

**WALSALL COUNCIL**

**DRAFT RESPONSE TO WMRA RSS PHASE 2 REVIEW  
SPATIAL OPTIONS**

**West Midlands Regional Spatial Strategy  
Phase Two Revision  
Spatial Options  
8<sup>th</sup> January – 5<sup>th</sup> March 2007**

**(Extracts and Walsall Responses)**

# Introduction

**Do you want to influence the future development of the West Midlands?**

**Do you have a view about how and where the Region should grow in the next twenty years?**

**This is your chance to have a say and help us shape policies for the Regional Spatial Strategy.**

This document sets out some of the issues that will be addressed in the alterations to the Regional Spatial Strategy. These issues can be complex and often do not have clear answers.

**We need to know what you think.** Having read the Spatial Options and formed a view, you can send your completed response form by email or post to:

West Midlands Regional Assembly  
Regional Partnership Centre  
Albert House  
Quay Place  
Birmingham  
B1 2RA  
[wmrss@wmra.gov.uk](mailto:wmrss@wmra.gov.uk)

## **How will my response be used?**

All responses will be considered when drafting the Preferred Option. A Preferred Option is the policies and text that will be given to the Secretary of State setting out what the RPB partners would like to see included in the revised West Midlands Regional Spatial Strategy.

## **Is this my last chance?**

No, before the RPB sends its Preferred Option to the Secretary of State there will be a short informal consultation period on the Preferred Option. Once the Preferred Option is given to the Secretary of State, December 2007, there will be another formal consultation period of approximately twelve weeks.

## **How can you get involved?**

How we will involve people is set out in the Statement of Public Participation in the Project Plan.

The Spatial Options have a formal consultation period of eight weeks, starting with a launch event on the 8<sup>th</sup> January 2007 and finishing on the 5<sup>th</sup> March 2007 (TBC).

If you would like to receive future updates about the WMRSS revision please contact [wmrss@wmra.gov.uk](mailto:wmrss@wmra.gov.uk) , 0121 678 1042 and ask to be included on the consultation database.

## What is the Regional Spatial Strategy?

The West Midlands Regional Spatial Strategy (WMRSS) is part of the statutory development plan and incorporates the Regional Transport Strategy. It provides a framework for all Local Development Frameworks and Local Transport Plans and aims to influence wider strategies plans and programmes. The Regional Planning Body is responsible for the development, implementation and monitoring of the WMRSS. It is the Government who publishes it and therefore is Government policy.

The WMRSS vision underpins the Revision and the Spatial Options.

**“The overall vision for the West Midlands is one of an economically successful, outward looking and adaptable Region, which is rich in culture and environment, where all people, working together, are able to meet their aspirations and needs without prejudicing the quality of life of future generations.”**

The objectives of the WMRSS are set out in the Project Plan. They will remain unchanged by this Revision and the Spatial Options have been written with this in mind.

How the WMRSS aligns with and links with other Regional Strategies, including the West Midlands Economic Strategy (WMES), is set out in the Project Plan. The WMES sets out what the Region needs to do to improve its economic performance. It is led by Advantage West Midlands.

## Why is there a Phased Revision?

Following the publication of the WMRSS in June 2004, the Secretary of State recommended that some issues should be immediately looked at and developed further. The Regional Planning Body (RPB) took the decision to carry out this task in a phased way. **Phase One** concentrates on the Black Country Study, where the aim was to identify and ‘fast-track’ urban renaissance proposals through to implementation. **Phase Two** is considering housing, employment, transport and waste, while **Phase Three** will look at a range of other issues including; critical rural services, provision for gypsies and travellers, recreational provision, quality of the environment, climate change and possibly more. The Project Plan for Phase Three is programmed to be launched for consultation in Spring 2007.

These Spatial Options are concerned with **Phase Two** of the Revision. These Spatial Options only look at issues that the Secretary of State identified, the current West Midlands Regional Spatial Strategy and the policies within it remain unchanged. To understand the full range of spatial policies that affect the Region the current WMRSS must be read at the same time as the Spatial Options. It can be seen at [www.wmra.gov.uk/page.asp?id=47](http://www.wmra.gov.uk/page.asp?id=47)

## Phase Two Project Plan

The Project Plan is a separate document that sets out the issues being covered by Phase Two, the resources needed, the timetable aimed for, the Sustainability Appraisal and how we will involve people in the process. It can be seen on the web [www.wmra.gov.uk/download.asp?id=872](http://www.wmra.gov.uk/download.asp?id=872) if you would like a paper copy please let us know.

## **Who has written this document?**

The West Midlands Regional Assembly (WMRA) is the Regional Planning Body (RPB) for the Region and has legal responsibility for preparing revisions to the WMRSS. It has set up the Regional Planning Partnership (RPP) to oversee this work.

This document has been written on behalf of the RPB by the WMRSS Policy Leads (see the Project Plan for who they are) and coordinated and edited by the Policy Directorate of the WMRA.

At each stage of drafting, the WMRSS Task Group have been asked to give their views. The WMRSS Reference Groups contributed views during the final stages of drafting. Together these groups represent a wide range of interests and perspectives as well as different parts of the Region.

For more information about these groups see [www.wmra.gov.uk/page.asp?id=48](http://www.wmra.gov.uk/page.asp?id=48)

## **What are Spatial Options?**

To write new policies for the WMRSS there is a process set out by Government that has to be followed, see in Planning Policy Statement 11: Regional Spatial Strategies, [www.communities.gov.uk/embedded\\_object.asp?id=1143844](http://www.communities.gov.uk/embedded_object.asp?id=1143844)

Spatial Options set out choices or directions that can be taken for the Region. They are about exploring the issues surrounding the objectives of the Revision, see the Project Plan.

Because the Region is a diverse place with different needs and aspirations in different communities, Spatial Options can be complex. Many different factors have gone into writing them and when making choices there are a lot of factors to weigh up. Some of these relate to; jobs, protection of the environment or meeting peoples needs for better houses and services. In many cases the issues and solutions are connected and it may not be possible to meet all of the needs at the same time.

## **Where should new development occur, in what form, at what scale and with what impact?**

**This is what the Spatial Options are about and aim to explore.** The questionnaire attached will help us understand different people's views and to develop the Preferred Option.

## **What is a Preferred Option?**

The Preferred Option is a series of new and amended WMRSS policies and text that is submitted to the Secretary of State. This is supported by Monitoring and Implementation Frameworks. It must be based on robust evidence and is tested for "soundness" by the Examination in Public Panel.

## **What information goes into writing Spatial Options?**

The RPB asked the Strategic Planning Authorities to give advice, responding to Section 4(4) Briefs, on the issues that these Spatial Options cover. For more information about this advice and the process see the Project Plan and [www.wmra.gov.uk/page.asp?id=208](http://www.wmra.gov.uk/page.asp?id=208) .

Technical work was commissioned to explore the issues and make sure that there is a sound basis for putting forward these Spatial Options for the Region. There are also technical papers covering Housing and Waste giving more information to support these Spatial Options. See [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121) or contact us for paper copies.

A background report is being prepared looking at environmental and transport infrastructure implications of the Spatial Options. This and other work will be carried out to help decide the Preferred Option. As this work is finalised it will be available on the website.

### **What is the relationship with the draft Phase One Revision: The Black Country?**

The draft Phase One Revision, relating to the Black Country, was submitted to the Secretary of State on the 31<sup>st</sup> May 2006 and proposes policy changes in respect of Urban Renaissance, strategic centres, the presentation of housing requirements and transport.

Before Phase Two Revision began in November 2005 the RPB considered how, in practice, the phased approach to the revision process should be managed. This led to a Protocol being adopted incorporating the following principles:

- a. Phase One policy decisions should not be reviewed by Phase Two, unless there are exceptional circumstances;
- b. Technical evidence should be developed on a consistent basis and, where appropriate, shared between phases.

In line with the above principles, the policy positions within the Phase One submission have fed into the development of the Phase Two Spatial Options and, where appropriate, are referred to in each of the relevant sections of this report. Given the evidence base for the Black Country Study extends to 2031 this can also form part of the evidence base for Phase Two.

An Examination in Public (EIP) into the draft Phase One submission begins on the 9<sup>th</sup> January 2007. If the subsequent Panel Report is published by Summer 2007, there may be important conclusions and recommendations emerging from this that can be taken into account in the development of the Preferred Option within Phase Two.

See [www.blackconsortium.co.uk](http://www.blackconsortium.co.uk) for documents and evidence base.

### **Map of the Region showing relationship with other regions/ distinction between MUAs/other areas**

# Sustainability Appraisal

## What is it?

Sustainability Appraisal (SA) is an integrated part of the process for revising the policies in the WMRSS. It involves looking at the Spatial Options as they developed and making sure that sustainable development principles were taken into account. Where issues are raised through the SA they are then taken into account in the next draft of Spatial Options. The SA includes a Strategic Environmental Assessment (SEA) in line with the SEA Directive.

More information about the SA process can be found in the Project Plan.

## What has been done?

A SA Scoping Report was produced and consulted on in February/March 2006. This set out an SA Framework against which the Spatial Options have been assessed. The SA has been carried out on the Spatial Options included in this document. At each stage of development comments were fed in and the Spatial Options altered.

## Who did the SA?

The SA is being carried out by consultants guided by the SA Steering Group including representatives with environmental, social and economic expertise. The consultants were involved in meetings where the Spatial Options were being discussed and therefore were able to be fully part of the Spatial Options development process. They also formally assessed the Spatial Options, after each WMRSS Task Group. The SA Steering Group approved any comments made and has responsibility for the final SA Report.

## What happens next?

The SA is an ongoing part of the Revision process, and will continue to influence the drafting of policies and the development of the Preferred Option. When the Preferred Option is submitted to the Secretary of State an SA Report is part of the submission. It will be considered as part of the test for soundness of draft Revision at the Examination in Public.

## Where can I find out more?

For a full version of the SA of the Spatial Options and the Scoping Report please contact us or see [www.wmra.gov.uk/page.asp?id=245](http://www.wmra.gov.uk/page.asp?id=245) .

# Rural Proofing

## What is it?

The Rural Accord and the West Midlands Rural Affairs Forum chose a group of people with expertise in rural issues to look at the Spatial Options and make sure that rural issues were fairly considered. This took place at the same time as the SA and fed into its results.

## Where can I find out more?

The Rural Proofing report can be seen; [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121) .

## Context

The principles of Urban and Rural Renaissance lie at the heart of the Regional Spatial Strategy.

**Urban Renaissance** – developing our Major Urban Areas (Birmingham, Solihull, the Black Country, Coventry and the North Staffordshire Conurbation) in such a way that they can increasingly meet their own economic and social needs – countering the unsustainable outward movement of people and jobs.

**Rural Renaissance** – meeting the economic and social needs of rural communities whilst enhancing the unique qualities of our towns and villages and the surrounding countryside.

**The WMRSS is not being fully reviewed and one of the most important tests in assessing the Spatial Options is whether they positively support and promote the above principles.**

This section will look at the changes in policy since the WMRSS was published, in June 2004. This includes changes in Government policy, policy development in neighbouring Regions and the development of strategies and policies within the Region.

### **The West Midlands Economic Strategy (WMES)**

The WMES sets out what the Region needs to do to improve economic performance by both building on strengths and addressing the market failures that hold back the Region's economy. It is reviewed every three years to make sure that it remains relevant and continues to provide the right solutions. The Region is currently part way through that process. The current review of the WMES will consider the agreed actions which will be required to ensure existing targets for 2010 are met. It will also look beyond that milestone to 2020 to establish what the Region will need to do to continue to improve economic performance within the context of the Urban and Rural Renaissance objectives of the WMRSS. Advantage West Midlands are leading consultation on Policy Options from November 2006 to March 2007.

Work is being undertaken to ensure as much alignment as is possible between the WMES review and the WMRSS Revision, this will carry on throughout the two processes to ensure that the two strategies continue to mutually support each other. Further details of the WMES revision can be found at [www.advantagewm.co.uk/wmesreview.html](http://www.advantagewm.co.uk/wmesreview.html) .

