addressed.  
\* The Spatial Options should also ensure that the impacts of the various growth levels on climate change should be explicitly considered.

LA/Partnerships

***Response Capacity***      ***Response***      ***Other Comments***

Worcestershire  
County Council

479 The potential impact of the proposed revision options on Climate Change issues has not been seriously or satisfactorily addressed within the revision report.

The revision report offers nothing in terms of the ability to provide for and fund the development of sustainable balanced communities. It will be essential that the Preferred Option not just addresses the levels of housing growth required but that it also is clear on how development will be balanced with both employment and necessary community facilities such as schools/community/health facilities.

A key question in relation to this will be how infrastructure and community facilities are to be funded and what will be the mechanisms to secure the funding given that much of it (especially infrastructure) will be required well in advance of any housing development. It must give clear guidance on this element and establish how, (where appropriate) the financial implications of the Preferred Option will be integrated into national funding schemes.

Option One: this requires a provision of 31,100 dwellings in Worcestershire over the period 2001-2026 and is a continuation of the existing WMRSS. Demand for housing growth to meet the County's natural increase in household over the same period is 31,813 and Option One would therefore result in some local need not being met. The distribution of the dwellings between the Districts would mean that both Redditch and Worcester would fall short of being able to provide for their own naturally generated growth (substantially so in Redditch). Worcester City would be adversely affected in terms of maintaining its role as the County town and in developing its role as a sub regional focus for development and as a New Growth Point. It is also probable that the level of growth would be insufficient to meet the affordable housing needs of the County.

At the regional level, the scale of growth required under Option Two provides a greater opportunity to meet the regional level of demand indicated by the 2003-based projections. However, the distribution of the household growth between the MUAs and other parts of the Region does not accord with the current WMRSS target that for every ten new houses built in the conurbation by 2021, only seven new houses would be built elsewhere in the Region (1:0.7). The Sustainability Appraisal comments that by 2026 under Option Two for every ten houses constructed within the MUAs, 9.92 houses would be constructed elsewhere. This is clearly a substantial change in the balance of new development between the MUA, and other parts of the Region envisaged within the current WMRSS and as such will reduce the ability regionally to slow down and stem the decentralisation of population from the MUAs, a key principle of the current WMRSS.

It will only be possible to improve the balance of development if more urban capacity can be found within the MUAs.

Preparation of the Preferred Option for the Region must take into account the potential impact of the option on Climate Change issues as a matter of

LA/Partnerships

***Response Capacity***      ***Response***      ***Other Comments***

Warwickshire  
County Council

512 The WMRA's identification of Leamington town centre at the 3rd level of centre for retail development (i.e.. 30,000m2) and Nuneaton and Rugby town centres at levels 4/5 (i.e.. 20,000m2) does not reflect the housing growth options. In particular, growth of Rugby and Nuneaton at housing option 3 levels would inevitably require retail growth that would require retail floor space growth of their town centres to at least the level of tier 3 centres, alongside

LA/Partnerships

Kenswick and  
Wichenford  
Parish Council

514 Regeneration of city/town centres should always be the priority instead of creating new centres on Greenfield sites. It is easier to improve existing infrastructure, than to create from scratch.  
All future development should be allied to future restrictions and tighter control on immigration.  
Local authorities should be building to meet local needs and not giving in to government demands.

LA/Partnerships

Norton-Juxta-  
Kempsey Parish  
Council

540 Overall the strategy acknowledges the importance of sustainability but there is a finite quantity of land which has been continually depleted over the years by development and to propose that development rates be again increased particularly in this area using up an ever shrinking unrennewable resource is obviously the pinnacle of unsustainability.  
Also widespread dissatisfaction by the comparatively few people that have been made aware of the report that such an important and far reaching strategy document is being produced by a completely unelected body. This is not democracy.

LA/Partnerships

Lower Broadheath  
Parish Council

648 The success of any of the proposals is dependent on the necessary infrastructure being put in place before an expansion of Worcester City or the suggested growth of Malvern Hill is commenced; without an assurance that this will be provided none of the options could be supported.

Climate change.

Any increase in population will result in an increase in carbon emissions simply because of the proposed increase in the number of new homes and commercial developments. Local employment opportunities are therefore essential to avoid the need to travel long distances as any form of transport will add to carbon emissions. High efficient insulation, recycling and heating system will also be needed and development on flood plains should be avoided.

LA/Partnerships

***Response Capacity***      ***Response***      ***Other Comments***

West Midlands  
Regional Health  
Partnership

664 The RSS is seen as integral to the Regional Health Strategy (RHS).  
There has been a review of health in the West Midlands, which provides a geographical overview of health inequalities. At more local level, there are more detailed analyses of inequalities and health need which will be important to take account of in the assessment and implementation of the RSS options. The emphasis on urban regeneration needs to be supported.  
Given the local focus of primary care, and the lead time required, it will be important to ensure that the health and social care sector is involved at an early stage in relation to identifying housing market areas and changes in population structures so that they can plan for change.  
The West Midlands has a comparative advantage as regards clinical and academic excellence and a large and diverse population. This is enhanced by the growth potential surrounding the massive investment in New Hospital across the region. Consequently, sufficient land must be allocated for medical technology purposes across the region, especially in the Technology Corridors.  
The housing and other development need to take account both of the environmental implications, and to maximise the opportunities for health.

LA/Partnerships

Cheshire County  
Council

731 It is encouraging to see the reference in the Spatial Options to the willingness of the West Midlands Regional Assembly to be involved in work relating to the commitment to consider Crewe's relationship to the North Staffordshire conurbation as part of a future WMRSS Revision.

LA/Partnerships

Stock and  
Bradley Parish  
Council

792 What is the point of the government asking for our considered and time consuming opinions if our efforts are to be so blatantly disregarded and dismissed?

LA/Partnerships

**Response**    **Response**    **Other Comments**  
**Capacity**

Staffordshire County Council	<p>837 The consultation document fails to present an integrated/holistic appreciation of the matters covered in Phase Two. Links between housing provision, employment requirements, retail and office requirements and general infrastructure provision, including consequential transportation requirements are not shown. This must be remedied in the presentation of the preferred option.</p> <p>E4 - Subject to the above comments, a five year reservoir is considered adequate, with the level of the reservoir based upon an average of development levels over a ten year period.</p> <p>E5 - Any figures should be regarded purely as guidelines for detailed assessment by individual local authorities.</p> <p>E6 - Given the levels of development that may be required to meet development requirements beyond option one, it is considered that discussion of maximum and minimum development levels is increasingly redundant and will act to potentially limit development opportunities within the region to the detriment of the regional economy. Any figures should be regarded purely as guidelines pending the production of local economic and employment land reviews when a more detailed thorough analysis of local economic conditions and requirements can be undertaken and a supply of land be defined and allocated which is responsive to local circumstances. It is not considered that such an approach would benefit from or would necessitate the setting of maxima or minima figures.</p> <p>E8 - The list of potential criteria is considered useful in bringing a needed level of flexibility to the suggested trend based approach, additional local factors such as changing economic structure, employment land losses, commuting levels, quality of existing provision, quality of existing jobs, cluster priorities and impact of local regeneration area status also needs to be taken into account and is better development through a local review as promoted above.</p> <p>RL1 - There is a substantial reservoir of employment land supply across Staffordshire with permission for use classes including B8 amounting to over 900 has. Much of recent employment land development across the county has comprised B8 development as highlighted in the Regional Logistics Case Study. The County Council and the Staffordshire local authorities do not wish to see their economies dependent on one sector of the economy and therefore would not wish to see one (or more) RLSs located in the county. Indeed Staffordshire authorities would wish to assess the locally appropriate level of provision for B8 use within the above mentioned detailed analysis. Operators currently present in the county are already experiencing operation difficulties particularly related to the available workforce.</p>
LA/Partnerships	
Warndon Parish Council	<p>852 It is acknowledged that the water resources will not be able to meet the increase required by both the housing and employment proposals.</p>
LA/Partnerships	
Upton Warren Parish Council	<p>866 There are two general hospitals in the county neither of which can sustain the health needs of the existing population without the anticipated additional population the proposed new strategy would entail.</p> <p>Schools can only cope with the existing population and would be completely inadequate with the kind of additional population proposed by the new strategy.</p>
LA/Partnerships	

**Response**    **Response**    **Other Comments**  
**Capacity**

Creswell Parish  
Council

868 As a general comment, addressing this as a member of the public/layperson, just reading the 3 page introduction with its 10 external references to other documents is extremely daunting if not, to be blunt, completely off-putting!  
Sustainability Appraisal - a further two external references.  
Contexts - yet another 5 references.  
One more reference for each of the 5 neighbouring Regions.  
And a final one reference within the "Key findings from Monitoring" section.

