

<b>Changes to Spatial Options (Post SA)</b>				
<b>Recommended change</b>	<b>Suggested by</b>	<b>Comment</b>	<b>Change made</b>	<b>Date</b>
RES should read WMES to be consistent with WMES Options		n/a	RES changed to WMES throughout	181006
RSS should read WMRSS for consistency with other documents		n/a	RSS changed to WMRSS throughout	181006
<b>Context Section</b>				
Addition of "Lisbon Agenda" into context section	WMRA Secretariat		Text inserted	181006
Addition of New Growth Points explanation	GOWM/ WMRA Secretariat		Text inserted	261006
<b>Employment Section</b>				
Amended figures in RELS table	Policy Lead	To provide clarification	Table amended	181006
Insertion of text to explain the reservoir approach. SA Mitigation In defining employment land requirements it is not apparent that any account has been taken of areas of deprivation or any focus of resources on areas of need. An additional criterion should be added to table E8. Provide a clearer definition of "sustainable access"	Policy Lead  SA	To provide clarification	Text amended  Table E8 amended Sustainable Access deleted addition <i>Areas of deprivation and employment need</i>	231006  241006
Insertion of text to question MIS3 to provide clarification.	Policy Lead/WMRA Secretariat	To provide clarification	Text added to MIS3: <i>For example: the current policy restricts occupation of an MIS to a single user. Do you agree that this should continue to be the case?</i>	011106
<b>Strategic Centres</b>				

<p>SA Mitigation The paper should include employment need as an issue in focusing resources between strategic centres, with a preference for the option with a focus on areas of regeneration need.</p> <p>The paper should give a stronger emphasis to the potential transport impacts of development of strategic centres and underline the importance of minimising travel and promoting greater use of public transport in accessing developments.</p>	SA	Additional text added	<p>The distribution of new households, see page 231006 aaa, will affect which centres will grow and how, <i>as will related employment needs based on new population or regeneration needs.</i> Strategic Park and ride policies and Parking Standards policies <i>together with improvements to public transport</i> will also have an impact on centres.</p> <p>Additions in italics</p>
<p>SA Mitigation Accompanying policy should emphasise the opportunities to minimise and offset greenhouse gas emissions from construction and use of developments in strategic centres.</p>	SA	No change proposed in the Strategic Centres section, suggest this is a general development principle that should be incorporated earlier in the document.	231006
<b>Offices</b>			

<p>SA Mitigation</p> <p>The policy approach should give a clearer focus to employment need as a factor in allocating office space provision, particularly as the need to capture economic development opportunities is identified as a reason for allowing the provision of out-of-centre office space.</p> <p>The options paper would be improved by a clearer explanation of how allocations will be affected by housing growth projections.</p>	SA	Additional text added	<p>The projections are trend based and do not currently fully take into account physical or policy constraints that might limit a centre or a Local Authority's ability to accommodate such levels of development or economic aspirations of particular centres or authorities. The Spatial Options gives the opportunity for this evidence base to be subject to practical and policy consideration, <i>in particular incorporating employment need. Within this context preferred office allocations will have to take account of housing growth distribution.</i></p> <p>Additions in italics</p> <p>231006</p>
<p>SA Mitigation</p> <p>The options paper would be improved by clarification of the expected impact of the different options for approaches to out-of-centre provision on the balance of provision in or out of town centres.</p>	SA	No change proposed as the impact must await individual local assessments of centre capacity.	<p>231006</p>
<p>SA Mitigation</p> <p>The paper should give a stronger emphasis to the potential transport impacts of office development. Policy should underline the importance of minimising travel arising from new developments and promoting greater use of public transport in travelling to offices.</p> <p>Accompanying policy should promote the reuse of buildings for offices.</p>	SA	Additional text added	<p>Accessibility also needs to be taken into account, for staff and movement of goods, this may have an impact on emissions and therefore contribute to climate change. <i>Travel arising from new developments should be minimised with the use of public transport in travelling to offices sought.</i> A growth in office development will also impact on the amount of commercial and industrial waste produced, see section on waste, and how it is managed may have an impact on Climate Change. <i>The promotion of the reuse of buildings for offices could reduce land take and environmental impact.</i></p> <p>Additions in italics</p> <p>231006</p>
SA Mitigation	SA	No change proposed in the	231006