**Phase One Revision: The Black Country** (already submitted to the Secretary of State) develops the principle of Urban Renaissance for that sub-region and sets out a comprehensive and ambitious set of interdependent policies for renaissance and growth. These policies come from the overarching vision and strategy for future growth and competitiveness set out in the Black Country Study, and aim to challenge fundamentally current trends by reversing the relative decline of the area to achieve a positive spiral of transformational change. Given that the Black Country represents a large part of the Major Urban Areas, the success of this strategy will be crucial to the long term sustainable development of the overall Region. It will therefore be important that this strategy is further supported by Phase Two proposals.

**Climate Change:** Climate change is happening now and threatening our economy, communities and environment. We need to avoid catastrophic levels of climate change by reducing our



greenhouse gas emissions; we also need to prepare for unavoidable levels of climate change as the climate system responds to our previous emissions of greenhouse gases. Those changes will bring hotter, drier summers and milder, wetter winters. There will be changes in storms, wind speed and extreme events such as flash flooding and droughts.

The West Midlands review of the Regional Energy Strategy shows that the gap between actual greenhouse gas emissions and reduction targets is widening. The WMRSS has a crucial role in helping to ensure this gap does not widen further. In line with Government Policy and guidance, all development plans in the Region need to strengthen policies that will reduce greenhouse gas emissions and to take on board adaptation to climate change.

This means greater attention to issues such as reducing the need to travel and improving accessibility to more sustainable modes of travel, improving the energy efficiency performance of developments and increasing the use of renewable energy and low carbon, localised networks. Reducing the amount of biodegradable waste going to landfill will help too.

There will also need to be measures that will help the Region to adapt, such as locating, siting and designing developments that offer greater protection from flooding, erosion, storms, water shortages and subsidence. This may include policies that discourage inappropriate development in the floodplain and encourage developments that are located where there is adequate access to infrastructure such as water and drainage systems.

The Spatial Options and the Preferred Option should integrate climate change considerations and take into account improvements in the evidence base and policies already in the WMRSS. These include encouraging the use of Sustainable Urban Drainage Systems (QE9), increasing tree cover (QE8), promoting the reuse of materials (M3 WD1), supporting new industries and technologies that address climate change, and encouraging renewable energy and energy conservation (EN policies).

**The Lisbon Strategy for Jobs and Growth:** UK National Reform Programme looks at the challenges currently facing the UK economy and sets out the Government's strategy for delivering long term sustainable growth, high employment and a fair and inclusive society. In March 2000 a ten year strategy of reform for Europe's labour, capital and product markets was committed to by European Heads of Government and State. The vision was that by 2010, Europe would become "the most competitive and dynamic knowledge based economy in the world, capable of sustainable economic growth with more and better jobs and greater social inclusion". This provides the European context for future development of the Region, for more information see:

[www.hm-treasury.gov.uk/documents/international\\_issues/european\\_economic\\_reform/int\\_lisbonstrategy\\_jobs.cfm](http://www.hm-treasury.gov.uk/documents/international_issues/european_economic_reform/int_lisbonstrategy_jobs.cfm).

### **Local Development Frameworks**

The WMRSS sets out a framework for all Local Development Frameworks (LDFs), Local Transport Plans, Waste and Minerals Development Frameworks. The Preferred Option will be submitted to the Secretary of State in December 2007, following that there will be a consultation period, an Examination in Public and Panel Report before any changes to the WMRSS are published. This takes time and so there will be a delay before these recommended changes are fitted into Local Development Frameworks and the land is allocated for housing, employment, waste facilities or other land uses affected by these Options.

Many mitigation measures in terms of Climate Change, such as sustainable urban drainage systems, passive solar heating, energy efficient designed houses, are guided by policies in LDFs.

### **New Growth Points: Partnership for Growth with Government**

Following a national bidding process, the Government has designated seven areas in the Region as New Growth Points to promote house building above levels in the current RSS. These include Major Urban Areas and most of the sub-regional Foci defined in the WMRSS (Birmingham and Solihull, Coventry, Hereford, Shrewsbury and Atcham, Telford and Worcester) as well as East Staffordshire, Burton-upon-Trent. In total, these authorities have proposed 82,800 new houses to be built in the period 2006-2016 and will receive some £5.5 million of Government funding. The New Growth Points will develop in the context of the WMRSS and the proposed levels of housing growth are considered as part of the development and testing of the Phase Two Revision Spatial Options.

### **City Region**

In response to a national agenda, and the need to accelerate the regeneration of the Major Urban Areas, two 'City Regions' have been proposed for the Region; The Stoke and North Staffordshire City Region and the Birmingham, Coventry and Black Country City Region, including Telford. WMRA considers that these must be set within the context of the existing regional strategic framework laid down by the WMRSS, the WMES and the Regional Sustainable Development Framework (RSDF).

There is potential within the City Regions to support the delivery of the Urban Renaissance objectives of the WMRSS and contribute to housing provision in terms of the Government's proposed household growth figures and as key growth points within the Region. In the case of the Stoke and North Staffordshire City Region this needs to be balanced with the low demand housing market pathfinder in the short to medium term.

### **Midlands Way**

This is the West and East Midlands Regions response to the Government's 2003 Sustainable Communities Plan. It is intended to complement and support other strategies and plans, focusing on those issues where there is a strong case for joint working across the two Regions. It will help the two Regions to work together on the response to the Government Growth agenda, coordinating the regeneration of urban areas maximising the contribution to growth while reducing any negative impact.

### **Milton Keynes South Midlands Growth Area.**

The Milton Keynes South Midlands (MKSM) Sub-Region is one of the four growth areas included in the Sustainable Communities Plan, see below.

The MKSM Sub Regional Strategy was published by the Secretary of State on the 17 March 2005. It is part of, and revises, the three existing RSSs for the East Midlands, East of England and South East as they relate to the Milton Keynes South Midlands area. Work is underway to assess the economic impact of the proposals for MKSM and the impact that it will have on Urban Renaissance. This work is being led by Advantage West Midlands (AWM) and the West Midlands Business Council. It is recognised that the MKSM Growth area may also have rural renaissance implications, for example due to increased inter regional commuting.

## Government Housing Policy

It is Government Policy to ensure that everyone has a decent home at a price they can reasonably afford. It requires that the annual level of new housing development across England should increase by one third by 2016 to 200,000 dwellings per annum, to meet demands and to make housing more affordable particularly for first time buyers. It sees the 2003-based household projections, published in April 2006, as being the indicator of demand. These projections can be found at

[www.communities.gov.uk/index.asp?id=1002882&PressNoticeID=2097](http://www.communities.gov.uk/index.asp?id=1002882&PressNoticeID=2097)

The level of demand, relative to that in the previous projections, is higher in this Region than in many other parts of the country.

The Government also expects that demand arising in every local housing market area should be met in that area; unless there is clear evidence that this cannot be done.

**Planning Gain Supplement (PGS):** a Government proposal consulted on in 2006 alongside draft PPS3. This principle is one of levying or taxing a betterment charge on new development with the Customs and Excise collecting it. The intention is that this is used to fund infrastructure costs with funds allocated to the local authority where raised, to the wider region and a smaller proportion distributed according to Central government priority. A major reason for this proposal is to help the procurement of affordable housing in Section 106 negotiations, alongside essential on site works by taking many of the competing calls on the resources accessed through Section 106 agreements and seeing these funded through the PGS route.

Views on this differ widely, some think this is the best attempt in post-war planning history to address betterment. Others believe the Government is going to depress the commercial incentive for regeneration and use development in the Region to fund infrastructure in the Southern Growth Areas. There is no date set for formal implementation of this proposal.

**Regional Funding Allocations:** In the 2004 Spending Review, the Government announced that it would be examining new ways to integrate transport, economic and spatial development strategies in each of the English Regions. Their aim was to give Regions the opportunity to feed into future spending decisions and show how their priorities can be better aligned to form a coherent, credible and strategic vision for the Region. Following the Government publishing 'Devolving Decision Making: A Consultation in Regional Funding Allocations' (December 2004) they announced their intention to go ahead with the proposals.

The English Regions provided their advice in January 2006. In July 2006 the Secretary of State for Transport responded and indicated he would seek wide views on how the process could be further enhanced. The Department for Transport (DfT) consulted in September 2006 on developing the process. It is expected that the DfT will take account of the responses, before seeking further formal advice from regions on the process, during 2008.

Further information on RFA maybe found at:

[www.dft.gov.uk/stellent/groups/dft\\_localtrans/documents/divisionhomepage/039134.hcsp](http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/divisionhomepage/039134.hcsp) .

**Gypsies & Travellers:** The RPB and Government Office for the West Midlands (GOWM) are in receipt of correspondence from Yvette Cooper (Minister for Housing and Planning) in which she urges the RPB to deliver a Regional Statement on Gypsies & Travellers policy, in advance of the WMRSS Revision process being completed, end of 2007. The majority of local authorities have yet to commence work on their Gypsy and Traveller Accommodation Assessments (GTAA) the

RPB has agreed with GOWM that it will develop an Interim Regional G&T Statement for submission to DCLG by the end of 2006. To enable this Statement to be drafted and in the absence of GTAA data, the RPB plans to use the evidence produced by the G&T research undertaken to inform the Regional Housing Strategy in 2005, complimented by any other G&T data that local authorities already hold or that will become available during Autumn 2006. Gypsies and travellers will be considered in more detail in Phase Three Revision, this may include an assessment of the non permanent housing needs of migrant workers.

**London 2012 Olympics:** The preparations for and legacy of the London 2012 Olympics is likely to have significant implications across the country. The development of stadiums, related facilities and other spin off development will place heavy demands on the construction industry. When this is added to South East growth area commitments there may be impacts on the ability to deliver substantially increased rates of development in the Region. It is possible that some of this shortfall will be made up from migrant labour, which will in itself increase housing demand, albeit probably limited in location and nature.

Development can also be expected across the country as competing nations establish training camps and increased tourism may increase demand for hotel bed space. There may also be significant cultural events and facilities arising from the Olympics. It is likely that there will be many community based sport and culture related activities and developments. These have potential to spark and plug into redevelopment initiatives. With large numbers of people in the country, travel between places is likely to be a key issue. Connections between London and key locations in the West Midlands will be critical if the Region is to maximise benefits from the games.

**Regional Flood Risk Assessment:** The draft PPS 25 places on the RPB a new requirement to undertake Regional Flood Risk Assessment (RFRA). This makes the RPB take account of flood risk when setting out policies in the WMRSS, including the location of housing provision and transport infrastructure and identify the risk to its regionally strategic locations. The RFRA should either form part of the Sustainability Appraisal or be used to inform it.

**Appropriate Assessment:** The Appropriate Assessment (AA) of the WMRSS aims to ensure the protection and integrity of European habitat sites by making the RPB take account of the significant effects on these sites, and be used to inform the WMRSS policy. The AA of the Revision should be undertaken in conjunction with the Sustainability Appraisal, but reported on separately. The process also requires the consideration of sites outside the Region. Guidance indicates that the AA must have an opportunity to inform the Spatial Options and initial screening is planned to take place through the SA/SEA process, before more detailed assessment if required.

**West Midlands Rural Delivery Framework:** Following the Government's Rural Strategy 2004 each English region was asked to develop new arrangements for the funding and delivery of services to rural communities. These are set out in framework documents, giving priorities for action, to make sure these are targeted where needed at local level across each region.

Following intensive consultation with rural partners and drawing on available evidence, the West Midlands Rural Delivery Framework has identified six rural priorities for the region:

- Enhancing the value of the countryside.
- Developing a diverse and dynamic business base.
- Improving learning and skills.
- Creating the conditions for growth.
- Achieving fair access to services for all.

- Securing vibrant, active, inclusive and sustainable communities.