Only then, assuming anyone has stayed the course, does one even get to the beginning of the document proper.  
Quite how any lay person - and in that category I would include almost all Parish Councillors and indeed, speaking personally, their Clerk - is to be expected to pursue all (any) of that background investigation simply in order to even being to comprehend what is being asked of them has to be a matter of general concern. We, as a Parish Council certainly feel very isolated and vulnerable in this regard. In our opinion, it really is a near impossible "ask".

From the standpoint of H.M. Government, we understand that both they and yourselves are supposedly encouraging "public involvement" but this surely is not, cannot be, the way.

We would therefore suggest that this is an important issue that should be given the fullest and most urgent attention if this and future, similar Consultations are to achieve the level of involvement and thus genuine 'credibility' and wider public 'acceptability' that it requires.

We suggest that an appropriate analysis of just who - people and not just organisations, big businesses or other vested interests - have actually been able to engage in this Consultation and (successfully) respond to it.

There seems little inter-relationship(s) shown or brought out between the different areas/Districts of the Region and of their very natural inter-dependency one with another.

LA/Partnerships

Parish of the  
Sacred Heart

932 We urge WMRA to re-examine its approach, seeking carbon neutral development as far as possible.  
Minimising traffic, especially to and from work  
nurturing strong communities by consulting all concerned with sport, health, education, culture, places of worship and community amenities for young and

LA/Partnerships

***Response Capacity***      ***Response***      ***Other Comments***

West Midlands  
County Leader  
and CEO Group

945 The RSS needs to provide a strategic policy framework to guide sub-regional strategies and LDF where appropriate. It should avoid setting policy in areas where a sub-regional or local approach would be more effective.

LA/Partnerships

Balsall Parish  
Council

958 Balsall Parish Council would suggest:  
 1. That infrastructure issues must be an integral part of all strategic decision making processes at local and strategic levels.  
 2. That no major changes involving housing or employment developments should be undertaken without an audit of infrastructure capacity sanctioning the change  
 3. An independent assessment of the value to the Region of the expansion of Birmingham Airport should be undertaken, that assessment to cover environmental issues as well as economic matters.

LA/Partnerships

Solihull  
Metropolitan  
Borough Council

1146 The need for the RSS Revision process to focus on matters of truly regionally significance and not to unnecessarily stray into areas of concern or policy making that can be reasonably left to local discretion.  
 That the designation of Major Urban Areas, whilst a useful tool of regional policy, gives rise to problems at the local level if applied in doctrinaire, inflexible and overly prescriptive manner.

LA/Partnerships

***Response Capacity      Response      Other Comments***

Oswestry Borough Council      1154      The council strongly supports Option 2 in relation to regional housing distribution. The need to increase the supply of affordable housing in the Borough is a key factor in this respect,.

The Council objects to the methodology used to determine future employment land requirements. An alternative approach using Shropshire County Council data is sought.

The A483 Pant/Ilanymynech By-Pass and the dualling of the A5 trunk Road between Shrewsbury and Oswestry are integral to the RSS rural renaissance objectives and should receive appropriate priority in the RSS

LA/Partnerships

Saleway Parish Council      1222      We are not happy with the way in which the consultation process is being carried out; we believe that there should be greater public involvement for such important land use decisions and that the consultation should not be limited to statutory consultees.

LA/Partnerships

Bromsgrove District Council      1260      the environmental implications of both Option 2 and 3 are clearly significant, the undeveloped nature of large parts of Bromsgrove means there are many areas of environmental importance.

LA/Partnerships

South Worcestershire Authorities      1262      The method of consultation has been particularly poor. The West Midlands Regional Assembly has failed to engage the public interest through the lack of Regional Assembly involvement at local level.  
The spatial options consultation suffers from a number of SIGNIFICANT OMISSIONS. It is essential that the RSS review addresses these omissions in order to enable subsequent Development Plan Documents (DPDs) to develop effective policies and proposals as a means of bringing forward key

LA/Partnerships

***Response Capacity***      ***Response***      ***Other Comments***

Balsall Parish  
Council

1286 The continuing increase in infill housing development further exacerbates the drainage problems in the village.

LA/Partnerships

Worcestershire  
Primary Care  
Trust

1304 it is a little disingenuous of the RSS to suggest, on page 21, paragraph 8, Communities that the range of new and improved social, health and community facilities will mainly have to come from Section 106 agreements or the Planning Gain Supplement. There has been a considerable reluctance on the part of planners and developers alike to fund NHS infrastructure costs incurred as a result of significant housing developments. This reluctance is in part due to the increasing pressure being placed by LDFs on Section 106 agreements to fund transport, public open space, public artwork, community centres and so on. The RSS therefore cannot rely upon Section 106 agreements to fund NHS capital development costs arising from its policies on the spatial distribution of new households. If the prevailing healthcare policies are maintained, then the impact of additional households in Worcestershire should be experienced in the main in primary health and social care. Local community hospitals or their successors, General Practice staff, community nurses like District Nurses and specialist nurse advisors, therapists and health and home care assistants will need significant additional resources in order to meet the burgeoning need. But there are also implications for increased pressure on the acute hospital sector.

LA/Partnerships

West Midlands  
Regional  
Transport  
Partnership  
LA/Partnerships

1347 The RTP welcomes the inclusion of Climate Change in RSS Phase 2.

Yorkshire  
Forward

28 We do not have any specific comments to make on the West Midlands Regional Spatial Strategy.

Other - please  
specify

**Response**    **Response**    **Other Comments**  
**Capacity**

Government  
Office for the  
West Midlands

- 587 Climate Change: The consultation draft PPS supplement reinforces the importance of climate change to the government and we appreciate that the Assembly also recognises that very high priority needs to be given to it. In working towards the Preferred Option climate change issues must be a constant consideration. Indeed, if the Region is serious about leading the field on this issue we might expect some policies which really push the Region towards carbon neutrality.
- Gypsies and Travellers: We are concerned that the regional statement referred to in David Smith's letter of 23 August 2006 to Yvette Cooper will not go as far as you could at this stage given the amount of information which is becoming available. We would like to discuss further the form of policy you intend to develop from the interim statement and the scope for incorporating this in Phase 2.
- Links with RES review: When the delay to the revision programme was accepted, you assured us that this would improve integration with the RES review. The current consultation does not have strong links, yet over the coming six months, as the RES review comes to a conclusion in parallel with the Preferred Option the effectiveness of your processes will be crucial. There are clearly potential tensions and we would appreciate some reassurance that you have appropriate mechanisms in place to deal with the potential risks.
- Continuous engagement: We appreciate that you will now be moving very quickly towards the Preferred Option. This will involve a considerable amount of work. However, there are a number of potentially contentious issues which have not been fully exposed as part of this consultation. It will therefore be very important to maintain a high level of engagement throughout the process to ensure issues are fully exposed and discussed prior to inclusion in the submission document.
- Climate change is happening now and the RSS has a key role mitigating and adapting to this. The Government is currently consulting on a PPS supplement for Planning and Climate Change which sets out the planning framework for dealing with the issues. Climate change is a cross-cutting issue which must be a consideration across all aspects of the Phase 2 RSS revision.
- A regionally specific policy is suggested.
- Re climate change: Travel issues are clearly important but there are many others, for example opportunities to draw energy supplies from more efficient means of energy supply including renewable and other low-carbon energy sources. Scale of development may also be important in delivering viable alternatives. You may wish to consider the use of Regional targets in relation to climate change, for example for renewable energy.
- You should explore the potential to make links between new development and existing development in order to maximise the opportunities to improve the Region's carbon performance. We would expect you to explore the locations for development in terms of their vulnerability to climate change and to avoid those which are most vulnerable.
- We are aware that you are working on updating the existing monitoring framework for the RSS. We are however concerned that this was not mentioned or included in the Spatial Options document. We consider you will need to undertake further engagement with key stakeholders to inform your choice of targets for the Preferred Option. We would also expect to see the appraisal of options clearly linked to the full range of environmental implications of where

Other - please  
specify

***Response***    ***Response***    ***Other Comments***  
***Capacity***

Member of  
Parliament

680 the provision of appropriate infrastructure must be fully integrated with any plans for housing growth. This means road and rail infrastructure - as well as schools, hospitals and other local services. I do not believe there is any realistic prospect of securing funding for the necessary infrastructure for options 2 or 3.  
 The real worry is whether Worcester city can cope now, even without all these extra people.  
 Our train services are crowded and unreliable. There are many road and junction improvements which are needed already.  
 New home building at the levels foreseen in this document would be simply impossible without major improvements.  
 The proposals suggested under option 1, perhaps with a modest addition, would be acceptable with fine tuning and a firm and unbreakable commitment to

Other - please  
specify

Mid  
Worcestershire

816 The proposed Regional Spatial Strategy revision lacks intellectual or democratic credentials and needs an urgent overhaul. A fresh consultation should be conducted presenting the case for a range of options between Option 1 and 2, together with detailed funding proposals for the supporting infrastructure improvements.