<p>Accompanying policy should emphasise the opportunities to minimise and offset greenhouse gas emissions from construction and use of offices.</p>		<p>Strategic Centres section, suggest this is a general development principle that should be incorporated earlier in the document.</p>	
<p><b>Casinos</b></p>			
<p>Areas of employment need and proximity to the potential workforce could be included as a criterion for choosing casino location. Choice of location could also include proximity to areas of deprivation to maximise the regeneration potential, although it is debatable whether it is desirable to locate casinos in areas of deprivation because of the uncertainty of impacts. The economic case needs to be more clearly made.</p>	<p>SA</p>		<p>The Government short listed applications for Regional Casinos shows that the scale of development is often thought to need, or be most appropriate, in specialist out of centre locations. The deliberations of the Casino Advisory Panel are expected to be published at the end of 2006 and may provide further guidance on the preferred locations of the various types of casino and the ways in which the economic and social effects of such developments should be taken into account. <i>In the light of the latter, any future bids from the Region would need to have to consider areas of employment need and proximity to the potential workforce and areas of deprivation in order to maximise any regeneration potential.</i> Additions in italics</p> <p>231006</p>
<p>SA Mitigation Development will need to consider the potential impact on road congestion and pollution and promoting the use of public transport to reach casinos. Promotion of sustainable transport and alternatives to the car could be included as a criteria for the location of development or for planning applications. The generation of noise and light should also be considered in</p>	<p>SA</p>		<p>When the Local Planning Authority is considering a proposal, account will need to be taken of the potential impact of such development on health, issues of dependency, depression etc, and impact on or relevance to particular sections of the community e.g. the Islamic community and other religious groups opposed to gambling and using the proceeds from gambling. <i>Development will also need to consider the potential impact on road congestion and pollution and promoting the use of public transport to reach casinos. The promotion of sustainable transport and alternatives to the car would be beneficial in this respect. Other forms of pollution such as</i></p> <p>231006</p>

development control decisions.			<i>from noise and light could be generated by the larger casinos and need to be considered.</i> Additions in italics
SA Mitigation Optimising the use of previously developed land could be included as a locational criterion, as well as requiring compensation for features lost such as amenity value and accessible green space in planning consent.	SA	No change proposed, suggest this is a general development principle that should be incorporated earlier in the document as an over-arching principle.	231006
<b>Housing Section</b>			
Tables One and Two replaced to show single Black Country Housing figures, with indicative figures in the notes	Black Country Consortium	To avoid any possible mixed message with the Phase One Revision.	Tables One and Two amended 231006
<b>Transport Section</b>			
Strategic Park and Ride SA mitigation Criteria for location of car parks should continue to include environmental criteria, particularly the potential for impacts on natural and historic assets and including the effects of loss of open space and greenfield land. If necessary, loss of value should be required to be compensated for in development control policy. To maximise the potential for park and ride schemes to contribute to a reduction in traffic levels, other measures to restrict traffic growth are required in tandem with park and ride such as those encouraged by policy T7.	SA/Policy Lead	No change proposed as these considerations are being explored as part of the options	021106
Parking Standards SA mitigation	SA/Policy Lead	Amended to provide clarification	This approach sets out criteria for local authorities to consider when setting out local 241006

<p>The options paper should be clearer on the role of economic and social need as factors in determining the levels of parking provision, how these might be defined, what effect they might have on parking standards and what benefits are expected. The need to protect heritage areas and improve townscapes and the urban environment more generally should be included as a factor in determining parking standards.</p>			<p>parking standards in their Local Development Frameworks, and Local Transport Plans. This approach does not intend to provide specific standards in the RSS policy, but provide regional guidance about the criteria that need to be considered when local authorities establish parking standards that differ from those set out in PPG13: Transport. <i>In developing standards authorities would also need to consider the environmental impact of parking standards, particularly on heritage areas.</i> Additional text in italics</p>
<p>Demand Management SA Mitigation The options paper should clarify the potential policy options and possible approaches to congestion charging policy, including any supporting measures such as investment in public transport infrastructure. The links between congestion charging and policies on housing and employment land distribution should be clarified. The potential for knock-on effects in rural areas should be clarified.</p>	SA	No change proposed. This is covered by the criteria in the existing policy	021106
<p>Airports SA mitigation It is not clear from the options paper what aspects of airport development are non-negotiable and what is an option. The paper would benefit from clarification of whether there are alternative options to that proposed in the options paper under the suggested revisions to T11.</p>	Policy Lead	Amendment to provide clarification	<p>When considering your response please consider the social, economic, and environmental implications of Airport development <i>within the context of the strategy set out in the ATWP. Whilst air travel contributes significantly to climate change through emissions it does have social and economic benefits.</i> Airports provide an economic and social link between ethnic minority and migrant communities to countries of origin.</p>