The Framework was published in April 2006, and can be accessed at [www.ruralnetworkwm.org.uk/wmra/wmra\\_home.htm](http://www.ruralnetworkwm.org.uk/wmra/wmra_home.htm) . It is designed to help all strategies, policies and plans to contribute to a sustainable future for rural areas of the Region. Underpinning the Framework is the Government's commitment to rural proofing, see page aaaaa

**Regional Transport Strategies:** The DfT has published guidance on the content of Regional Transport Strategies (RTS). The RTS provides the strategic context for Local Transport Plans, and Local Development Frameworks. See [www.dft.gov.uk](http://www.dft.gov.uk)

## Neighbouring Regions

### The South East Plan 2026

This Plan aims to ensure that the South East remains economically successful and an attractive place to live for future generations. The full set of documents submitted to Government can be viewed at [www.southeastra.gov.uk/southeastplan/plan/view\\_plan.html](http://www.southeastra.gov.uk/southeastplan/plan/view_plan.html) .

The significance for the West Midlands of proposals in the Draft South East Plan is considered to be much less than for proposals being implemented for the Government's four major growth areas, especially Milton Keynes. WMRA considers it is in the interests of the WMRSS, for the South East Region to accommodate the housing growth it generates.

### The North West Plan 2021

The full document is available to download from [http://rpg.nwra.gov.uk/uploads/rpg\\_docs/rp\\_kMqZ\\_Submitted\\_Draft\\_Regional\\_Spati.pdf](http://rpg.nwra.gov.uk/uploads/rpg_docs/rp_kMqZ_Submitted_Draft_Regional_Spati.pdf) .

There are no significant implications at this time for this Region. The WMRA will be keen to take part in any work relating to the commitment to consider Crewe's relationship to the North Staffordshire conurbation as part of a future WMRSS Revision.

### The South West 2026

This draft Plan contains the principle that employment growth at Cheltenham and Gloucester is to be phased with housing growth as this should serve to reduce out-commuting, including that into our Region, this is supported by the WMRA. It will be important to our Region that employment-led growth at Tewkesbury is limited in scale to what can be supported by a small settlement with significant environmental constraints and that it is not permitted to grow into a sub-regional employment centre in its own right, as this would only serve to increase cross-regional boundary commuting.

### The East Midlands

This is currently under review. Consultation on the document started in September 2006. There are close links between Burton upon Trent and the East Midlands and the future development of Burton upon Trent should be considered in the context of both Regional Spatial Strategies.

## Wales Spatial Plan 2004

It establishes a 20 year strategic agenda for the integration of activities and investment which have a geographic dimension. It can be seen at:

[www.wales.gov.uk/themesspatialplan/content/spatial-plan-e.htm](http://www.wales.gov.uk/themesspatialplan/content/spatial-plan-e.htm)

It recognises a range of interactions taking place across the English-Welsh border, especially affecting Herefordshire and Shropshire. They include: cross border service provision including shopping, health and education; transport links, including north-south links within England important for connecting Wales as a country; water and sewerage demands; rural policy; the management of river catchments and inter-dependencies in housing markets and the Rural Affairs Forum cross border study.

## Key Findings from Monitoring

Monitoring of the WMRSS has shown that some significant progress towards the principles of Urban and Rural Renaissance has been made:

- Early evidence that the rate of **migration** from the West Midlands conurbation to the surrounding shire areas is slowing down;
- Patterns and levels of **housing** completions and commitments are adjusting to those required by the WMRSS. There has also been significant progress in increasing the use of previously developed land and density of development;
- Development of **employment land** in the Major Urban Areas (MUAs) has increased. This has been accompanied by a decline elsewhere, in line with the WMRSS;
- The pattern of **retail commitments** for the future suggests that higher in-centre rates of retail development will be achieved meeting the WMRSS requirements;
- Significant progress made in increasing **waste recycling levels**, although there is a substantial requirement for new waste management capacity.

However, monitoring of the WMRSS demonstrates that significant progress has yet to be achieved in a range of areas including:

- **Provision of affordable housing** which has consistently been at a rate very much lower than the target expressed in the WMRSS;
- Very high proportion of **office development**, both achieved and in the development pipeline, continues to be “out-of-centre” reinforcing unsustainable travel to work patterns;
- Whilst good progress is being made on the implementation of individual **transport** infrastructure schemes the outcome indicators (eg congestion, length of travel to work journey; modal switch) suggest that there is still a long way to go.

See [www.wmra.gov.uk/page.asp?id=52](http://www.wmra.gov.uk/page.asp?id=52) for Monitoring reports.

# Spatial Options

The Spatial Options are grouped around the chapters of the WMRSS. However, they are all connected and when thinking about your comments please think about what you have said to other topic areas.

The topics were chosen by the Secretary of State when publishing the WMRSS in June 2004, as areas that needed further clarification or policy. This is a partial Revision and therefore the topics may seem disconnected. The WMRSS should be looked at for the whole picture, see [www.wmra.gov.uk/download.asp?id=14584](http://www.wmra.gov.uk/download.asp?id=14584)

**Questions are asked in each section as well as being in the detachable questionnaire. The questionnaire is also available on the web [www.wmra.gov.uk/page.asp?id=56](http://www.wmra.gov.uk/page.asp?id=56) and can be emailed to [WMRSS@wmra.gov.uk](mailto:WMRSS@wmra.gov.uk)**

## Housing and Employment

Building on the principles of Urban and Rural Renaissance there are two main regional drivers, housing and employment land, which are set out in this section. The challenge is to balance housing growth with employment growth in order to regenerate the Major Urban Areas while fostering thriving rural communities, reducing the need to travel far, and to achieve sustainable communities and growth. The impact of growth on the environment and communities in the Region has also to be considered, in addition to the contribution that development will make to climate change.

This is a partial Revision of the WMRSS not a full review, meaning that the Vision, Principles and Objectives of the WMRSS will not be changed. The aims of achieving Urban and Rural Renaissance by stemming the outward flow of people from the Major Urban Areas, continue to underpin this Revision. However, these Spatial Options do include some key differences in the balance of development across the Region all of which will need considerable commitment to make them happen.

## Housing

**Objectives:** To re-examine regional and sub-regional housing needs and requirements and how these can be best met in the Region up to 2026. To examine local housing market areas as required by Draft PPS3.

The Preferred Option will set out housing figures for each Local Planning Authority up to 2026. Following the Barker Review and the Government household projections (April 2006), see context, it is clear that the Government will expect the Region to build more houses than set out in the current WMRSS.

This change in numbers and approach will in turn change how the cities, towns and rural areas in the Region will grow. However, numbers alone should not be allowed to drive the Revision, it is important that the right type of houses are built in the right places, where people need them, whilst respecting the character of the community and environment where they are built.

The impact on communities, the environment and climate change will depend on the **distribution** of new houses, or in other words, where they are built. This is determined by the

space available now and which will become available in the future and whether the land is suitable to be built on, the **urban capacity**; the number of houses being built on each plot, **density**; and how many, in total, the RPB agrees can be put in the Region, **scale**. The Region also has to consider the type of housing built and how to meet the needs of households who cannot afford to buy in the open market.

The housing numbers run from 2001 to 2026, starting at 2001 as this is a partial Revision of the WMRSS, the Preferred Option will replace or change existing policies. The end date of 2026 allows Local Planning Authorities to use the policies and numbers to provide a 15 year supply of housing land through their local Development Plan Documents, in line with draft PPS3.

The numbers in the Spatial Options refer to dwellings; this is not the same as population as the number of people living in each house, **household size**, may vary. This is important when thinking about the links to employment, centres and transport, as it is population change that underpins the demand for jobs and services, not necessarily increases in the number of dwellings which could house increased numbers of single retired people.

## Housing Demand

The Government 2003-based household projections provide an assessment of the likely growth in the number of households in the period up to 2026, given recent demographic trends and social and economic factors. As such, they are an indicator of future housing demand. In total, the 2003-based projections imply a growth of 447,000 households in the Region between 2001 and 2026, given a continuation of past trends. A large proportion of this growth is projected to be in one person households.

In order to estimate the gross level of new houses required, in addition to household change, an allowance has also been made for households needing to be rehoused from demolished stock and for an ongoing 3% vacancy rate in the new stock. In total, this gives an overall estimate of demand of 575,000 new dwellings required between 2001 and 2026. (See Appendix One).

Using a gross dwelling calculation allows a comparison to be made with the proposals in the current WMRSS. Government guidance however is for the WMRSS to contain proposals for net dwellings (i.e. new completions minus demolitions). When the Preferred Option is prepared, estimates of both gross and net requirements at a local planning authority level will be provided.

Estimates of housing demand for local planning authority areas are set out in Appendix One. These are national projections assuming a continuation of historic local migration trends. They form the starting point for developing the housing Spatial Options.

## Local Housing Market Areas

Draft Government guidance (PPS3) states that in arriving at the proposed distribution of housing provision, RPBs should plan to distribute housing provision so that housing need and demand are met within the sub-regional housing market area, in which they are generated, unless there is very clear evidence that this is not possible. Evidence needs to relate to the availability of land; the environmental, social and economic implications of development; and infrastructure issues. Consultants were commissioned to carry out a study of Local Housing Market Areas looking at demand, across the Region to support the development of Spatial Options, see [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)



## Housing Growth (Overall Numbers)

**Objective:** To re-examine regional and sub-regional housing needs and requirements and how these can be best met in the Region up to 2026.

Before detailed Spatial Options can be considered, the overall totals for the Region have to be established. The table below sets out three levels of housing growth (gross and net) for the Region, 2001 – 2026. For comparative purposes, the recent annual rate of housebuilding is also shown in the table. Option One is based on a continuation of current WMRSS policies; Option Two has been derived from advice and further discussion with Strategic Authorities; and Option Three meets the overall levels of housing demand associated with the Government's latest household projections and the need to replace obsolete stock which will be demolished (see **new housing development** above).

Options	Level of New Housing Development Required 2001-2026		Dwellings per annum		Actual Annual Build Rate 2001 - 2005
	Gross	Net	Gross	Net	
<b>One</b>	381,000	293,400	15,200	11,700	17,400
<b>Two</b>	500,000	385,500	20,000	15,400	17,400
<b>Three</b>	575,000	460,500	23,000	18,400	17,400

Option One carries forward the assumptions made about demolition rates in the WMRSS. Options Two and Three use higher assumptions that are taken from the 2004 Urban Capacity study of 111,000 demolitions 2001-2026. This higher assumption may get changed in light of new evidence before the Preferred Option.

These Options are reference points against which comments can be made. The Preferred Option may not be one of the three, instead your comments will be used along with a robust evidence base to decide on the best level of household growth for the Region. This approach has been taken following the publication of the Government household projection figures in April 2006 and subsequent Government advice.

### What to think about:

There are many issues that have to be thought about when deciding what might be the most appropriate level, and distribution of housing development for the Region:

### Local Development Frameworks

The WMRSS will set out the scale of new dwellings required in each Local Planning Authority area, the actual sites will not be put forward this will be done through the LDFs. Therefore, in terms of impact on biodiversity, designated sites etc it is difficult for the WMRSS to assess the direct impact of the Spatial Options. The RPB will work with the statutory environmental agencies in developing the Preferred Option. The Preferred Option will propose policies that build on the existing WMRSS and therefore the principles of sustainable development will be carried forward.

**Household projections:** The housing Options are based on the use of the Government 2003-based household projections as the indicator of demand. This is one approach, however there may be alternatives. See technical supporting paper Housing Demand.

**Employment growth:** Household growth has to be balanced with employment growth across the Region and at sub regional and local levels. Employment Growth is an issue being explored through the West Midlands Regional Economic Strategy review.

**Climate change:** The amount of dwellings affects the amount of domestic energy use, therefore a significant growth in housing across the Region will have an impact on the amount of CO2 emitted. In addition building houses produces CO2 called “embodied energy” through the construction process, transfer of materials to site and materials used.