Other - please  
specify

Coventry South

831 Green Belt and Green Space are important issues. Green Space is less easy to define, but it is significant in the more densely populated parts of my constituency (Binley and Willenhall, St Michaels and Canley), where car ownership is low.

Other - please  
specify

***Response Capacity***      ***Response***      ***Other Comments***

Environment Agency

1017 We have carried out a water resource study that modelled the impact of the 3 housing options on the water balance in Water Company Water Resource Zones. The study shows that current water company plans are based on much lower housing figures than even the lowest RSS growth option. The study also shows that all the growth options will put 4 of the 8 water resource zones into headroom deficit earlier than current projections based on the housing levels in water company plans. All the options will increase demand for water resulting in the need to develop new resources earlier than identified in the current Water Resource Plan. Plans need to be developed early if there is to be sufficient time to build the necessary water infrastructure at both a regional and local scale.

There is a need to align Water Company plans with the RSS so that new waste infrastructure can be planned and developed in line with housing growth.

All three options have the potential to put more people, property and infrastructure at risk of flooding. Worcester is identified for significant expansion in option 2 and 3, yet large amounts of the remaining greenfield land in the city lies within the floodplain. It is important that the Regional Flood Risk Appraisal addresses whether the proposed housing allocations for specific areas are sustainable in terms of flood risk. However, extra housing does not necessarily mean greater flood risk but the locations of these new developments needs to be carefully assessed.

All the options propose an increase in housing over the current RS. This will inevitably put pressure on the water environment.

Despite the West Midlands having relatively low percentage of land (about 8%) in Flood Zones 2 and 3 flooding is a significant issue in several of the towns identified as regional foci.

Even in areas with flood defences such Burton upon Trent there remains a residual risk of flooding in extreme weather events or as a result of defence failure. It is important that areas identified for growth have sufficient sites outside the flood plain.

Any new sites should not compromise flood plain storage, increase the demand for new defences or increase flood risk further down stream.

Other - please specify

Advantage West Midlands

1076 The consultation appears to seek views on housing growth/number in isolation, without reconciling other critical matters that run alongside this debate, such as likely impacts on infrastructure. Advantage West Midlands believes that there must be a clearer understanding of how housing growth and distribution affects the economy, accessibility and essential services in the draft Phase 2 Revision, as part of a truly spatial approach to the review.

Other - please specify

***Response Capacity      Response      Other Comments***

English Heritage      1141      Our concern with regards to the phasing of the review are in part reflected in the limited and inconsistent consideration of the environmental implications of the Spatial Options as an integral part of the consultation document. Notwithstanding the Sustainability Appraisal and the background technical report on the Infrastructure Implications of the Housing Options, the potential environmental implications of the options are poorly drawn out in the consultation document. As a result it fails to present or facilitate a holistic understanding of the choices and challenges confronting the region.

Climate change has the potential to seriously damage the historic environment and to impair future generations' enjoyment of their culture heritage. We therefore welcome commitments to reduce the greenhouse gas emissions, and we support measures to reduce fossil fuel consumption, increase fuel efficiency and exploit renewable energy sources.

Other - please specify

East Midlands Regional Assembly      1158      The Peak District National Park represents a major environmental and recreational asset serving both regions and extends into the West Midlands. The East Midlands Regional Assembly is the designated Regional Planning Body for the whole of the Park, it is important that the needs and priorities of the Park are also appropriately reflected in the final West Midlands RSS. This should include adequate consideration of cross Pennine transport issues and the need to reduce mineral extraction in the Park in line with policies in the Draft East Midlands Regional Plan.

Other - please specify

**Response**    **Response**    **Other Comments**  
**Capacity**

Highways  
Agency

- 1251 The Agency's involvement in the spatial planning process is set against a policy background that wherever possible seeks alternative solutions to building new roads, by reducing the impact of road users on each other and the environment, improving road performance through better network management and making smarter journey choices easier.
- The Preferred Option should be based on a robust and credible transport evidence base which critically examines the implications for the SRN of the future distribution of housing growth and economic activity within the West Midlands Region.
- Having considered the scope and nature of the transport technical work already available, the Highways Agency consider that there may be a need for further work to assess in more detail the transport and highways implications arising from:
- the alternative spatial options for accommodating the region's future housing needs including the proposed New Growth Points;
  - the re-assessment of the region's strategic employment land designations and allocations;
  - the identification of the number and broad location of regional warehousing and distribution facilities;
  - further large scale development in the region's strategic network of centres;
  - changing patterns of waste management
  - the identification of different broad locations for Strategic Park and Ride sites;
  - proposals for the expansion of the region's airports.

Other - please  
specify

Institution of Civil  
Engineers

- 245 The rural nature of much of the West Midlands means that there is potential biomass production and its use as an energy fuel. Robust targets for energy efficiency and carbon footprint reduction will be required for new housing.
- Sustained actions are needed to encourage change from the car. This would include provision of cycle lanes and storage, and pedestrian friendly measures. These would go at new housing developments, employment and logistic sites, transport facilities.
- Effluent water reuse is still a relatively untapped way of providing drinking water to meet growing long term needs. The potential for water transfer using the canal network should be examined further.
- The planning process for new infrastructure needs to be speeded up, with clearer policies that avoid conflict for essential services - transport, flood protection, waste disposal, and energy supply - and which reduce the risk borne by investors in those new facilities.

Professional

***Response Capacity      Response      Other Comments***

Defence Estates  
Operations North

392 Many MOD facilities make a significant contribution to local economies and nearby communities.

Professional

Entec on behalf  
of Europa Way  
Consortium

764 E4 - Where significant new housing growth is proposed, due to the fact that the time taken to bring forward and deliver employment land is often longer than encountered for housing, we believe that the reservoir should cover a period of 10 years to ensure that an appropriate portfolio of readily available employment sites is maintained. We are concerned that under a 5 years supply reservoir not enough choice of sites may be on offer to the market.

E5 - Employment land requirements for the MUAs and areas outside the MUAs should accord with requirements for housing supply. That said, careful consideration needs to be taken of existing employment land supply (and demand) within each district before introducing any maximum or minimum figures.

Professional

Hickman  
Stanmore C/O  
Stansgate  
Planning

805 We consider that out of centre offices will remain necessary, but in the first instance developers should consider town and city centres as appropriate for new office development, in accordance with the sequential approach set out in PPS6.

Professional

IKEA C/O  
Firstplan

845 It would be appropriate for the Regional Spatial Strategy to recognise the important role that IKEA can play in the regeneration of specific sites and centres and frame the policies contained within the Strategic Centres chapter to accord with the policy guidance contained within PPS6.

Professional

***Response***    ***Response***    ***Other Comments***  
***Capacity***

Holmes Antill                      846    It is now more important than ever to ensure that major development sites are sustainable and that they address matters of climate change and CO2 emissions.  
 To this end, the RSS should take the lead and encourage a mixing of uses, which on RIS should include hotels, minor retail uses, crèches, health and fitness facilities, restaurant and even housing.  
 The regional approach to new development should therefore focus on the opportunities to reduce the regions carbon footprint, through a studied and sophisticated approach to development, involving a mix of land uses whilst not shying away from those significant economic and environmental benefits

Professional

Lafarge  
 Aggregates Ltd.  
 c/o Chartered  
 Surveyors                      886    Finally we note that the draft Spatial Options consider the locations of waste facilities, however we can find no reference to the location of allocation of mineral resources within the document. As you are aware MPS1 stipulates in both policy and practice guides that Regional Planning Boards (RPB's) should take into account the distribution and quantum's of mineral resources.