<p>The options paper would benefit from greater clarity on the predicted economic impacts, both the benefits and the disadvantages. There should be some reference to ensuring that opportunities are available to areas of employment need.</p> <p>The options paper would benefit from a clearer statement of the potential surface access issues and impacts on car use, public transport and the road network. It should be clarified whether targets for surface access modal splits apply only to BIA or to each airport.</p>			<p>Additional text in italics</p>
<p>SA Mitigation</p>	<p>Policy Lead</p>	<p>Amendment to provide clarification</p>	<p>The ATWP requires major airports to produce masterplans, however, in this Region this requirement only applies to BIA. It may be helpful for local planning and transport authorities if all airports produced some form of 'masterplan' that considers the wider impact of airport development e.g. off-site car parking. One possible approach is for the RSS to include a policy that requires all airport operators to produce a document that sets out the airports long term development aspirations for their whole area of influence, in partnership with Local Planning Authorities. This would provide a consistent approach to the consideration of airport development across the Region. It is expected that this document will inform the relevant Local Development Framework and the Local Transport Plan. <i>These documents can then consider the wider development implications and priorities.</i></p> <p>Additional text in italics</p> <p>241006</p>
<p><b>Waste</b></p>			

<p>SA Mitigation</p> <p>To include a specific objective to promote waste minimisation and to move waste up the waste hierarchy, thereby maximising the re-use and recycling of all waste streams</p>	<p>SA</p>		<p><i>The RSS will have to guide the pattern of waste management in the Region in accordance with the Waste Hierarchy (waste prevention; Re-use; Recycle/compost; Energy Recovery; Disposal) which forms part of the Waste Strategy for England.</i> Additional text in italics, 2<sup>nd</sup> para</p> <p>251006</p>
<p>SA Mitigation</p> <p>To include a specific objective to promote waste minimisation and to move waste up the waste hierarchy, thereby maximising the re-use and recycling of all waste streams</p>	<p>SA</p>		<p>The Region has almost half of England's <b>Energy from Waste</b> capacity varying in size from under 100,000 tonnes per year to 400,000. In the future Telford is examining the possibility of a new small facility to manage its own waste. The Black Country Authorities have commissioned a study to explore their common waste management requirements but have not <i>settled on the technology</i> or decided whether they will commission a single large facility or a number of smaller facilities at this stage. Additional text in italics</p> <p>251006</p>
<p>SA Mitigation</p> <p>To include a specific objective to promote waste minimisation and to move waste up the waste hierarchy, thereby maximising the re-use and recycling of all waste streams</p>	<p>SA</p>		<p>We create more than twice as much waste at <b>work</b> as at home. <i>The Government is seeking to break the traditional link between growth in economic activity and growth in Commercial and Industrial waste arisings.</i> Commercial and Industrial waste from restaurants, canteens and food shops is landfilled and also gives off methane, therefore it is just as important to divert this waste from landfill. Many facilities which manage Municipal Waste could also manage Commercial and Industrial waste but it is generally cheaper to landfill waste than to use one of the alternative technologies. The highest proportion of waste in mainland Europe is incinerated to generate Energy from Waste but this is unpopular in the UK. Even if we recycle 50% of our household waste nationally, which is the highest that even the best performing authorities expect to achieve, we</p> <p>251006</p>