**Physical Infrastructure constraints:** The capacity of existing infrastructure, such as water resources, waste water distribution networks and treatment plants, and transport networks may impose constraints on the amount of housing growth in the Region. The RPB will continue to work with all Local Planning Authorities to find out the implications for transport and other infrastructure, this cooperation will shape the Preferred Option. The WMRSS is not site specific and it will be the LDFs that are able to do direct assessments of the impacts and implications of the proposals.

The Sustainability Appraisal (SA) to date has picked up that Severn Trent has water resource limits particularly in southern and eastern Warwickshire, Worcestershire and Shropshire. The SA examined the Environment Agency data which indicated that much of the Region has no additional surface water available and in some areas groundwater abstraction is unsustainable.

The SA has also highlighted the amount of aggregates needed, for housebuilding alone assuming 52.5 tonnes per dwelling; Option One would need 20 million tonnes (801,000 tonnes/per year), Option Two 26.25 million tonnes (1.05 million tonnes/year) and Option Three 30.2 million tonnes (1.2 million tonnes/per year).

The Preferred Option will take into account the advice of the Highways Agency, DfT Rail and the highways Authorities.

**Environmental implications:** Many environmental assets, such as features of historic value and natural habitats that are of regional importance cannot be replaced and their protection has high priority as already reflected in the WMRSS. Some reduction of less sensitive assets may be justified providing appropriate measures are taken to mitigate and/or compensate for any loss. Growth should avoid exceeding any thresholds beyond which irreversible decline in environmental assets is triggered.

Housing development with careful design and site choice, with appropriate green infrastructure could enhance biodiversity.

Waste is discussed in a later section of the Spatial Options. It is important to pick up the links between the housing Options and the amount of additional municipal waste and commercial and industrial waste.

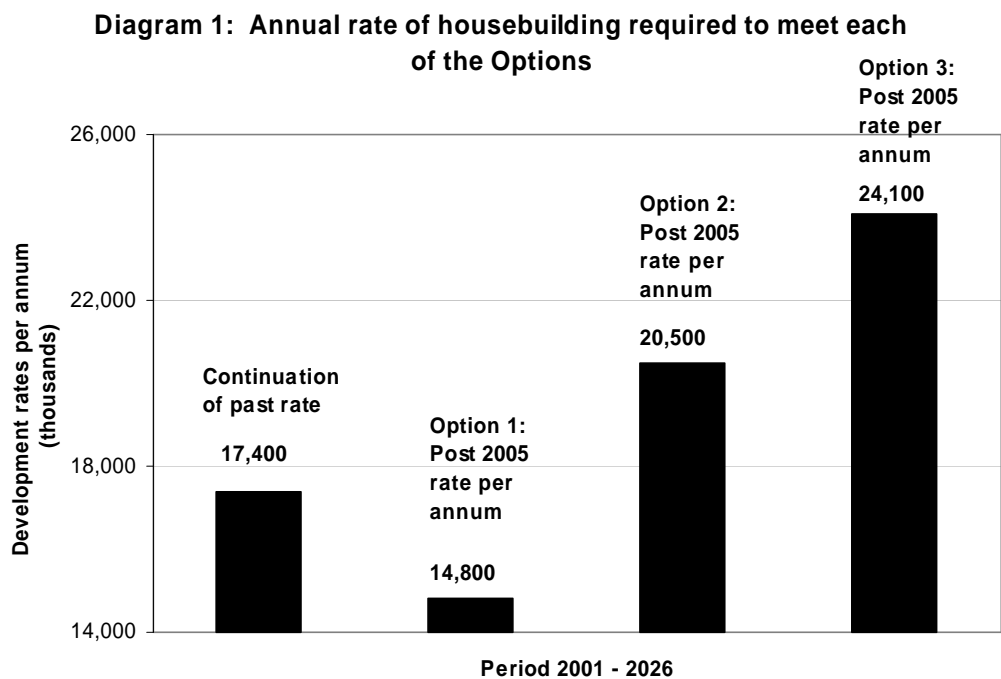
**Communities:** Areas of large scale new housing development will need a range of new and improved social, health and community facilities to help create sustainable communities, for example health centres or green spaces. However, the amount of provision, which will mainly

have to come from Section 106 agreements or the Planning Gain Supplement, will be dependent on the population increase associated with new housing development.

Higher levels of housebuilding should enable more people to access the types of housing they need and may improve the overall affordability of housing across the Region, in both urban and rural areas. It will also accommodate the needs of economic migrants requiring work in the Region, see affordable housing and mix section.

Considerable increase in the size of towns will have an impact on both access to existing health services and the need for more health services. This will also depend on the age of the population as older people will have different health needs to young people. For example; between 2003 and 2028 the number of people aged 50+ is expected to increase from 1.1 million to 1.6 in the Region. There is a national policy of maintaining the independence of older people in their own homes.

**Capacity to build:** The current level of new housing development between 2001 and 2005 has averaged 17,400 dwellings per annum. Past building rates must be thought about when looking at the feasibility of increasing rates of build. To develop at the levels implied by Option Two and Three there would need to be a very large increase in the level of housebuilding each year, this level of growth would require significant investment in new infrastructure. Things to think about include: What is the capacity of the construction industry to build at proposed levels? To what extent will the “best” sites be built on first and how will this impact on the Urban Renaissance of the Region? Do people in the Region have the right skills?



**House prices:** The Government feels that if the estimated level of housing demand is not met then there could be a continued rise in house prices and increased problems of affordability.

**Ratios:** The WMRSS seeks to achieve a ratio of housing provision between the MUAs and other areas of 1:1 by 2011 and 1:0.7 by 2021 i.e. for every ten new houses built in the conurbations, 7 new houses would be built elsewhere in the Region. The Options One, Two, Three alter these

ratios and at higher levels of development the balance between the MUAs and other areas changes, see the questions below;

Options	Level of Demand 2001-2006 (gross).	Yes (please tick)	No (please tick)	Comment
One	381,000		✓	
Two	500,000	✓		
Three	575,000		✓	

**H1: What overall level of new housing development do you think is appropriate to plan for across the Region?**

Option 2 is consistent with the section 4(4) responses. From a Walsall perspective Option 1 appears unlikely to provide sufficient impetus to regeneration in the context of halting or reversing net out-migration. Option 2 is challenging, but, preliminary analysis indicates, at least in physical terms, is achievable. Option 3 would be likely lead to some more difficult choices and is probably a step too far.

**H2: Can you suggest another level?** There needs to be robust evidence to support it.

No

Level	Evidence base

**H3: For each of the Options do you think that the balance of development between the MUAs and other areas is acceptable?** Please see the following section for a more detailed breakdown of the numbers to Local Authority level.

Options	Ratio of development in MUA	Comment
One	53% MUAs 47% other areas	
Two	51% MUAs 49% other areas	
Three	50% MUAs 50% other areas	

The proportions should reflect the maximum realisable capacity of the MUAs – ie the important, indeed over-riding principle is that under any option chosen the MUAs should be filled up first, with the sub-regional foci taking any excess (subject of course to the need to provide adequate employment land to provide a balanced set of opportunities in step with the housing). If the aim remains to halt or reverse net out-migration from MUAs it appears essential that the balance should be in favour of the MUAs for all options, even if this means constraining demand in economic hotspots. Otherwise it seems likely that the drift away from the MUAs will persist.

**H4: Do you think that the capacity of the construction industry, including housebuilding, will be sufficient to meet the levels of housebuilding set out in the housing Options?**

Options	Level of Household Growth Required 2001-2006		Yes (please tick)	Comment
	gross	p.a.		
One	381,000	15,200	✓	
Two	500,000	20,000	✓	
Three	575,000	23,000	✓	

The question is not whether the home builders can respond to these numbers; it is whether economic conditions produce these levels of demand for housing, given that it is economic opportunities that stimulate housing development. The home builders will respond to the market at whatever level suits their business strategies, and in turn households will respond to the level of housing provision. Household size for example could rise as a result of scarcity of provision, and buyers might hold back until the price has fallen back to what they can afford, reducing the demand for new housing. It is important for the Region to understand these feedbacks and how they have a dynamic effect on housing provision. It is not enough simply to see housing provision as simply complying with a rigid set of numbers.

Any new house building will put pressure on environmental resources in the Region and have the potential to increase carbon dioxide emissions. However an element of new housebuilding is essential to meet the ongoing housing demands of the population.

**H5: What measures could be included in RSS policy added to minimise these impacts?**

- Ambitious home building requirements for MUAs, backed by planned interventions from relevant agencies (e.g. EP, AWM) to deliver realistic development opportunities residential, industrial, logistics, office, retail and other developments.
- Maximum requirements for home building in rural areas to reflect purely internal needs.
- Continued acceptance that the Green Belt, especially in or close to the MUAs, should continue to be protected.

**Where housing could go (Distribution)**

Table One, see page aaaa, shows where new dwellings could be built for all Local Planning Authorities in the Region, for each of the Option levels. These three detailed Spatial Options are reference points to help seek views to help development the Preferred Option. Many different ways of distributing the households could have been developed and the Preferred Option could well be very different, following this consultation. The Preferred Option will be subject to further consultation led by the Government Office for the West Midlands.

The WMRSS seeks to encourage development in the MUAs. Beyond the MUAs, longer term strategic housing development is proposed for the foci settlements of Worcester, Telford, Shrewsbury, Hereford and Rugby. The Government has asked that further consideration is given to the role of Burton upon Trent. See WMRSS Policy CF1 and CF2.

See earlier **What to Think About**.

**Option One** (381,000 new dwellings gross, 293,400 dwellings net)

This Option has been based, at the Strategic Authority level, on a continuation of current WMRSS proposals to 2026. For other Local Planning Authorities (Shire Districts), the split is, as far as possible, based on the principles of the existing WMRSS supporting Urban and Rural renaissance and taking into account existing commitments and identified urban capacity, see the Housing Land and Urban Capacity Study 2004 on [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121) Additional requirements which cannot be met by identified urban capacity have been allocated to the 'foci' settlements (including Burton upon Trent) to accommodate longer term greenfield developments.

**Option Two** (491,200 new dwellings gross, *tbc* dwellings net)

This Option is derived from the responses of the Strategic Authorities to the Section 4(4) Brief – both the initial advice and from subsequent discussions between the WMRA and each Section 4(4) Authorities. As such, the distribution is based on local knowledge of opportunities and constraints as well as seeking to meet an appropriate distribution of housing proposals across the Region. Within the Section 4(4) responses, different authorities adopted slightly different approaches to the distribution of provision between Local Planning Authority areas. All responses have taken account of the potential role of 'foci' settlements, as identified in WMRSS Policy CF2 but for different levels of development.

Following the Briefs, more discussions with the Strategic Authorities helped to explore their advice further, these discussions resulted in the distribution of household figures in Options Two. These figures have not received in some cases Member approval at the Strategic Authority, or sub regional Partnership level.

Option Two proposes a wider spread of development than Option One, proposing growth in other settlements as well as the named foci settlements and Burton upon Trent. When combined with phasing policies, it is considered that this approach could continue to support the principles of Urban and Rural Renaissance. Development will continue to be focused in the MUAs, foci and Burton upon Trent and other settlements. The balance between the MUAs and other parts of the Region can be seen in Table One.

The Section 4(4) advice can be found [www.wmra.gov.uk/page.asp?id=208](http://www.wmra.gov.uk/page.asp?id=208)

**Option Three** (575,000 new dwellings gross, 460,500 dwellings net)

This is 75,000 dwellings higher than Option Two. It is the level required to meet the high levels of demand set out in the Government's 2003-based household projections. This Option builds on the distribution shown in Option Two. The additional 75,000 dwellings have been distributed to those parts of the Region which, from the 2003-based household projections, are shown to have a relatively higher level of housing demand in comparison to information contained in Options Two. The approach is in line with draft PPS3: Housing.