Professional

Severn Trent  
 Water Ltd                      964    We are disappointed that the West Midlands draft RSS does not explicitly consider the issues around water and sewerage service provision that arise from the spatial options being considered.  
 We believe that the RSS policy statements should be extended to include reference to the need for Local Planning Authorities to recognise that extensions and modifications of existing strategic assets, as well as new water and sewage treatment facilities, will be required to provide for the long term growth in demand from new housing.  
 Other RSS consultations contain explicit policies requiring the proposed spatial distribution of new homes to include an assessment of flood risk. It is disappointing that the West Midlands draft RSS does not include any such policy recommendation.  
 It will still be vital for planners and developers to talk to the water companies about sewer capacity constraints when considering locations for new houses in order that sewer flooding problems are not created or worsened by the new development.

Professional

***Response Capacity***      ***Response***      ***Other Comments***

Royal Town  
Planning Institute  
(West Midlands)

1058 Climate change is the "elephant in the room" that has suddenly become noticed. Over the years planners have wrestled first, with the concept of "environmental impact" and then secondly, with the concept of "sustainability". Now, planners are being expected to consider much wider global issues of climate change, the scale and consequence of which extend far beyond the West Midlands. However, it is now generally (and refreshingly) recognised that everyone must play their part in combating climate change and indeed planners are now taking a lead role. The Phase 2 review needs to develop some of these emerging ideas and explore the ideal forms of development which might best respond to the pressures to combat climate change - using the advice in the Stern Report, the draft Climate Change PPS and the Code for Sustainable Homes. We also clearly need to review the potential effect of climate change on habitats, by pursuing a strategy of both mitigation and adaptation, which will best achieve sustainable forms of development. The RTPI takes the view that there must be an integrated strategy - not separated into phases - which addresses the various aspects holistically. This should aim to provide for the full needs of the region, in terms of homes, jobs and services, but should reflect the available land capacity, the environmental constraints and infrastructure limitations and also market considerations in terms of its distribution.

Professional

Quarry Products  
Association

1059 There are no policies relating to minerals within this Regional Spatial Strategy. This should not be the case as MPS1 paragraph 15 states that RPBs should, "identify at regional level, those minerals which are of national and regional significance and include policies for them in RSS". Regional minerals policies should assist to achieve the National objectives for mineral planning.

Professional

National Housing  
Federation (West  
Midlands)

1084 Alignment of the Regional Economic Strategy and Regional Spatial Strategy.  
Co-ordinated strategies would provide in particular the opportunity for housing and jobs to be planned together, so that the workforce can be housed within easy reach of employment.  
There is considerable opportunity for the two Strategies to be aligned, both functionally and procedurally.  
The emphasis in both Strategies, therefore is on considering new ways of delivering the fundamental and essentially shared aims of the region.

Professional

***Response Capacity***      ***Response***      ***Other Comments***

Drivers Jonas on behalf of The Birmingham Alliance

1092 The Strategy provides a focus on the role of Birmingham as the regional capital with emerging would city status. This should be supported through the encouragement of further sustainable retail led regeneration within the city Centre that consolidates the elevated status of the Centre and provides for additional enhancement of the City's economic and social functions.

The emerging RSS Phase Two Revision should therefore give recognition and support to the benefits of further significant investment in Birmingham City Centre, including the accommodation of additional retail and mixed use development. Such investment and development will provide wider advantages in terms of the prosperity and growth of the region as a whole, as well as contributing to the viability and vitality of other centres in the wider region.

The key issue will be to ensure that the assumptions and outcomes of the Regional Centres Study, if taken forward in the Phase Two Revision, should apply equally to the Phase One Revision and particularly the retail floorspace figures within the Black Country Centres.

Professional

L N Mitchell Ltd, Foxhill

1236 L N Mitchell Ltd wishes to support the broad concepts contained within the West Midlands Spatial Strategy and put forward land for consideration in the provision of a future reservoir or employment land and housing stock.

Professional

Severn Trent Water

1249 Overall, we are disappointed that the West Midlands draft does not explicitly consider the issues around water and sewerage service provision that arise from the spatial options being considered. In order to meet future growth in demand from new housing in the areas identified in the RSS, expansions to and renewal of existing water and sewerage service infrastructure as well as new facilities will be required. Without these changes the ability to meet future growth in demand will be put at risk and existing customers' levels of service could be affected. We believe that the RSS policy statements should be extended to include reference to the need for Local Planning Authorities to recognise that extensions and modifications of existing strategic assets, as well as new water and sewage treatment facilities, will be required to provide for the long term growth in demand from new housing. Other RSS consultations contain explicit policies requiring the proposed spatial distribution of new homes to include an assessment of flood risk. It is disappointing that the West Midlands draft RSS does not include any such policy recommendation.

Professional

***Response***    ***Response***    ***Other Comments***  
***Capacity***

7 Finally I feel special attention should be paid to addressing the social needs of the young people of Worcester. With the exception of the Perdisswell Young People's centre north of the city there is very little for 12 to 18-year olds to do. If further homes are to be created, there will be more young people to be looked after.

Resident

19 Residents of Worcester and the locality value and appreciate that they live in an area of natural beauty surrounded by green field sites. That is the key that makes Worcestershire such a beautiful place to live. All those involved in planning need to take a long term view and consider the impact on the local environment and the lives of the residence already living in the area. I am concerned at the lack of public consultation taking place. I have viewed the website [www.wrma.gov.uk](http://www.wrma.gov.uk) and the Spatial Options document and am unable to have enough of an idea what is actually planned, what level consultation will occur, whether the effects on the environment and pressure on local services will be a key focus or whether there will be a feasibility study on these

Resident

23 Any development should be purely led by local demand, as determined by the Parish and District Councils, no by career politicians from the big Cities.

Resident

29 The West Midlands is already overcrowded and over populated for the local recourses, services and structures. We already have the green belt under threat. Yet a growing population desperately needs outdoor, recreational areas (piece and quiet, wildlife, walking areas) to maintain quality of life. The development, protection and expansion of parks, playing field, nature reserves, walk ways are all essential for quality of life. A growing population needs recreation, pleasant surrounding. These need to be safe and protected. Wildlife need to be protected, enhanced and developed. Areas such as Cannocli chase, Sandwell Valley, RSPB centre, Waseley Hill are essential to maintain quality of life. We need more areas like these.

Resident

***Response  
Capacity***      ***Response***      ***Other Comments***

38 There are insufficient facilities for young people in the area, which I feel has led (in part) to the ridiculous levels of antisocial behaviour we are forced to endure.

Resident

39 Totally unacceptable and meaningless that officials living outside these areas have the final say on what happens, overriding the wishes of both the local MP and the local councils.  
Should such large number of houses be built, will we be provided with extra public transport, dentist, doctor, local shops, school, etc. Or is the plan merely to "dump" these houses and run!