			will have to build new treatment facilities locally (such as composting or anaerobic digestion plants) to achieve the Government's target to divert 2/3rds of Municipal Waste from landfill. Additional text in italics	
SA Mitigation  To include a specific objective to promote waste minimisation and to move waste up the waste hierarchy, thereby maximising the re-use and recycling of all waste streams	SA		In this Region there has been a general pattern of waste being created in the MUAs and transported to old quarries in the shire counties to be landfilled. <i>Because there is more landfill capacity in the Region than elsewhere in England and the cost of landfill is relatively cheap.</i> The main principle underpinning the approach to Waste Options is that each WPA should in future identify sites to manage all the waste arising within their own area, or sub-region, <i>(Municipal, Commercial &amp; Industrial, Construction &amp; Demolition)</i> and only the residues from those treatment processes should be landfilled. There will need to be a variety of new facilities from small composting sites to large recycling and recovery plants. Additional text in italics	251006
SA Mitigation  To include a specific objective to promote waste minimisation; to move waste up the waste hierarchy, thereby maximising the re-use and recycling of all waste streams and to minimise the transport of waste	SA		<b>W1: Should the RSS set out the principle that each Waste Planning Authority, or sub region, <i>should manage waste in accordance with the Waste Hierarchy</i> and allocate enough land in its Local Development Documents to manage an equivalent tonnage of waste to that arising within its boundary, taking into account the appropriate growth in waste arising from the formation of new households and the diversion of Commercial and Industrial waste from landfill?</b> Additional text in italics	251006
SA Mitigation  To expand on the commitment to	SA		This is waste collected by local councils; up until 2002 it was increasing at 3% per year but from 2003 it is now increasing at about 2% per	251006

support the local/regional processing of recyclates and markets for recycled material			<p>year <i>except when there is a 'one off' increase when authorities introduce 'green waste' collections.</i> The decisions made about the amount and distribution of houses being built in the Region, will affect the amount of Municipal Waste produced. Challenging targets are set by Government for diverting biodegradable waste (paper, card, green waste and kitchen waste) from landfill. These targets can be partially met by having waste collected separately and by sorting and processing waste before the residue is landfilled. <i>The targets are so challenging that segregated collections on their own will not be sufficient and there will also be a need for the waste to be treated before it is landfilled.</i></p> <p>Additional text in italics</p>
<p>SA Mitigation</p> <p>To expand on the commitment to support the local/regional processing of recyclates and markets for recycled material</p>	SA		<p>Construction and demolition waste 251006</p> <p>In order to meet housing Options Two and Three more land will be required for <i>residential development.</i> In addition to brownfield sites this will include greenfield sites, due to urban capacity. The quantity of C&amp;D waste arising from the housing Options Two and Three should not grow in proportion to the number of new houses because there will be not be a proportionate increase in demolitions outside the MUAs, and the majority of the additional waste should be from uncontaminated earth, which can be recycled and re-used. The construction industry itself also has improved site supervision resulting in less waste being generated and more being re-used and recycled.</p> <p>Additional text in italics</p>
<p>SA Mitigation</p> <p>To expand on the commitment to minimise greenhouse gas</p>	SA		<p>Landfill 251006</p> <p>WMRSS Policy WD3C expresses a presumption against granting planning permission for new landfill sites unless there</p>

emissions from the transportation of waste.			<p>are special circumstances or an established local need. The depletion of landfill capacity will be the subject of regular monitoring. On the basis of the information available this policy will be retained but it will need to be built on in the Preferred Option <i>because the existing capacity is being depleted more quickly than was anticipated and the regulations controlling the granting of Pollution Prevention Control is reducing the existing permitted capacity and restricting new capacity from being brought forward.</i></p> <p>Additional text in italics</p>	
<p>SA Mitigation</p> <p>To expand on the commitment to support the local/regional processing of recyclates and markets for recycled material SA Mitigation</p>	SA		<p>The WMRSS could include a policy which requires all Planning Authorities in the Region to require a Site Waste Management Plan for developments in excess of <i>1 hectare</i> or 1,000 sq. metres of development to be included in their Planning Application Requirements (Local); and for developers implementing all permissions involving the management, processing or recycling of waste to submit annual returns on the level of activity. If it did, this would enable the LPA to confirm that the proposed development complied with the DTI's Code of Practice.</p> <p>Additional text in italics</p>	251006
<p>SA Mitigation</p> <p>To expand on the commitment to support the local/regional processing of recyclates and markets for recycled material SA Mitigation</p>	SA		<p><b>W16: Should all Local Planning Authorities in the region prepare and publish on their web sites a Planning Application Requirements (Local) schedule which provides for all Full or Reserved Matters planning applications for developments in excess of 1 hectare or <del>Outline planning applications for sites in excess of 0.4 hectares of development</del> 1,000 sq. metres of development to include a Site Waste</b></p>	251006

			<b>Management Plan, without which they will not be registered as valid?</b> <i>Additional text in italics</i>
<b>Appendices</b>			
Tables One and Two replaced to show single Black Country Housing figures, with indicative figures in the notes	Black Country Consortium	To avoid any possible mixed message with the Phase One Revision.	Tables One and Two amended 231006