Table One shows Potential Distribution of New Dwellings 2001 – 2026 gross figures and Table Two shows Potential Distribution of New Dwellings – Annual Build Rates (gross) 2001 – 2026. In both tables the figures are shown at Local Authority level, this is following the advice of GOWM and draft PPS3.

**Table One:** In some instances the potential growth shown in the Options may be higher than can be physically accommodated in a particular local authority area. These instances are footnoted in Tables One and Two. Development in these cases may involve peripheral expansion of settlements into adjoining local authority areas.

**Table Two** shows build rates for each Local Planning Authority, these are annual rates but in reality there will be some variation between years, especially if a housing scheme is dependant on new or improved infrastructure.

MUAs are defined by the Spatial Strategy diagram in the WMRSS, however, for statistical reasons, housing figures for the overall districts have been included in the tables below.

**Table One: Potential Distribution of New Dwellings 2001 – 2026 gross figures**

	Number of Households 2001 <sup>1</sup>	Option One Dwellings 2001-2026	Option Two Dwellings 2001-2026	Option Three Dwellings 2001-2026
Birmingham	390,792	70,800	83,600	92,000
Coventry	122,353	19,000	24,400	44,000
<b>Black Country</b>	<b>438,869</b>	<b>99,400</b>	<b>99,900</b>	<b>106,700</b>
Solihull	80,930	11,000	15,000	18,000
<b>Metropolitan Area Total</b>	<b>1,032,944</b>	<b>180,200</b>	<b>222,900</b>	<b>260,700</b>
<b>Shropshire</b>	<b>117,301</b>	<b>24,800</b>	<b>29,100</b>	<b>29,100</b>
Bridgnorth	20,925	4,300	3,200	3,200
North Shropshire	23,149	3,900	7,000	7,000
Oswestry	15,656	2,900	4,200	4,200
Shrewsbury and Atcham	40,308	10,800	9,700	9,700
South Shropshire	17,262	2,900	5,000	5,000
<b>Telford and Wrekin</b>	<b>63,738</b>	<b>24,000</b>	<b>30,000</b>	<b>36,000</b>
<b>Staffordshire</b>	<b>328,234</b>	<b>51,300</b>	<b>67,900</b>	<b>77,900</b>
Cannock Chase	37,104	6,000	7,000	7,000
East Staffordshire	42,717	7,700	<sup>2</sup> 15,000	<sup>2</sup> 15,000
Lichfield	37,501	6,500	11,000	16,000
Newcastle-under-Lyme	50,738	7,200	7,500	7,500
South Staffordshire	41,971	5,000	5,000	5,000
Stafford	50,025	9,500	12,900	12,900
Staffordshire Moorlands	38,796	5,500	5,500	5,500
Tamworth	29,382	3,900	4,000	<sup>2</sup> 9,000
<b>Stoke-on-Trent</b>	<b>103,196</b>	<b>15,000</b>	<b>21,000</b>	<b>21,000</b>
<b>Warwickshire</b>	<b>210,900</b>	<b>39,000</b>	<b>52,500</b>	<b>67,500</b>
North Warwickshire	25,176	3,100	3,900	3,900
Nuneaton	48,683	10,000	13,100	15,600
Rugby	36,483	7,100	13,100	<sup>2</sup> 23,100
Stratford-upon-Avon	47,202	7,200	9,300	9,300
Warwick	53,356	11,600	13,100	15,600
<b>Worcestershire</b>	<b>223,048</b>	<b>31,100</b>	<b>47,300</b>	<b>62,300</b>
Bromsgrove	35,167	3,800	4,700	7,200
Malvern Hills	30,070	3,600	6,300	6,300
Redditch	31,652	4,300	<sup>2</sup> 8,200	<sup>2</sup> 13,200
Worcester	39,060	7,200	<sup>2</sup> 11,800	<sup>2</sup> 16,800
Wychavon	46,819	7,600	11,600	14,100
Wyre Forest	40,280	4,600	4,700	4,700
<b>Herefordshire</b>	<b>74,282</b>	<b>16,000</b>	<b>20,500</b>	<b>20,500</b>
<b>Shire and Unitary Authorities</b>	<b>1,120,699</b>	<b>201,200</b>	<b>268,300</b>	<b>314,300</b>
Major Urban Areas <sup>6</sup>	1,186,878	202,400 (53%) <sup>7</sup>	251,400 (51%) <sup>7</sup>	289,200 (50%) <sup>7</sup>
Other Areas	966,765	179,000 (47%) <sup>7</sup>	239,800 (49%) <sup>7</sup>	285,800 (50%) <sup>7</sup>
<b>WESTMIDLANDS REGION</b>	<b>2,153,672</b>	<b>381,000</b>	<b>491,200</b>	<b>575,000</b>

Notes:

<sup>1</sup> Taken from Table KS20 "Household Composition" from the 2001 Census.

<sup>2</sup> To accommodate housing growth may imply development in neighbouring districts.

<sup>3</sup> Detailed distribution of this provision would be determined through a Black Country Joint Core Strategy. Indicative figures at present are:

Dudley:	21,000	Sandwell:	23,600
<b>Walsall:</b>	<b>17,400</b>	Wolverhampton:	17,400

<sup>4</sup> Detailed distribution of this provision would be determined through a Black Country Joint Core Strategy. Indicative figures at present are:

Dudley:	23,800	Sandwell:	34,900
<b>Walsall:</b>	<b>21,000</b>	Wolverhampton:	20,200

<sup>5</sup> Detailed distribution of this provision would be determined through a Black Country Joint Core Strategy. Indicative figures at present are:

Dudley:	25,400	Sandwell:	36,400
<b>Walsall:</b>	<b>22,400</b>	Wolverhampton:	22,500

<sup>6</sup> MUAs include Metropolitan districts plus Stoke-on-Trent and Newcastle under Lyme.

<sup>7</sup> The totals for the Major Urban Areas and the Other Areas are shown as a percentage of the total for the West Midlands region.

**Table Two: Potential Distribution of New Dwellings – Annual Build Rates (gross) 2001-2026**

	Annual Build Rate <sup>1</sup> 2001-2005	Option One Dwellings 2001-2026	Option Two Dwellings 2001-2026	Option Three Dwellings 2001-2026
Birmingham	3,016	2,832	3,344	3,680
Coventry	716	760	976	1,760
<b>Black Country</b>	<b>2,452</b>	<b>3,176</b>	<b>43,996</b>	<b>54,268</b>
Solihull	537	440	600	720
<b>Metropolitan Area Total</b>	<b>6,721</b>	<b>7,208</b>	<b>8,916</b>	<b>10,428</b>
<b>Shropshire</b>	<b>1,148</b>	<b>992</b>	<b>1,164</b>	<b>1,164</b>
Eridgnorth	148	172	128	128
North Shropshire	272	156	280	280
Oswestry	221	116	168	168
Shrewsbury and Atcham	250	432	388	388
South Shropshire	256	116	200	200
<b>Telford and Wrekin</b>	<b>694</b>	<b>960</b>	<b>1,200</b>	<b>1,440</b>
<b>Staffordshire</b>	<b>2,813</b>	<b>2,052</b>	<b>2,716</b>	<b>3,116</b>
Cannock Chase	427	240	280	280
East Staffordshire	266	308	2600	2600
Lichfield	580	260	440	640
Newcastle-under-Lyme	207	288	300	300
South Staffordshire	248	200	200	200
Stafford	615	380	516	516
Staffordshire Moorlands	246	220	220	220
Tamworth	224	156	160	2360
<b>Stoke-on-Trent</b>	<b>721</b>	<b>600</b>	<b>840</b>	<b>840</b>
<b>Warwickshire</b>	<b>2,586</b>	<b>1,560</b>	<b>2,100</b>	<b>2,700</b>
North Warwickshire	132	124	156	156
Nuneaton	572	400	524	624
Rugby	403	284	524	2924
Stratford-on-Avon	640	288	372	372
Warwick	840	464	524	624
<b>Worcestershire</b>	<b>2,101</b>	<b>1,244</b>	<b>1,892</b>	<b>2,492</b>
Bromsgrove	521	152	188	288
Malvern Hills	240	144	252	252
Redditch	306	172	2328	2528
Worcester	209	288	2472	2672
Wychavon	453	304	464	564
Wyre Forest	372	184	188	188
<b>Herefordshire</b>	<b>588</b>	<b>640</b>	<b>820</b>	<b>820</b>
<b>Shire and Unitary Authorities</b>	<b>10,649</b>	<b>8,048</b>	<b>10,732</b>	<b>12,572</b>
Major Urban Areas <sup>6</sup>	7,648	8,096	10,056	11,568
Other Areas	9,722	7,160	9,592	11,432
<b>WEST MIDLANDS REGION</b>	<b>17,369</b>	<b>15,256</b>	<b>19,648</b>	<b>23,000</b>

**Notes:**

1 Taken from the West Midlands Regional Spatial Strategy Annual Monitoring Reports 2001-2005.

2 To accommodate housing growth based at this centre may imply development in neighbouring districts.

3 Detailed distribution of this provision would be determined through a Black Country Joint Core Strategy.

Indicative figures at present are: **Dudley: 840** **Sandwell: 944**  
**Walsall: 696** **Wolverhampton: 696**

4 Detailed distribution of this provision would be determined through a Black Country Joint Core Strategy.

Indicative figures at present are: **Dudley: 952** **Sandwell: 1,396**  
**Walsall: 840** **Wolverhampton: 808**

5 Detailed distribution of this provision would be determined through a Black Country Joint Core Strategy.

Indicative figures at present are: **Dudley: 1,016** **Sandwell: 1,456**  
**Walsall: 896** **Wolverhampton: 900**

6 MUAs include Metropolitan districts plus Stoke-on-Trent and Newcastle under Lyme.

Totals may not add due to rounding.

The principle of Urban Renaissance and the sequential approach set out in draft PPS3, of developing previously developed (brownfield) land first ahead of greenfield land, is central to the Spatial Options. However, all of the Options will involve development on greenfield land. The



higher the level of development, the more greenfield land is likely to be needed to meet the proposed level of development.

Initial estimates suggest that, with the proposed distribution set out in Table One, Option Two could require the development of around a further 48,000 dwellings on greenfield sites over and above existing commitments and draft Local Development Framework proposals (as at 2004); while Option Three would require the development of a further 123,000 dwellings on greenfield housing sites.

Further work will be undertaken as part of the development of the Preferred Option, to assess the target for development on brownfield land in different parts of the Region. In addition to this, phasing policies will be developed in the Preferred Option to make sure that the principles of Urban and Rural Renaissance are implemented, through development in the MUAs being the primary focus.

Options Two and Three will mean a greater spread of development across both the urban and rural areas including some expansion of market towns. Options Two and Three also imply a higher level of development at the foci settlements and at Burton upon Trent.

Option Two, and to a greater extent Option Three, could also involve the release of Green Belt land for housing development. This could involve peripheral development around the MUAs and other urban areas.

In the future, most new developments will be built at densities higher than have occurred in the past. Draft Government guidance indicates that there should be a presumption that no new development should be built at a net density of less than 30 dwellings per hectare and recommends a range of densities, depending on the nature of the area, from 30 – 40 dwellings per hectare in rural areas to over 70 dwellings per hectare in City Centres. This will imply a greater concentration on terraced properties and flats. This could help to ease affordability problems but could limit the extent to which new housing development could meet the full range of identified needs.

### **What to think about**

When thinking about the distribution of housing, in addition to the issues raised under the overall growth on page 15, you need to think about;

- What is the relationship and balance between new housing in different parts of the Region, particularly the Major Urban Areas, and the provision of high quality employment land?
- At what point will building houses at high densities lead to problems in meeting the full range of housing needs?
- At what point will new housing development outside the MUAs increase the risk of undermining Urban Renaissance, leading to unsustainable out-migration, particularly of younger and more affluent households?
- At what point will new housing lead to unacceptable loss/damage to environmental assets or breach thresholds resulting in the irreversible decline in environmental assets?
- At what point will the lack of new housing lead to unsustainable pressures on the existing housing stock e.g. overcrowding, homelessness, or excessive rises in house prices.
- How will the distribution of housing affect rural communities and affordability?