Resident

*Response*    *Response*    *Other Comments*  
*Capacity*

- 44 Page 3  
The overall vision for the West Midlands, to be 'rich in culture and environment...' is not achievable given the considerable scale of proposals for growth of housing, employment land, logistics centres, associated infrastructure etc.
- Page 6  
Whilst a Sustainability Appraisal has been carried out, it recognises several shortcomings, which need addressing. There is also a Regional Sustainable Development Framework which should be applied to this Options Paper and an associated Sustainable Development Toolkit - what role has this played?
- Page 8/9  
Several key changes in policy have been omitted. The key role that Food and Farming will increasingly play in the future is ignored. With greater risks posed by climate change, productive farmland needs to be robustly protected, both for its food production capacity, as well as its growing future role in the production of bio fuels. Extensive development proposals across Greenfield farmland and countryside are unacceptable and unsustainable. The increasing recognition, in policy, of the importance of biodiversity, is not recognised here. The Natural Environment and Rural Communities Act 2006, the new PAS 2010 all indicate their requirement to protect, conserve and restore biodiversity assets. This is not recognised. The emphasis on following trend ignores the recognised need for addressing the challenge of over-consumption. It also fails to recognise the inherent lack of sustainability of continuing to allow high rate of in-migration, second home ownership and vacant homes.
- Page 21  
Reference is made to the fact that new housing development could enhance biodiversity - but in fact it should enhance biodiversity.
- Page 22  
All new housing...will have the potential to increase carbon dioxide emissions. The work 'potential' is unnecessary - new housing will increase carbon dioxide.
- Page 27  
Asks 'At what point will new homes lead to unacceptable damage...or breach thresholds'? This question is unrealistically broad and subjective.
- Page 29 I do not feel there should be significant development on Greenfield land in any areas. Shrewsbury for example has expanded out of all recognition and has sprawled extensively to the detriment of the town's local distinctiveness.
- Page 34  
Warehousing and logistics provides relatively few and poor jobs. They sustain commercial activities which in the long term are not viable environmentally. A visionary approach to economic/business/ commercial growth is required.
- Page 42  
'There may be parking issues...'  
'There could be implications for the greenbelt...This could impact on biodiversity'.  
Of course there will be! May be and could be are inappropriate and unacceptable phrases!.
- Page 43  
The demand from the logistics market cannot be met indefinitely - the UK government is encouraging sustainable lifestyles through programmes - these fundamentally conflict with the rapid expansion of RLS's.
- Page 51  
What is the environmental, social and economic impact of out of centre offices? Negative impacts on environmental assets, Greenfield/farmland lost, more traffic generated. Negative impacts on social well-being.
- Page 79  
Any changes to airport facilities should reflect Government thinking - which stresses that the greatest threat to human kind comes from Climate Change. If this document is to adhere to Government priorities to deliver sustainable communities and contribute to sustainable development then it needs to:  
\* Critically analyse the trends which it currently simply accepts as a basis  
\* Emphasise resource efficiency, minimisation and mitigation of environmental and climate change impacts  
\* Address policy shortfalls i.e. lack of reference to Sustainable Development Strategy, Climate Change Targets  
\* Drive forward efforts to promote local sourcing, minimise the need to travel and maximise sustainable transport, address health issues.

*Response Capacity      Response      Other Comments*

Resident

50 Can I suggest a FULL environmental analysis takes place before arbitrary Greenfield site are chosen by a group of people sat in some office miles away, who have little idea what they potentially could destroy.

Resident

52 Bevere is renowned for being a quiet residential and sought after area, which is why we live there and I feel strongly that if new development is built in this area it will become noisier and less sought after thereby decreasing the housing value.

Resident

53 Police care (Station closed at peak times)  
Hospitals (Closure and nursing staff being made redundant).

Resident

*Response Capacity*      *Response Other Comments*

54 These plans were signed and settled 15 years ago when the bypass was created and arrangements we made between the planning authorities and the major developers to buy up areas of land with a view to future building plans. There are not enough resources to address present housing numbers in relation to hospitals, doctors, schools etc.  
Planners and developers appear to be blackmailing the electorate by only offering to improve the infrastructure if the plans are approved to build houses and business parks on green belt sites.  
To take a specific example of Site 14 - Crown East to the West of the city. To an outsider this area appears to adjoin a council estate but it fall outside both the city boundary and than planned bypass extension unless they move the city boundary beyond the bypass as well!  
Why do we need another out of town retail park along with new houses when all the evidence indicates that the future of retailing is either online or reverting to town centres?  
There is no advantage in trying to pretend that Worcester can compete with Birmingham in terms of a shopping experience, so we should concentrate on its market town status and location in the heart of England's countryside.  
Natural resources are being stretched. There is an increase in flooding and a shortage of landfill capacity. More green belt development can only make that situation worse.  
Tourist come to Worcester to see the Cathedral, the cricket ground, Worcester Porcelain and its green and pleasant land - not a large city shopping paradise.

Resident

56 Encouraging carbon producing commuting hardly seems sensible.

Resident

57 I think that you should abide by your chosen words on the website and 'make sure that the interest of the people of the region remain at the forefront of decision making'.

Resident

*Response*    *Response*    *Other Comments*  
*Capacity*

- 67 The new hospital has less beds than Worcester had 5 years ago, but is responsible for a larger area. There are few brown field sites left, so your proposals will create more urban sprawl with the loss of farming and green countryside.  
How much money is your unelected committee paying for the corrections required in the city before meeting the costs of expansion?

Resident

- 73 Our local council did raise the pavement some years ago and this has reduced the problem of our flooding in all but extreme conditions. The council also explained that the sewer in the adjacent Ombersley Road was installed during Victorian time and is 9" diameter, whereas our sewer was installed in the 1930 and is 12" diameter. Water will always find the path of least resistance and so runs out of the Ombersley Road sewer and into the Beckett Drive sewer. If the proposed housing is to be served by the Ombersley Road sewer the additional water run off and sewage generated by these houses will magnify significantly the problem for Beckett Drive residents in general and our house in particular.  
What assurances can you give us that should this city expansion go ahead our existing problem will not be exacerbated?

Resident

- 74 Our home is on the western side of Nortwich Road on the edge of the slope leading down to the flood plain.  
The impact of a new river crossing, particularly if following the more southerly of this two possible route, would be devastating on this locality and upon the north Worcester environment generally.  
It would appear that this road and this bridge would run within perhaps 30 meter of our property cutting across valley and running along a substantial part of its length.  
The impact on this valley and on the residents who live here would be profound.  
At present this valley is peaceful and unpolluted, a heaven for wildlife and a constantly used recourse for walkers, as well as being significant as a flood plain.  
There can be no doubt that the effect upon the environment would not be beneficial. If such a crossing must be created I feel that this more northerly one

Resident

***Response  
Capacity***

***Response Other Comments***

89 Local schools are already full. What plans would there be for new or expanded schools?  
Worcester Royal Hospital does not have enough beds for the existing population.

Resident

97 The new hospital cannot cope with current demands.  
A far more serious effort needs to be made to bring back tighter controls of immigration and empty the Country of all the illegal. By doing this alone should seriously reduce the demand for housing.  
We currently have very poor council leadership totally unable to deal with any of the above mentioned problems.

Resident

108 The loss of productive agricultural land in an era of very likely failing world food harvests should also be considered.

Resident

131 St John's on the West of the River Severn would certainly not cope with the rise in pupil numbers at present and if funding is finally found to re-build it within the next few years will money be available to accept the additional pupil numbers required within the next ten or twenty years?

Additional housing would mean more retail outlets, supermarkets etc., particularly sparse on the West, but it caters for all our needs with it's small specialised outlets. We don't want large scale retail developments on green-field sites.

We hope any building will be kept to the absolute minimum so that Worcester, the County Town with it's surround beautiful countryside can stay relatively unspoilt, to be enjoyed by our grandchildren and great-grandchildren.

Resident

***Response  
Capacity***

***Response Other Comments***

134 Global warming will make this level of commuting unsustainable in the future.

The pollution from huge amounts of additional cars would lead to terrible ozone pollution problems.

Most of Worcester's water comes from the River Severn. In times of drought we can't keep extracting more and more water, a real potential consequence of the housing proposals from this river without causing it irreversible damage.

Resident

135 Hospitals have been closed, now you are talking about building new ones, how stupid is that!

Resident

141 We will need improved services, as we know that heavy rain, even for short periods, brings floods and in some places the water pressure is poor, while the electric suppliers are slow to mend damaged cables.

Resident

**Response**    **Response**    **Other Comments**  
**Capacity**

145 In the light of the current warnings about global warming, it is insane to propose building on the River Severn flood plain (areas 6, 7, 17, 18 and part of 13). Flooding of this major river has caused problems in many towns and cities along its course, including Worcester and is predicted to increase.

The land around the River Severn is good, productive agricultural land, not just wasteland.

Environmentalists are increasingly worried about "food miles" and the supply of local produce, yet area 1 on your plans obliterates a thriving market garden and farm, including an exceptional farm shop supported by thousands of Worcestershire residents, who are voting with their feet and buying locally grown fruit, vegetables and locally reared meat.

Local schools in Claines and Northwick are already oversubscribed. Where would the children from 17,000 extra families go? There are not enough NHS dentists to cope with the existing population, and the Worcester Royal Hospital struggles to cope, how would these and other essential services be expanded?

It will totally change the character of the historic City for ever, turning it into yet another faceless commuter town.

Resident

147 To destroy this inheritance would border on vandalism as would the conversion of the historic market town of Evesham into an industrial centre to stimulate strategic growth.

Resident

152 Worcester is an old historic City and many of its streets are narrow and medieval.

The River Severn is prone to severe flooding. It would be disastrous to build in the flood plain.

Finally, when we requested the options document and questionnaire in relation to the proposed Worcester development, we were sent an enormous document which was mainly about the West Midlands. We really didn't have the time and patience to search through it for anything relating to Worcester. The postage was £1.50. What a waste of public money sending such a big document when we only wanted the information which was relevant to us.

