

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

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

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

<b>Critical Rural Services</b>	<b>Page 2</b>
<b>Gypsies, Travellers and Travelling Showpeople</b>	<b>Page 3 - 4</b>
<b>Culture Sport and Tourism</b>	<b>Page 5</b>
<b>Quality of the Environment</b>	<b>Page 6 -11</b>
.....	
<b>Minerals</b>	<b>Page 12 - 15</b>
.....	

Within each section there are a series of questions, each one has a unique reference (e.g. CRC1 for critical rural services). If you need more space to respond to any of the questions please attach extra sheets and refer to the question reference number.

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

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

### **Your Details**

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

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

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

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

Please tick one box  \* Yes

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

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

Please tick one box  \*No

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

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

Please tick one box  \* Yes

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

**New developments may achieve greater sustainability for smaller remote rural communities. Any new developments however, should consider the service needs and demands and be built into the development process.**

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

Please tick one box

\*Option 2: Community Based

Please provide reasons for your preference

**Integrating options 1 and 2 would be the preferred response, ensuring local communities take into account climate change issues. However, option 2 would foster service development and protection of existing services throughout the rural settlement hierarchy.**

There would need to be a policy that would be an ‘umbrella’ policy but also would need to be implemented at a sub regional level allowing for flexibility in countywide plans.

This option could be developed and the current work on Community led plans, community strategies LTP’s and LDF’s could be utilised. Using models of good practise in existence through the Community Led Planning process which can cover both rural and urban areas, the idea of community wish lists could be avoided.

A more consistent regional approach to CLP could support this, and is being developed by the WMRCAN. In addition, the infrastructure agencies could be supported to deliver this evidence base with communities in an independent way.

This Community based ‘bottom up’ approach however, does not necessarily give enough emphasis on climate change issues. This needs to be reflected therefore in the regional policy.

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

**Regional policy should provide a framework to enables the principles of sustainable development to be implemented and allow for sub regional policies to sit under this allowing countywide variances to accommodate local community solutions at a county level. Local development frameworks should be required to take account of the results of community led planning in support of government policy for greater community empowerment and engagement.**

The regional policy should be based on the broad approach of economy, social and environmental factors to create sustainable communities. This is in line with the WMRAF consultation response based on the principles of sustainable development.

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## **Gypsies and Travellers**

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

Please tick one box  \* Yes

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

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

Please tick one box  \*Yes

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

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

Please tick one box  \*Option 1

Please provide reasons for your preference.

**This Option is based on the needs identified by this community themselves and not a top down approach.**

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

**No comment**

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

Please tick one box     Yes             No

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

**No comment**

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## **Gypsies and Travellers continued**

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

Please tick one box     Yes             No

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

**Please see attached Additional Information.**

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

Please tick one box     Yes             No

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

**No comment**

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## **Travelling Showpeople**

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

Please tick one box     Yes             No

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

**No comment**

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

Please tick one box     \* Option 1

Please provide reasons for your preference or if you think there is another Option which could be

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

**This options addresses the needs this community has identified themselves (GTAA's consultation)**

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

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

Please provide reasons for your preference.

**No comment**

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**regional economy. We would support the inclusion of an aim to increase participation in cultural and sporting activities in both urban and rural areas’.**

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

Please tick one box  Yes  No

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

**Current focus is on economic outputs from C,S and T. and not community participation and the role of C, S and T in developing and maintaining sustainable communities.**

**No account taken of sub regional assets.**

**No local level inclusion.**

**It emphasises sport as a recreational activity to be 'watched' rather than participation.**

**Does not address social and community benefits of C, S and T.**

**Focus is on urban areas not sub regional or local level.**

**C,S and T have significant impact and importance at a local community level, new policy needs to embed this at regional level policy.**

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

Please tick one box  Yes  No

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

**Regional guidance is needed to identify new for new assets.**

**Access and management of assets issues needs to be addressed at sub regional level through LSDF's.**

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

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

Please tick one box    \*O Yes

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

**No comment**

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

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

Please tick one box    \*O Option 1: Needs Led

Please provide reasons for your answer.

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

Please tick one box    O Yes            O No

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

**No comment**

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

Please provide reasons for your answer.

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

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

Please tick one box     Yes                       No

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

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

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

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

Please tick one box     Yes                       No

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

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

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

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

Please tick one box     Yes                       No

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

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

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

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

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

If you disagree, please provide reasons for your answer.

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

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

Please tick one box     Yes             No

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

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

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

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

Please provide reasons for your answer.

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## **Policy QE8 – Forestry and Woodlands**

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

Please tick one box     Yes             No

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

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

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## **Protection of Agricultural Land**

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

Please tick one box     Yes             No

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

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

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

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

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## **Policy QE9 – The Water Environment**

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

Please tick one box     Yes             No

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

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

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## **Air Quality**

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

Please tick one box     Yes             No

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

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

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## **Integrated Approach to the Management of Environmental Resources**

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

Please tick one box     Yes             No

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

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

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

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

Please provide reasons for your answer.

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## Flood Risk

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

Please tick one box     Yes             No

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

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

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## Energy

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

Please tick one box     Yes             No

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

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

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

Please provide reasons for your answer.

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

Please tick one box     Yes                     No

Please provide reasons for your answer.

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

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

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

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

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

Contribution to the global environment

Contribution to the local economy

Impact of fauna, flora and animal life

Noise

Odour

Traffic Implications

Visual Impact

Other factor(s) (please specify below)

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## **Positive Uses of the Green Belt**

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

Green Belt policy (PPG2) and the environmental enhancement policies (Option 2), and why?

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

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

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## Safeguarding Mineral Resources

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

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

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

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

Please tick one box     Yes                       No

If yes, please provide reasons for your answer.

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

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

Please tick one box     Yes                       No

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

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If no, please give reasons for your views.

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

Non–Mineral Development in a MCA comprising more than:

5000 sq metres for offices/retail/tourist/leisure/development

2 hectares for any Use Class B1, B2, B8

1 hectare for any residential development

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

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## Safeguarding Mineral Resources continued

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

These could be for example:

Sites / facilities for concrete batching

the manufacture of coated materials

other concrete products

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

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

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

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

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

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

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

Please tick one box      Yes                      No

If yes, what matters should the policy address?

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**Question M8:** In updating Policy M4 (Energy Minerals) in the existing WMRSS is there a need to place more emphasis on realising the opportunities available from existing technologies to release energy sources from worked and unworked coal seams in the coalfields of the West Midlands? Are there any other matters which an updated Policy M4 should address?

Please tick one box      Yes                      No

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

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

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

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## Future Supplies of Construction Aggregates

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

Please tick one box     Yes             No

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

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

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

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

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

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

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

- Future Patterns of Housing and Employment growth
- Existing Mineral Infrastructure
- Local Resource Availability
- Environmental Acceptability and Designations
- None of the above
- Other (please specify)

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

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

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

Please provide reasons for your answer.

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## **Future Brick Clay Provision**

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

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

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

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

Please provide reasons for your answer.

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

Please tick one box     Yes                     No

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

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

### **Suggested Planning and Environmental Criteria To Identify Broad Locations For Stockpiles Of Clays (Including Fireclays)**

- Proximity to brick clay supplies
- Proximity to existing brickworks
- Good access to road/rail

- Proximity to existing/future markets
- Long term accessibility
- Locations where it is possible to minimise/avoid significant environmental impacts
- Other (please specify)

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

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

**WMRSS Phase Three Revision**

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

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

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

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

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