## **What this means for different parts of the Region**

In developing the Preferred Option, reference will be made to housing demand within local housing market areas as required by draft PPS3. Where provision cannot be made within the same local housing market areas in which demand arises provision will be made in other areas taking account of the underlying principles of Urban and Rural Renaissance.

The WMRA has commissioned a study which has identified 38 local housing market areas across the Region, see [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

In the following section, local authorities and local housing market areas have been grouped to explain the implications of the Housing Options. These groupings do not imply a definite policy direction. The Preferred Option will explore these issues further.

### **West Midlands conurbation (and surrounding area)**

A particular issue in the Region, is to try to meet the housing demands arising from the West Midlands conurbation, in ways that do not undermine Urban Renaissance. In total, the West Midlands conurbation is home to 2.6 million people with around 1.18 million people living in Birmingham and Solihull; nearly 1.1 million people in the Black Country; and 301,000 in Coventry. Projected housing demand in this part of the Region, particularly from Birmingham (as evidenced in the 2003-based projections) is relatively high, due to the young age structure and ethnic diversity of the population, see Appendix One. The 2003-based projections are based on assumptions of a continuation of recent past trends.

The vision in both the Birmingham Coventry and Black Country City Region Growth and Prosperity Strategy and the Black Country Study of a growing population in the conurbation will require high levels of new housing development, particularly as occupancy rates continue to decline. Successful regeneration will require the extensive restructuring of land uses, including the use of employment land for housing. New development is also likely to be at high densities. Infrastructure and reclamation costs will be very high. However, if provision is made to meet demand within surrounding areas, this could increase the level of out migration and potentially undermine successful regeneration.

The conurbation is surrounded by Green Belt. The settlements within and immediately beyond the Green Belt are generally small – medium sized towns which have grown significantly over the last 60 years through provision for out-migrants from the West Midlands conurbation. The one exception is the larger settlement of Telford (pop. 158,000) which was developed as a New Town from the 1960s onwards, to meet the overspill needs of Birmingham and the Black Country. Current WMRSS Policy is to limit development in these settlements to promote renaissance of the MUAs. The levels and distribution of development in Options Two and Three challenge this approach.

Birmingham and Solihull, in particular have a wide area of influence across the Region, including areas in South East Staffordshire and North Worcestershire. Housing demand is high in this part of the Region and because of its scale, see Appendix One, it is unlikely that housing demand arising in Birmingham can be met within its administrative boundaries.

The Black Country also has a wide area of influence covering parts of Staffordshire, Telford, Shropshire and Worcestershire. The draft Phase One Revision: Black Country has identified opportunities for Urban Renaissance and new housing developments, consistent with the current WMRSS proposals and time period to 2021. However, in coming forward with these proposals,

the overarching Black Country Study has also examined a wider, longer term policy framework to 2031 with associated technical evidence also looking forward over 30 years to 2031. It has therefore been able to test the robustness of the strategic policies being put forward to 2021 by taking account of this longer term potential for growth and change - most notably in assessing housing and employment land capacity.

From this analysis, it is apparent that the strategy proposed in the draft Phase One Revision for Black Country could potentially be capable of absorbing faster housing growth to 2021 and 2026. However, in assessing the feasibility and desirability of this approach, there are a range of factors that need to be considered including whether appropriate delivery processes and mechanisms could be put in place to accelerate development.

Against this background, whilst Options Two and Three of Phase Two now identify levels of housing provision for the Black Country above the minimum identified in Phase One, consultation on these Options will need to take the above considerations into account.

Telford is part of the emerging City Region with close links to the Black Country. The town is still benefiting from its background as a New Town. The Section 4(4) return from Telford and Wrekin has identified that the town has significant capacity for further development without extensive investment in infrastructure. Its position astride the M54 and with rail links to the conurbation (including Birmingham) means that it is well placed to meet housing demands arising in the West Midlands conurbation, particularly the Black Country.

Coventry's area of influence covers Warwickshire. Parts of the city suffer from low housing demand. Significant opportunities exist for land use restructuring and regeneration within Coventry. The city should be able to meet its housing demand. Development at the levels set out in Options Two and Three could involve the release of peripheral Green Belt land.

### **North Staffordshire Conurbation (and surrounding areas)**

The North Staffordshire Conurbation is generally a weak housing demand area. The RENEW pathfinder has been set up to tackle issues of low demand. The area potentially has an ample supply of brownfield land to meet projected demand in the period up to 2026 – all be it, land which generally requires major investment to render it suitable for new housing and employment development.

Further housing development in surrounding areas both in Staffordshire and Cheshire could undermine Urban Renaissance unless it is carefully phased and designed to meet local needs.

### **Other Parts of the Region**

In the east of the Region, Burton upon Trent has very close links with neighbouring areas in South Derbyshire and North West Leicestershire.

The current WMRSS does not identify Burton upon Trent as a foci settlement, although the Secretary of State requested that the issue should be considered as part of the Phase Two Revision. It is a town of a scale that can accommodate significant level of new development and is closely linked to neighbouring urban areas in South Derbyshire in the East Midlands. It also has links, through rail and road communications with Lichfield and Tamworth and the Birmingham. Development at levels in Options Two and Three, are consistent with Burton upon Trent as a focus for significant new development on both brownfield and greenfield land.

In the south east of the Region, Warwickshire has very close links with Coventry and parts of Worcestershire. Some parts in the north of the County, for example Nuneaton and Bedworth, have relatively low housing demand but areas in the south of the County together with southern Worcestershire are high demand areas containing attractive towns and villages which attract migrant households both from within and outside the Region.

While Rugby has links with Coventry its future role is more likely to be in connection with its 'gateway' position located between the affluent areas of the Region and the Milton Keynes South Midlands growth area, where significant proposals for development are contained within the RSSs for the East Midlands and South East.

Worcester is identified as a foci settlement for significant development, see Policy CF2. Development at Worcester would extend beyond the limits of the City's current administrative boundaries.

Options Two and Three also propose new development in other towns across the area.

In the west of the Region, settlements are smaller. Hereford and Shrewsbury are the main administrative and service centres for a very wide rural area, extending into Wales.

The area is generally attractive to migrant households from outside the Region, but has suffered economically as traditional rural industries and services have declined. However, Options Two and Three also propose a spread of housing developments throughout the smaller market towns of the area, which will aid Rural Renaissance.

**H6:** Table One and Table Two show regional housing development across all local authorities in the Region. **What do you think about the overall balance of proposals under each of the Options?**

It is for the Region itself, not any one district, to assess the implications of the pattern or balance across the region and invite comment on these.

**H7:** You may wish to consider specific parts of the Region, please set out below any comments you wish to make on any part of the Region. Please specify the area in which you are commenting.

The figures indicated for Walsall would represent increases of 16%, 40% and 49% above the current average of 600 new homes per year. Although it would be a very significant increase, it appears from the Black Country Study and the UHCS Refresh that Option Two could be accommodated on previously-developed land, given appropriate mechanism to deliver modern industrial, logistics and office development and transfer of surplus employment and other previously-developed land to residential use. However, this could make it difficult to retain, enhance and increase areas of low density, higher quality residential areas to cater to the aspirations of more affluent households.

This appears to be the case for the four Black Country boroughs collectively.

**H8:** In particular, do you think that Burton on Trent should be a foci settlement, accommodating significant development on greenfield land?

Walsall Council has no comment to make on this issue.

**H9: Do you think that the currently identified foci settlements of Worcester, Telford, Shrewsbury, Hereford and Rugby should fulfil this role, accommodating significant development on greenfield land?**

Walsall Council has no comment to make regarding Worcester, Shrewsbury, Hereford and Rugby.

However, under Options Two and Three, the proposed scale of home building, at approximately 30% of the Black Country figure, could, especially in a period of relative economic success, attract disproportionate amounts of development. This could require a response from the Black Country to bring forward more greenfield or Green Belt sites, which would impact more on Walsall, which has the most Green Belt land of the Black Country boroughs.

On that basis, if Telford is to be one of the sub-regional foci, perhaps there should be a policy to limit the pace of development as well as the overall 25-year total. This could be managed based on monitoring to ensure that early development in Telford does not undermine regeneration in the Black Country and other MUAs.

## **Affordable Housing and Housing Mix**

**Objective:** To examine, within the overall requirement, how additional new affordable housing provision can be made across the Region.

Delivery of a balance of housing types and mixed communities is an important part of the WMRSS, Urban Renaissance and Rural Renaissance. The WMRSS sets a framework for Local Development Documents to define how many affordable houses are needed in their area.

The Regional Housing Strategy (RHS), June 2005, provides estimates of the need for affordable housing in different parts of the Region and provides a framework to aid the delivery of such houses. It estimates that up to 2021, 77,900 (3,900 per year) affordable houses are needed across the Region of which 46,500 (2,300 per year) need to be social housing. The figures are based on the current WMRSS housing numbers. It is expected that further work will be commissioned to update these estimates, through the Regional Housing Board. The RHS can be found at [www.wmra.gov.uk/page.asp?id=63](http://www.wmra.gov.uk/page.asp?id=63)

The WMRSS states, para 6.24, that for the period 2001-11, an estimated 6,000 – 6,500 affordable dwellings are needed each year across the Region. The Annual Monitoring Report shows that this target has not been met, with average annual build rates only being about half this level.

### **What to think about**

The WMRSS sets out strategic planning policies to aid the delivery of affordable housing. Local Development Documents provide the detail at local level to aid local implementation and will contain targets for the provision of affordable housing. However, planning policies, whether regional or local, are only one of several policy mechanisms that are needed to secure the provision of affordable housing. Alone, planning policies are not able to solve all the affordable housing issues.

There are two distinct aspects to the provision of affordable housing:

- a) Improving the general affordability of houses, particularly for first time buyers; and
- b) The provision of housing that has an element of subsidy for those who cannot compete in the open market. Draft PPS3 definition – see [www.communities.gov.uk/embedded\\_object.asp?id=1162097](http://www.communities.gov.uk/embedded_object.asp?id=1162097)

This can be social or shared equity housing.

The Government believe that substantially increasing the level of new house building will improve the general affordability of houses and thereby help first time buyers to purchase property. Options Two and Three substantially increase the level of new housebuilding across the Region. However, obtaining an appropriate housing mix in new developments is key to meeting the needs of first time buyers and other groups in the population.

Housing mix includes type of property e.g. terraced, detached; size of property e.g. number of bedrooms; and tenure e.g. owner occupied or privately rented. The required housing mix will vary in different parts of the Region and will need to be influenced by emerging local and sub-regional housing need assessments. Particularly within the MUAs, the aim will be to create robust 'pathways of choice' so that people can make the necessary housing choices for their changing life styles while staying within their local communities.

The delivery of the social aspect of affordable housing (i.e. housing provided with a subsidy) has been averaging 2,600 dwellings per annum in the Region, between 1986 and 2005. Private sector contributions from Section 106 agreements linked to planning permissions for new housing have also contributed to the delivery of these dwellings. The Government have a standard criterion for determining the minimum size of site (25 dwellings) on which a local authority can negotiate with a private developer to secure a contribution to the provision of affordable housing (Circular 6/98). New draft Government guidance (draft PPS3) is suggesting reducing this threshold to 15 dwellings. Special circumstances have to be proven for regional or local planning policy to set a lower threshold. Initial work suggests that, at least in the short – medium term, the level of provision of social housing with a subsidy is unlikely to be higher than 3,000 dwellings per annum.

The need for social housing varies widely across the Region, depending on the characteristics of the existing housing stock, on current house prices and the mix of new development, and on local incomes. Given the wide range of needs across the Region, consideration needs to be given whether an affordable housing target at a Local Planning Authority level could be specified in the WMRSS.