Resident

**Response**    **Response**    **Other Comments**  
**Capacity**

153 WMRA has not thought this out properly. Where is the money coming from to satisfy the needs created by building all these houses? How is water, power, sewage and waste disposal to be provided? How will hospitals, GP's, dentists and social services cope, when there are already waiting lists. Schools, police, fire service are already stretched.

I do not wish to live in a suburb of Coventry. I want to save some of our beautiful countryside before it is too late.

Resident

163 Worcester is a classic county town with a long history and many historic buildings, which limit planning options especially transport. The plans as outlined are a classic example of cart before the horse. There appears to be no new money to provide the necessary infrastructure, required for such a massive increase in population.

Will the hospital be expanded before the development begins?

Will there be sufficient water for an increased population without a new reservoir? Would a new reservoir be constructed in time?

I have not mentioned other essential services such as schools, employment, medical centres etc. The same logic applies to them as well. There must be massive government money up front - not a likely option.

There are far too many people in this country and no doubt this is why the government thinks that all this development is necessary. Maybe it should look at controlling the population as an urgent option.

Resident

174 Worcester is the size that it is. More houses, more people, more all in the same space. It will lead to imbalance, it will lead to stress amongst the people, and it will lead to crime - mark my words! The creeping tide of demands, contracts, and more ... all-in the same space. Worcester has it - the people of its past are to thank for that - don't destroy it. You know its simple - you reap what you sow. \*Keep the sun shining over Worcester\*

Resident

***Response***    ***Response***    ***Other Comments***  
***Capacity***

177 The environmental consequences of covering fields in concrete is to be avoided. We are constantly being told to buy locally produced food and not import so much food, so our fields and farms need to be kept for food production. The West Midlands countryside is prime agricultural land. It is an area for growing food, raising dairy cattle, everything for food production, to take away would be a terrible waste of land.

Resident

178 There is a need to ensure retention of land for food production. (This will, of course, become more important, even vital, when the effects of Global warming increase).  
There is an overriding need to ensure that you listen to the voice of organisations, particularly elected bodies, representing those whose earnings provide the finances necessary to fulfil your scheme.

Resident

184 The planning policies should be very carefully studied. Firstly because of the traffic, the burden on the hospital and the schools, etc.

Resident

199 The questionnaires are written in a very technical and precise manner and I believe this discourages wide participation in the consultation process from members of the public.  
There is little opportunity for members of the public to make broader observations.  
The whole process gives the impression that civil servants know best and we (the public) should be grateful.  
I believe there should be some far simpler questions. If you are charged with ensuring the widest possible consultation of the residents of Worcestershire you need to find ways of engaging all of the people and seek their views on the basics of these proposals.  
No doubt your response will highlight the consultation workshops with Parish Councils, to which my response would be:  
a) My experience of Parish Councils is that they are a largely self selected group and therefore not particularly representative.  
b) Given that they are not particularly representative the vast majority of the population have little or no opportunity to voice their opinions and concerns.

Resident

***Response***    ***Response***    ***Other Comments***  
***Capacity***

210 Car parking is inadequate. No park and ride facility is planned for Martley Road area.

Resident

217 The schools in Worcester are already full. How many more would we need and who would pay for them?  
Our present new hospital in Worcester already needs to be double in size. Who would pay for another hospital?  
This country is already short of water. House building in the south-east has already created a shortage.  
Most of the land earmarked for buildings is 1st class agricultural land - which is in short supply. Locally grown food is available to local people. We don't want inferior imported food. This is totally contrary to the governments supposed - but phoney - aim to reduce 'food miles'.  
The 'carbon foot print' will increase if these plans go ahead. With the rising water from global warming, why is much of the planned expansion on the flood plain?  
The Government should not impose any unnecessary expansion on us. Local people know the needs of the City and County far better than a remote

Resident

224 Local autonomy at City and County council is being treated as an irrelevance - the very notion of 'consultation' makes a mockery of democracy.  
'Consultation' is a meaningless farce that merely pays lip service to any idea of public involvement.  
Britain has finite land space, something that is being squandered at an alarming rate by the present government through its reckless open-borders policies and over-eagerness to accommodate business interest. What kin of country will we leave to future generations - green and pleasant land or an urban hell?

Resident

229 I disagree with a 'regional body' dictating planning policy over such a wide area. I am firmly in the belief that matters relating to planning should be left to town councils to decide.  
On what grounds do I oppose the strategy? For those stated above. Namely, market forces along with the desires and needs of the residents within a locale should dictate housing policy and not the WMRA, National Government or the EU.

Resident

***Response  
Capacity***      ***Response Other Comments***

247 Technology buildings is not what the townsfolk of Bromsgrove want.

Resident

259 It is extremely difficult for people, especially the elderly or handicapped, to cross the roads in Worcester and also for buses and emergency services to negotiate side roads which are blocked with parked cars.

Resident

284 Planning should be done at District and County level by elected representatives who are in close touch with their constituents and who therefore know what the public want, and not by a remote un-elected Regional body. Recourse to expensive consultation exercises (the results of which are largely ignored) would be unnecessary.

Resident

286 I would suggest that the most useful report concerns the 'infrastructure Implications of the Housing Options'

This could actually provide a useful basis for a 'Strategic Environmental Assessment' of the West Midlands Regional Spatial Strategy Options. However it would have been even more useful if the report had been incorporated in a slightly more accessible form into the main options consultation document.

The 'Environmental Implications report' has a better conceptualisation of the spatial options than the main consultation document, providing not 3 but 4 housing led development options as follows:

1. high urban concentration in major urban areas (MUAs)
2. expansion of sub-regional foci
3. a small number of major new settlements
4. more dispersed urban extensions?

Option 1 emerges as the best environmental options

Resident

*Response Capacity*      *Response*      *Other Comments*

308 I am concerned about the impact that such extensive building works would have on the environment and in particular upon flooding in and around Worcester.

At present Worcester is a very pleasant place to live largely because it has clearly defined green areas around it. My own locality is also rich in wildlife much of which is scarce nationally - such as skylarks, tawny owls and buzzards and many migrating birds such as geese.

I am particularly concerned about the impact of the proposed new building development upon the regular flooding problem in the Worcester area.

These green areas are currently soaking up a large amount of water that would swell the River Severn even further should they be built upon. In my view these two areas need to be retained as green areas in order to ameliorate the flooding problem in the lower lying areas nearby and to offset the carbon

Resident

Balsall Common  
Village Residents  
Association

321 Balsall Common has just undertaken a major consultation exercise as part of its Village Plan process. There are a number of issues which need to be addressed by a variety of service providers, SMBC, transport undertakings and utility providers. I would suggest the following responses: (1) that infrastructure issues should be an integral part of all strategic decision making processes at local and strategic levels. (2) that no major changes involving housing or employment developments be undertaken without an audit of infrastructure capacity sanctioning the change. (3) an independent assessment of the value to the Region of the expansion of Birmingham Airport, that assessment to cover environmental issues as well as economic matters.

Resident

325 Spatial strategy - whilst I appreciate this document is intended for decision making in councils, as a member of the public, I found it very difficult to comprehend.

Resident

391 Please do something which does not involve further erosion of the Meridan Gap?

Resident

***Response  
Capacity***      ***Response***      ***Other Comments***

396 Re-classification of brownfield sites to garden sites - following Mrs M Spelman (MP) attempt to put forward her Private Members Bill regarding the above, we are writing to express our concerns regarding the present classification of Garden Sites. People come to live in the Borough of Solihull because of the quality of life on offer for the following reasons: 1) large green open spaces where they can take their children and grand-children on walks in various woodlands and parks 2) the wildlife in their gardens.

Resident

398 Apart from the above strong objection, concern must be for the ever eating away and destruction of our wonderful countryside, the wild life within our countryside and undermining of village life. The very essence of our life is at stake, the environment must be protected.

Resident

403 The new hospital was built too small even for the present population and much of the site was sold off for office development, leaving insufficient space for enough parking. Water, sewage, education and other services would require very considerable sums of public money. I am also concerned at the possible effects on the flood plains and for the preservation of an attractive part of the Severn valley that brings many benefits to far more people than just the residents of the City.

Resident

421 I regret that I am unable to return to you the questionnaire on the above subject. I could not sort out the gobbledegook and the constant reference to acronyms.