It is hoped that the Preferred Option will include a regional target for affordable housing possibly supplemented by some guidance on the varying levels of need across the Region. This will enable Local Planning Authorities to determine the detailed policies that are needed at the local level to help develop detailed affordable housing policies, including where thresholds need to be lowered and/or where a higher proportion of affordable housing provision should be negotiated. This has the potential to increase the amount of affordable housing where it is most needed.

The RPB approach to provision of affordable housing in rural areas is consistent with draft PPS3 which states "Local Planning Authorities should make sufficient land available within or adjoining market towns or villages." This will include sites in smaller villages where an 'exceptions' site policy may be appropriate.

**H10: Do you think that the proposed approach where the WMRSS provides a Regional target and where Local Planning Authorities provide local targets through the Local Development Frameworks process is appropriate?**

Yes.

There will be localised variation in needs and in opportunity for provision of affordable housing, in terms of quantity, type and tenure.

**H11: What would the implications be of having a District level affordable housing target (as a minima) in the WMRSS?**

It would mean that Housing DPDs would need to identify sites where the required minimum amount of affordable housing would be provided. This would require detailed appraisal of sites up to 5 or even 10 years before development occurs or planning permission is granted, during which time the viability of development including assumptions about affordable housing could change considerably. Site-based figures would therefore be unreliable and could only be indicative. It could also be the case that, for other market reasons, the developments that were "allocated" for (say) intermediate housing would come forward first leading to an oversupply of intermediate and a shortage of social rented housing.

In practise, the Housing Needs Study for Walsall, and other authorities, sets out very high requirements for affordable housing. In Walsall need is apparently more than 100% of total development at the current average rate, which is clearly unviable. In that context, the optimum would be to require the maximum that could be achieved from each new development. This would best be done through LDFs, including DPDs and SPDs, which would be more responsive to local variation in delivery.

**H12: Do you have any other ideas on how levels of affordable housing delivery can be better directed by the WMRSS?**

No.

**H13: Evidence from monitoring suggests that no more than 3,000 affordable houses, with subsidy, are likely to be built each year across the Region. Do you have robust evidence to support or contradict this view?**

No.

**H14: Should the WMRSS identify those parts of the Region with a relatively high need for social housing where a lower threshold for negotiating Section 106 agreements with the private sector should be considered in LDDs?**

No.

**H15: Do you have any robust evidence on an appropriate housing mix within new developments that are needed in different parts of the Region?**

No.

## Managing Housing Development

The role of the WMRSS is to manage growth throughout the Region to promote Urban and Rural Renaissance and create and maintain sustainable communities.

The Government response to the Barker Report, see Context, seeks to increase the level of housebuilding by a third across England by 2016. Priority however remains for development of brownfield land in sustainable locations before the development of greenfield land.

While the Preferred Option will maintain the WMRSS priority of significantly increasing housebuilding within the MUAs, post 2011, Options Two and Three will also require rapid implementation of housebuilding elsewhere in the Region at the same time. Options Two and Three imply release of land in the foci and other urban areas earlier than the WMRSS anticipated. This is in line with the Government's New Growth Points initiatives, however it is important that the phasing of such developments is carefully controlled.

Some allocations will be automatically phased, particularly if significant new strategic infrastructure investment is required before development can start. There is a danger however that if planning policy seeks to exercise too tight a control over phasing issues, the overall building rate could fall below what is required to meet demand. Equally, there is a danger that, if control is too loose, the current urban outflow will continue, helped by the provision of greenfield housing developments outside the MUAs.

The WMRSS sets minima targets for the MUAs and maxima targets for other parts of the Region. Given the Government response to the Barker Report the use of maxima targets for new housing development may no longer be appropriate. However, development in excess of the targets in areas outside the MUAs could undermine Urban Renaissance. Minima targets in the MUAs may still be appropriate to deliver the Government's growth agenda.

Work on the Preferred Option will consider phasing requirements and is likely to provide differential targets for new housing provision over suitable time periods, covering all local authority areas. This will provide the framework for the regular monitoring of the WMRSS housing policies.

**H16: Options Two and Three imply release of land in the foci and other urban areas earlier than anticipated in the WMRSS – do you agree with this approach?**

Yes.

**H17: It could be considered that the Government's growth agenda implies that the use of maxima targets for areas outside the MUAs is inappropriate – do you agree with this approach?**

Yes.

Maxima for areas outside MUAs are essential to the regeneration of MUAs such as the Black Country. This approach was supported at the Ph1 Review EIP by South Staffordshire, and all of the shire counties.



## H18: Do you think the use of minima targets for the MUAs is still appropriate?

Yes.

# Employment

**Objectives:** To re-examine regional and sub-regional employment land needs and requirements and to consider the desirability and feasibility of identifying district level figures for the period to 2026. To re-assess existing strategic land designations and identification of broad location for additional provision.

The Region's economy has undergone significant changes over recent years. It is clear that the type of employment land will need to change. We are seeing a loss of manufacturing industry, but a growth in services and office type employment which may need different types of locations. Office development can generate significant levels of employment on relatively small sites. The warehousing and distribution sector has experienced considerable growth which has helped to promote strong demand for industrial land in many parts of the Region. Employment generation from warehousing and development is lower than offices but involves a significantly higher land take. We also have to bear in mind that the economic cycle could lead to increased manufacturing investment even in the context of long-term decline, and we need to provide for this. We also need to ensure that the land supply matches the skills and employment profile of the workforce.

In the future there are likely to be some industrial sites and areas which no longer meet modern industrial requirements where there may be potential for conversion to other uses such as housing. However, using too much existing employment land for housing now could lead to too little land being available for employment.

While thinking about the housing Options we have to also consider the impact of this scale of housing on the availability of employment land. The Preferred Option will make stronger links between employment land provision and the housing distribution.

One example of this balanced approach has been demonstrated by the draft Phase One Revision: The Black Country. In this case, an integrated approach was adopted, assessing economic and job needs, understanding spatial implications and co-ordinating this with assessments of housing needs and capacity. The submission proposes a balance of policies for Urban Renaissance. This includes the provision of new opportunities for housing development through the use of former poor quality employment sites along public transport corridors. Alongside this, locations are identified for the provision of quality, accessible employment land to promote a restructured economy and meet the needs of future households.

This section on employment land is concerned with employment development outside of centres and therefore relates mainly to industrial/warehousing development and office development outside of centres. The growth in offices within centres is examined in the context of Strategic Centres which is discussed in a later section.

The West Midlands Economic Strategy (WMES) is currently being reviewed by Advantage West Midlands, the Policy Options in this Review will have connections to the Spatial Options. The WMES review is considering the best way to achieve future economic prosperity, the challenges that need to be overcome and opportunities grasped. The evidence gathered to support the

WMES Review and these Spatial Options have been shared. For more information about the WMES Review see [www.advantagewm.co.uk/wmesreview.html](http://www.advantagewm.co.uk/wmesreview.html)

## Future Employment Land Requirements

### Method

There isn't one particular recognised method for estimating employment land requirements. The West Midlands Employment Land Advisory Group (WMELAG) considered many methods including a labour demand model, housing growth methodology and an analysis of past trends. The group thought the most effective and reliable method is a five year "reservoir" approach based on an analysis of past trends, although it was recognised that there were advantages and disadvantages. In particular, there is a need to relate past trends to households projections and also the policy aspirations of the WMRSS.

The five year reservoir would consist of readily available land and would act as a rolling reservoir. At any point in time, during the WMRSS period, each district would therefore need to demonstrate that there is a portfolio of readily available employment sites (i.e. sites with no major development constraints) which is the equivalent of the reservoir figure. This reservoir of land would need to be maintained throughout 2001-2026. A Local Planning Authority would also need to maintain a land bank of not readily available sites (i.e. sites with development constraints) which would be brought forward through the plan period to top-up readily available supply.

To fit with the policy aspirations of the WMRSS there is a need to focus employment development within the MUAs, Policy PA1. In order to ensure consistency with this objective it may be necessary for the reservoir figures to be minimum in the MUAs and maximum elsewhere. The reservoir will be subject to regular annual monitoring to assess performance as compared to estimated requirements. An indication of employment land requirements based on this method is included in table xxxx. This analysis excludes completions on Regionally Significant Sites which are addressed through other policies.

Examples of how the reservoir would work:

### How does the minimum reservoir approach work within a MUA authority?

Using for example, a MUA authority with a readily available minimum reservoir requirement of 50 hectares. Using this figure as a base the authority would need to provide a portfolio of land in accordance with RSS policy PA6. The authority would need to identify how much land should be readily available within each category of the portfolio. It could equate to the following:

- Sub-regional employment land – 25 hectares of readily available land at all times.
- Good quality land – 15 hectares of readily available land at all times.
- Other land – 10 hectares of readily available land at all times.

The MUA authority would also need to maintain a supply of not readily available sites across the portfolio of employment land. This would enable sites to be brought forward as readily available supply diminishes. This could include allocating land to meet longer term requirements.

If the authority's currently supply equated to 30 hectares of readily available land and 50 hectares of not readily available land, this would indicate that additional readily available sites would be needed to meet the minimum reservoir requirements. This deficit could be addressed

by bringing forward not readily available sites for development and in the longer term identifying additional sites to boost supply.

As part of the MUA the supply of readily available land could exceed the minimum targets if for example, strong market demand resulted in not readily available sites being brought forward for development at a faster rate than expected. The overall aim of this approach would be to ensure that no desirable employment development is lost due to the lack of a suitable site.

### **How does the minimum reservoir approach work within a Shire authority?**

Within the Shire Authorities it may be desirable to restrict employment land supply to maximum figures to ensure that development is focused within the MUAs. Using for example a Shire authority with a requirement to provide a maximum reservoir of readily available employment land of 25 hectares. Again the authority would need to provide a portfolio of employment land in accordance with policy PA6. This could equate to the following:

- Sub-regional employment sites – 12 hectares of readily available land at all times.
- Good quality – 9 hectares of readily available land at all times.
- Other local – 4 hectares of readily available land at all times.

The Shire authorities existing employment land supply equates to 20 hectares of readily available land and 100 hectares of not readily available land. The Shire authority could therefore decide to accelerate the rate at which not readily available sites are being brought forward to increase readily available supply closer to the 25 hectare maximum figure.

If an over-supply of readily available land occurred at any point in time in the plan period the Shire authority would need to take all reasonable attempts within the authorities control to address this conflict. This could include delaying the release of allocated sites for development until later in the plan period or de-allocating land if the site was no longer seen as necessary to meet the maximum figures. With the case of a maximum authority it may also be necessary to control the rate of completions. As such, the indicative longer-term figures to 2026 would act as a maximum level of completions for that authority.

### **What to think about**

Providing guidance on employment land requirements will help local authorities to prepare LDFs and make sure that future employment land requirements are met. The reliability of long term forecasts needs to be thought about as well, as the need to relate employment land needs to household growth and policy objectives.

The waste Options raise issues around using employment sites for waste disposal, please read that section before answering E8.

**E1: Do you agree that future employment land requirements should be quantified in the WMRSS?** If employment land is not quantified in the WMRSS, individual authorities will calculate their own land requirements, the WMRSS would have general guidance on the type of methodology that could be used.

Yes.

RSS Policy PA1 A states that economic growth should, wherever possible, be focused on the Major Urban Areas in order to reverse previous decline. It follows that the region needs to

ensure that the supply of land in the Major Urban Areas is equal to the task of absorbing what would be extra demand, or growth, whilst restricting land elsewhere to a maximum figure that reflects the urban renaissance policy objective and Guiding Principle E, to support rural development and diversification without facilitating further decentralisation. For this to happen, it is crucial that the RSS sets out a set of land requirements for each authority or, where appropriate (as with the Black Country Boroughs) a figure for the total land requirement for a group of authorities that respects the MUA designation.

**E2: If the amount of employment land requirements is included, should it be broken down to Strategic Authority or district levels?**

Strategic Authority level                      District level

We consider that it would be enough to break the requirement down to strategic authority level.