Resident

*Response*    *Response*    *Other Comments*  
*Capacity*

436 WMRA is an unelected body. It is therefore questionable as to whether it has a mandate to impose planning policy, superseding the decisions of the elected members of local authorities. Any decision by WMRA will be an undemocratic diktat and therefore questionable under the law. This consultation process is a sham. The public have no firm proposals on which to comment. The RSS is devoid of specific details regarding proposed land use. The interpretations resulting from any analysis of the comments made by the public will therefore be largely valueless as they have been asked to comment on important but intangible issues without first being fully informed. Furthermore it is questionable whether due regard will be given to the consultation by unelected bureaucrats at WMRA as they are accountable to no-one. The questionnaires (intended to form the basis of responses) are biased with heavily loaded questions and are in many instances multiple choice. At every level my elected representatives oppose the proposed RSS. My MP, my county councillors, my district councillors and my parish councillors are all on record as having very strong reservations about the current RSS. However, all of these layers of democracy appear to have now powers of influence - they too are but mere consultees. I have been disenfranchised. There is considerable and uniform opposition to the RSS in its current form from all sections of the community in Worcester. As the resident of a rural district (Wychavon) bordering a city (Worcester) I have been twice disenfranchised. Firstly by Kate Barker and the WMRA (see above) and by the axiomatic assumption of Worcester that it has no space to build within its own boundaries, yet it is still compelled to do so by the RSS. To conclude, I like the County Councillors of Worcestershire, have serious misgivings about the RSS and would respectfully request that each and every aspect of it is subjected to its own most rigorous assessment: "... One of the most important tests in assessing the Spatial Options is whether they positively support and promote the principles of urban and urban renaissance." It is such a momentous and irreversible development in the social and economic structure of a rural shire that thorough and due consideration must be given to all the issues. Those decisions may in turn be subjected to further scrutiny by judicial review. Of the three options presented by WMRSS, I hereby reject all three and would advise WMRA to step aside and return the process of government to those for whom the electorates of the region voted.

Resident

452 Funds have been put into the building of a new police station but the number of officers has not been increased in proportion to the huge increase in the number of citizens in the city.

Resident

472 Whoever compiled these questionnaires has lost sight of the fact that there were over 30 abbreviations, and we who have to answer it are, in the main normal folk, not versed in government speak. I personally found it intimidating in the way the questions were couched. Not user friendly.

Resident

***Response***    ***Response***    ***Other Comments***  
***Capacity***

475 The region is well placed to grow significantly over the next 20 years because of its geographical position in the UK, especially with the growth in internet shopping. With space limited at ports, railheads will become increasingly important. Distribution, however, needs lots of space with a limited manual input. Employment space will therefore have to be increased beyond its normal formulae.

Resident

492 The economy has not been helped previously and Redditch is not popular with incoming companies. The infrastructure has never been here and the road systems are inadequate.

Resident

494 Hospital facilities are already stretched and the Worcester Royal Hospital is currently in financial difficulties with cut backs in staff and services. Worcestershire receives the lowest capital per pupil for the education of its children, and there are only 5 high schools in the city. The city is prone to flooding and the water/sewerage services are already overstretched with many areas suffering from poor systems.

Resident

498 It is positive to see that in the introduction recognition is given to the diversity within the West Midlands and the needs of aspirations associated with diversity. The Regional Flood Risk Assessment - the possible maximum extend of flood plains should be used as the guide for development and restrictions on development places in these areas to ensure the impact of a rise does not have a potential disproportionate impact on buildings insurance and buildings insurance claims within the region. This needs to be given full consideration for the impact of canals and rivers which over recent years have developed into a significant asset and attraction for the region.

Resident

***Response***    ***Response***    ***Other Comments***  
***Capacity***

501 Worcester - health, education and other services would make further substantial demands upon limited financial resources. The Royal Hospital in Worcester can scarcely cope with the existing population and there is no room for expansion. There appears to have been a failure to appreciate the magnitude of the problems that would be created, in particular for Worcester and the scale of the investment that would be needed. One must bear in mind too that cost projections for many projects in recent years have proved to be substantially underestimated.

Resident

522 I strongly disagree with a 'regional body' dictating planning policy over such a wide area. Upon discovering that 'West Midlands Regional Assembly' existed I scrutinised your website in an attempt to discover under what legislation your organisation came into being. I discovered nothing to enlighten me. It was my understanding that one of your initial principles was to act as a discussion forum between councils, local business etc. which I considered a good thing but only insofar as these 'chats' should only be used merely for information purposes only and not to form policies that will have a long standing effect on the people within the West Midlands area.  
I am sure you do not really need to be told that your WMRSS documentation is most definitely not reader-friendly. Was this intentional perhaps? To say that, for the most part, it was totally incomprehensible would be putting it mildly. Your questionnaire, also, seemed to be extremely biased in giving me no opportunity to express my opinion fully.

Resident

523 May I state my disagreement with a 'regional body' dictating planning policy over such a wide area. Upon discovering that 'West Midlands Regional Assembly' existed I checked out your website hoping to discover under what legislation your organisation came into being. This information escaped me. However, I do believe that one of your initial principles was to act as a discussion forum between councils, local business etc. This I found quite encouraging. But these 'chats' should only be used for information purposes only and not to form policies that will have a long standing effect on the people within the West Midlands area.  
I am firmly in the belief that discussions relating to planning matters should be left to town councils to decide.  
I found your documentation relating to the WMRSS, for the most part, beyond my comprehension, to say nothing of the fact that your questionnaire was

Resident

***Response***    ***Response***    ***Other Comments***  
***Capacity***

527 My third and final expectation is that the democratic process will be applied; that the majority local opinion will be implemented after consultation. Building development should not be 'steam-rolled' by central government or regional assemblies based on broad brush policy. It should be decided by a thorough assessment, balancing local housing needs with the capabilities of existing infrastructure and with the effects on the quality of life for the local residents. It should have local approval.

Resident

528 Could the green belts not be given the added purposes of providing sources of renewable energy, especially bio-fuels, and acting as carbon sinks? Such links between the urban and rural areas would help to unify and strengthen the region.

Resident

534 We wish to register our absolute objection to the proposed Regional Spatial Strategy (RSS). We are in full agreement with the views and concerns expressed and the objections raised by the Parish Council of Upton Warren. Much of the southern party of Worcestershire adjacent to the Severn and Avon rivers is subject to flooding, which can only increase as climate change begins to bear, thus reducing the land available for development. There is an area of green belt designed to protect the countryside from encroachment from either Bromsgrove or Droitwich, without which protection there would be almost unbroken development from Birmingham to Worcester. We supported the previously modified Structure Plan which gave development priority to development of all brownfield sites prior to any greenbelt sites and in which the pre-eminence of Droitwich for development was superseded by that of Evesham as the preferred area. The south east of the area around Evesham would benefit most from any development of the infrastructure, including improved rail links to Oxford and beyond, and provide alternative employment to that traditionally offered by fruit and vegetable production. However the proposals for severely increased numbers of dwellings is completely out of all proportion to the true needs of what is essentially a rural community. Further increased development would severely compromise the strategic gap to the immediate north of Upton Warren, which should be preserved at all costs, and may interfere with the rare wildlife on the Nature Reserve immediately to the east of the village.

Resident

536 The RSS is equally to meet the needs of rural communities "while enhancing the unique qualities of towns and villages and the surrounding countryside". The proposed RSS Revision is not going to counter continued urban decay, yet at the same time it will seriously jeopardise our unique and precious rural

Resident

*Response*    *Response*    *Other Comments*  
*Capacity*

567 Providing only six weeks to respond serves to amplify further the sense of being railroaded into an uncertain future.

Resident

576 West Midlands Regional Spatial Strategy - Phase Two Revision. I think the document is far too complicated. It's almost like the people "in power" are trying to stop the public being involved. Global impact - I know it is mentioned in the WMRSS phase two revision but I cannot emphasise that building this number of houses will have a huge impact on the global environment. I am fully aware that it will be completely insignificant when compared to the emissions of China and India but we, that is the whole planet, have to start somewhere. The CO2 emissions as a result of building this number of houses will contribute considerably to global warming and that is long before the occupants of the new homes have turned any lights on. Also there is bound to be a loss of the very plants required to remove the CO2 from the atmosphere, trees, so there is a double whammy. The water supply is bound to be put under greater pressure with more houses to be supplied. We are running out of catchment area for water and yet more strain will be placed on the water system. I know we have had a very wet winter but summers are getting hotter as a result of global warming. Even past skeptics of global change now accept that something is changing with the atmosphere. More and more people crammed into less and less space. It is inevitable for crime to increase. There are far too many people in the country. We need less people in the country not more houses. What I'm really trying to emphasise is that we are a small Country. We simply do not have the room to build more and more houses. It is complete madness. Indigenous Britons are leaving because they are completely fed up with this once great country. So why do we need loads of new houses. Re. regeneration article by Councillor Geoff Williams in the 18th January edition of the Berrows Journal, I think Battenhall Road and Battenhall Avenue are just about two of the most delightful areas of Worcester. From the tone of the article, Councillor Williams would like to demolish the "large houses with large gardens" Councillor Williams' words and replace them with shoe boxes and no gardens. We don't want large houses and gardens flattened and turned into ghettos with all the associated problems. What we want is a smaller population.

Resident

604 That people living in such a wonderful part of the country can be dictated to by Central Government seems absolutely beyond belief in a "so called" democratic society. The time scale and scope for the Consultation Period is totally inadequate for such an important change to the whole environment of Worcestershire, or in fact any other county. The questionnaire was design to be impossible for the average person to complete.

Resident

***Response  
Capacity***      ***Response***      ***Other Comments***

605 There is a difficulty in responding to the document because of the amount of information to absorb and to comment on.

Resident

626 No research/study into suitability of drainage, access etc for building in the Redditch area has been done.

Resident

627 Policing is very noticeable by its absence.

Resident

& Family

635 Bet you there isn't anybody on your committee which is in a wildlife trust?

Resident

Dorridge &  
District Residents  
Association

655 The parking guidance fails to provide either the protection or the flexibility for the semi-rural areas such as Knowle and Dorridge where we find that we continually are viewed as being part of the MUA whereas we have a strong affinity to the rural areas.

Resident

***Response***    ***Response***    ***Other Comments***  
***Capacity***

716 My first comment is addressed to the lack of information made available regarding this consultation. In view of its content and long term implications it would be reasonable to expect that The West Midlands Regional Assembly would have arranged public meetings directly between the public with themselves in attendance in order to provide question and answer sessions in addition to exhibitions and literature detailing how the figures contained within your

Resident

743 On page 2 the key aims are listed under Urban Renaissance you suggest making them better places to live and work however for Rural Renaissance you tackle challenges that are not stated.  
Page three and Revision Update appears to be concerned about the Black Country, towns and cities and as for the rural areas they are somewhere to put sites for the Gypsy and Traveller so please consider towns and cities for them as well as rural areas.  
I agree with Regionalisation as this could be achieved by all the surrounding Unitary Authorities talking to each other. In the same way that the Government encourages Parish Councils to talk to their parishioners. My thoughts are that small is beautiful and controllable.  
I do not remember voting for a West Midlands Region so I question how you have the authority to be shaping our future when we already have recognised Unitary Authorities to do this work.

Resident

752 Worcester - the New Hospital, which was long awaited has fewer beds than the ones it replaced and could not function with increased patients.

Resident

798 Although those with the power to make these decisions claim the support of the Worcester people, no exact survey of Worcester people's attitudes has been taken.  
At Bevere Green and to the Borth of Bevere Lane there is a considerable area of planted parkland that links with the open area by the river, as well as a number of attractive established properties, not to mention the trees and pastoral landscape open to walkers and cyclists.

Resident

***Response  
Capacity***      ***Response Other Comments***

811 I do not consider that sufficient opportunity, or time, has been given to challenge the original assumptions on which the national and regional development plans were based. I consider this to be true also in regard to consultation questionnaire published on the WMRA website. The steps taken by the WMRA, which is an unelected body and not accountable to the electorate, appear to prescribe to councils, and electors within the designated areas exactly what is to be done. This is accompanied by a consultation process which has the appearance of engaging interested parties, but is subject to conditions and timescales, and apparently artificial choice, which in part will deny real and effective input and influence over the plans that have been published. I consider the process to be procedurally flawed and seriously unfair. Moreover the documents published make no reference to the costs of the plans and how they are to be met. Will this mean an increase in taxes of all kinds and the costs of transport and utility services?

Resident

819 The WMRA is an unelected body, and none of the members hold an electoral mandate for anything proposed to the RSS. The information provided is so lacking in specifics that any serious comment is not possible.

Resident

834 I also find the way the report is laid out together with the 'jargon' used most difficult to understand.

Resident

879 Please note my disappointment that as an independent assembly you have never contacted me to discuss any of the above options, instead left to local council which costs them money. It is as if you don't want anyone to know about this consultation document and after the work and effort put into it - is that really the outcome you desire?

Resident

***Response***    ***Response***    ***Other Comments***  
***Capacity***

911 01 to 09 inclusive: There is a significant vacancy rate of offices within the urban area. There has been a change in the market, with a greater number of people now working from home; this seems to be a growing trend. This appears to be the most sustainable option as it reduces travel emissions, congestion and energy consumption. Therefore, we believe working from home should be encouraged, which would reduce the need for further large scale

Resident

929 I think it is unlikely that members of your remote, imposed and unelected body know of the repugnance induced in so many of the population by their being dictated to by people without credibility or accountability. A plague on such groups who seek to dictate to the elected public.

Resident

957 I am particularly concerned that the Labour Cabinet ignored County Councillor Matthew Ellis's attempt to inset a clause to their submission that neither Lichfield nor Tamworth can be expected to shoulder the burden of building distribution if Option 2 is accepted by the Regional Assembly.

Resident

983 I have been very surprised at the lack of information made available to the people of Redditch. There has not been information made available on how various options would be put into effect - or shown how the accompanying business would be attracted to Redditch or how the Town Centre could be enlarged and what further facilities would be incorporated or the very basic aspect of infrastructure!

Resident

990 I suspect that any 'referendum' on whether any of the options was wanted by the city's residents would result in a resounding "No". I do not believe there has been any serious engagement with the people of Worcester so far. The 'Questionnaire' that accompanies the proposal is extremely intimidating and almost appears designed to deter feedback.

Resident

***Response  
Capacity***

***Response Other Comments***

997 While I found this document to be a fairly straightforward read, the same cannot be said for the questionnaire which is long and technical and appears to give equal weight to the fundamental and the more secondary issues.

Resident

1006 I oppose the WMRSS as a whole.  
I found your documentation relating to the WMRSS almost incomprehensible. In particular your questionnaire was biased in not allowing me to express my opinion fully.

Resident

1019 In the 'Context' section of the consultation of this WMRSS you mention Climate Change - but the rest of the document is pretty much back to 'Business As Usual'.

Resident

1024 I disagree with a 'regional body' dictating planning policy over such a wide area. I am firmly in the belief that matters relating to planning should be left to town councils to decide. I found your documentation relating to the WMRSS almost incomprehensible. In particular your questionnaire was biased in not allowing me to express my opinion fully.

Resident

1083 I object to the fact that local people are not been significantly informed about the RSS and have not been provided with enough time to digest the information and issue their opinions.

Resident

***Response  
Capacity***      ***Response Other Comments***

1126 What healthcare improvements would be included; in particular upgrading of existing hospitals such as Kidderminster?

Resident

1190 We further object to an unelected and undemocratic Birmingham based body, the WMRA, being imposed as the conduit for this example of central government inspired planning.

Resident

1244 I consider this lack of direct consultation is non-democratic! Its is a mistake to look at housing stock in isolation without considering sustainable development to go with it. Where will the jobs be found to support this proposed huge increase in population and where will they be sited? Why is there no

Resident

1254 I am sorry I cannot understand any of this questionnaire so it is not possible to comment on plans.

Resident

1255 By not producing a public consultation in Plain English you are producing too much waste. This documentation and the questionnaires are unpenetrable.

Resident

***Response  
Capacity***      ***Response***      ***Other Comments***

1261 There has also been badly designed development of out-of town shopping at Ventura Park. The design of entrances and exits to Ventura create huge traffic hold-ups, not just at weekends, and the whole area is not pedestrian friendly. The town centre is a conglomeration of cheap shops, estate agents, mobile phone shops and charity shops. The Council does not even try to keep signs and frontages in keeping with Tamworth's great age and history.

Resident

1335 I also feel that this consolation period is too short and that you have not brought such an important issue to the notice of all residents.

Resident

1336 I also feel that this consolation period is too short and that you have not brought such an important issue to the notice of all residents.

Resident