**E3: Do you agree with the principle of a reservoir of employment land?**

Yes.

The identification of a minimum reservoir of employment land will also be important for ensuring that sufficient land is available to meet the region's future waste management requirements (see also response to Question W1).

**E4: What period of time should the reservoir cover?**

5 years                      7.5 years                      10 years                      suggested years

**E5: Should employment land requirements in the MUAs be identified as maximum or minimum figures?** i.e. should the reservoir figures identified in table XX act as maximum or minimum figures.

Maximum                      Minimum

**E6: Outside of the MUAs should employment land figures be identified as maximum or minimum figures?**

Maximum                      Minimum

## RELS Completions

The Regional Employment Land Study (RELS) is produced annually to provide a description and analysis of the employment land supply position within the Region. RELS monitors all land committed for an industrial/employment use in excess of 0.4 hectares and falling within use classes B1b (research and development), B1c (light industrial), B2 (general industrial) and B8 (warehousing and distribution). The study also monitors B1a office development outside City and Town centres. The following table is based on an analysis of employment land completions monitored by RELS over the last 10 years. Two growth rates have then been applied to the figures. Over the ten-year period (1995-2004) output in the Region grew at an annual average rate of 2.2%. The Regions output growth is forecast to grow at a slightly higher annual average rate of 2.4% during the next 15 years. Indicative longer term demand figures are also illustrated for the period 2001 to 2026. These are indicative figures only but give an indication of the land required for employment use over a 25 year period should past trends be replicated.

**Table: Showing RELS Completions**

	Total hectares developed 1995-2004	1995-2004 Average Completions	Indicative readily available 5 year reservoir figure based on 2.2% historic growth rate of output	Indicative readily available 5 year reservoir figure based on 2.4% forecast growth rate output	Indicative longer term requirements 2001 - 2026	2005 total supply of employment land	Percentage of brownfield completions over 1995-2004 period
Birmingham	235.7	23.6	118	129	590 - 645	225	81.4
Coventry	124.4	12.4	62	68	310 - 340	56	72.5
Dudley	66.5	6.7	34	37	170 - 185	44	74.8
Sandwell	150	15	75	82	375 - 410	128	99.6
Solihull	32.4	3.2	16	18	80 - 90	92	23.3
Walsall	78.1	7.8	39	43	195 - 215	120	90.1
Wolverhampton	72.1	7.2	36	39	180 - 195	74	83.1
<b>Metropolitan Area</b>	<b>759.2</b>	<b>75.9</b>	<b>380</b>	<b>416</b>	<b>1900 - 2080</b>	<b>740</b>	<b>81.5</b>
<b>Herefordshire</b>	<b>43.3</b>	<b>4.3</b>	<b>22</b>	<b>24</b>	<b>110 - 120</b>	<b>175</b>	<b>74.9</b>
<b>Stoke-on-Trent</b>	<b>43.9</b>	<b>4.4</b>	<b>22</b>	<b>24</b>	<b>110 - 120</b>	<b>297</b>	<b>87.6</b>
<b>Telford &amp; Wrekin</b>	<b>72.4</b>	<b>7.2</b>	<b>36</b>	<b>39</b>	<b>180 - 195</b>	<b>207</b>	<b>62.4</b>
Bridgnorth	4.7	0.5	2	3	10.0 - 15.0	18	44.3
N Shropshire	20.2	2	10	11	50 - 55	77	33.3
Oswestry	5.3	0.5	2	3	10.0 - 15.0	30	24
Shrewsbury/Atcham	24.3	2.4	12	13	60 - 65	64	21.2
S Shropshire	7	0.7	3	4	15 - 20	15	24.4
<b>Shropshire</b>	<b>61.5</b>	<b>6.1</b>	<b>29</b>	<b>34</b>	<b>145 - 170</b>	<b>204</b>	<b>27.9</b>
Tamworth	43.3	4.3	22	24	110 - 120	93	17.5
Lichfield	54.6	5.5	28	30	140 - 150	179	82.7
Cannock Chase	33.9	3.4	17	19	85 - 95	99	92.9
South Staffordshire	32.2	3.2	16	18	80 - 90	127	29.5
East Staffordshire	100.7	10.1	51	55	255 - 275	148	8.4
Newcastle	41.4	4.1	21	22	105 - 110	133	75.7
Stafford	55.5	5.6	28	31	140 - 155	119	44.2
Stafford Moorlands	12.2	1.2	6	7	30 - 35	98	48.4
<b>Staffordshire</b>	<b>373.8</b>	<b>37.4</b>	<b>189</b>	<b>206</b>	<b>945 - 1030</b>	<b>996</b>	<b>43.9</b>
N Warwickshire	85.7	8.6	43	47	215 - 235	225	99.5
Nuneaton & Bedworth	83.9	8.4	42	46	210 - 230	46	87.2
Warwick	56.7	5.7	29	31	145 - 155	54	19.4
Rugby	65.5	6.5	33	36	165 - 180	76	8.4
Stratford	73.7	7.4	37	40	185 - 200	63	16.1
<b>Warwickshire</b>	<b>365.5</b>	<b>36.6</b>	<b>184</b>	<b>200</b>	<b>920 - 1000</b>	<b>463</b>	<b>51.1</b>
Redditch	14.6	1.5	7	8	35 - 40	21	36.1
Bromsgrove	36.3	3.6	18	20	90 - 100	40	28.2
Wyre Forest	4.7	0.5	2	3	10.0 - 15.0	45	30.3
Worcester	25.5	2.6	13	14	65 - 70	55	4.6
Wychavon	44	4.4	22	24	110 - 120	72	8.4
Malvern Hills	18.4	1.8	9	10	45 - 50	21	20
<b>Worcestershire</b>	<b>143.5</b>	<b>14.4</b>	<b>71</b>	<b>79</b>	<b>355 - 395</b>	<b>254</b>	<b>17.7</b>
<b>Total</b>	<b>1863.1</b>	<b>186.3</b>	<b>933</b>	<b>1022</b>	<b>4665 - 5110</b>	<b>3,337</b>	<b>60.6</b>

\* Figures for reservoir and indicative longer term requirements rounded

RELS analysis in the table above does not include completions on Regional Logistics Sites, Major Investment Sites or Regional Investment Sites.

Average completions cover 10 year period beginning in April 1994 and ending in March 2004. RELS completions post 2002 include sites greater than an acre in size, while pre 2002 completions relate to sites greater than 1 hectare. Above analysis excludes all completions on regionally significant sites.

**E7: Do you have any comments on this table?** For example, you may wish to consider whether the figures are sufficient to meet the employment land requirements of a particular area or whether there would be any conflict with the policy objectives of the Spatial Strategy.

The problem with these figures is that they simply project forward the trend embodied in previous years – ie only providing for around 40% of industrial development happening in the Metropolitan Area as opposed to the rest of the Region. This will not fulfil the policy objective of policy PA1 A, which is, wherever possible, to focus economic growth on the Major Urban Areas. As we pointed out in our section 4(4) advice, this would simply perpetuate and possibly exacerbate the polarisation between MUAs and other areas, especially if housing were to be restrained in these areas compared to the MUAs. To avoid this situation the employment land allocations for each District outside the MUAs should be adjusted downwards so that they cater only for local needs. The excess to this should be allocated on a pro-rata basis to the MUAs. If problems arise in accommodating housing development, the sub-regional foci should accommodate excess housing or industrial development. It follows from this that industrial land allocations need to be made on a maximum basis outside the MUA, except where local needs would justify any increase (ie where it is subsequently found that the maxima have been set too low to cater for these) or where there is no room left in the MUAs for any other housing or industrial development.

**E8: Should employment land requirements set out in the table below be adjusted to take account of:**

	Yes	No	Comments and Area comments relate to:
Number and type of households	✓		
Anticipated changes in past trends	✓		
Labour supply growth	✓		
Population	✓		
The need to provide a portfolio of employment sites	✓		
Increased need for waste management facilities, see waste Options.	✓		
Areas of deprivation and employment need	✓		Unemployment and deprivation on an area basis is the most important issue
Other suggestions	-	-	All these matters are important, but they should be subject to the need (a) to reverse past trends involving labour supply and population growth and (b) to concentrate investment in the MUAs.

## What to think about

Ensuring an adequate supply of employment land is essential for the Region's economic prosperity. Where there are not sufficient brownfield sites available, meeting the employment land requirements set out in table XXX could have an impact on greenfield/Green Belt sites. Growth in employment development could also have implications for the environment and climate change, in terms of access to employment sites and emissions through economic activity.

## Protection of Employment Land

The loss of employment land to alternative uses is an important issue facing the Region. The Regional Employment Land Survey has noted that over 200 hectares of employment land has been lost to alternative uses in each of the last two years. The pressure on employment land is likely to increase in the future particularly in light of the challenging housing targets identified earlier in the Spatial Options. There is a need to ensure that employment sites, which can contribute to the portfolio of employment land, are protected from alternative uses. The WMRSS could give guidance on the protection of employment land or this could be done through LDFs. Consideration also needs to be given to ensure that waste management sites are protected from competing uses particularly given the issues identified in the waste Options. Waste management activities are often located on employment land.

### What to think about:

Failing to protect employment land could have a negative effect on the Region's economy. Equally, there is a need to ensure that redundant employment land is released for alternative uses where there is no potential for re-use or redevelopment.

### **PEL1: Should the WMRSS give more guidance on the need to retain employment sites which can contribute to the portfolio of employment land?**

Yes.

Policy PA6 currently sets out the aim of providing and maintaining a range and choice of readily available employment sites to meet the needs of the regional economy. However it does not actually state that good quality sites need to be protected from other uses, in order to provide balanced and sustainable growth.

The safeguarding of employment land will also be important for ensuring that sufficient land is available to meet the region's future waste management requirements (see also response to Question W1).

### **PEL2: Should the WMRSS identify the need to protect waste management sites from competing uses?**

Yes.

We agree with the general principle that existing, well-located waste management sites of regional or sub-regional importance should be safeguarded from competing uses, wherever possible. However, not all sites are well-located, so the RSS should also support the relocation

of poorly-located facilities to sites that have better accessibility and/ or less impact on amenity or the environment. As the RSS is part of the development plan for all of the local planning authorities in the region, there is no reason why it should not include a general policy safeguarding existing waste management facilities of regional or sub-regional significance where the re-use of sites is subject to planning control, which can be applied by WPAs when determining planning applications affecting such facilities. However, such a policy could only apply to redevelopment schemes and changes of use that fall within the scope of planning control. The extent to which existing facilities can be safeguarded may in some cases be compromised by the definition of the use. For example, a waste management use falling within Class B2 may lawfully change to another B2 use without requiring permission unless it is subject to conditions preventing such a change of use (see also responses to Questions W3 and W9).

## **Regional Investment Sites**

Regional Investment Sites (RIS) are sites of between 25 and 50 hectares with development restricted to high-quality developments supporting the objectives of the Spatial Strategy. Examples of high quality developments include offices which could not be accommodated within a strategic or city centre and research and development facilities.

WMRSS Policy PA7 requires that at least one RIS should be available to serve each High Technology Corridor (HTC) and Regeneration Zone (RZ). There are a number of gaps in existing provision with no sites currently identified to serve the Central Technology Belt, the West Birmingham and South Black Country RZ or the Coventry and Nuneaton RZ. There are also questions over the adequacy of provision within the East Birmingham/North Solihull RZ and the Coventry-Solihull-Warwickshire HTC.

The WMRSS Review should also consider whether further clarity is needed on the type of uses which can be located on a RIS and whether the existing guidance in the WMRSS is sufficient.

The Preferred Option will also provide further clarity on the role of offices on RIS. There is a need to ensure that office development on RIS does not conflict with the objective of the WMRSS and PPS6 to focus large scale office development within the network of strategic and city centres.

### **What to think about**

Filling the gaps in RIS provision could create significant employment opportunities and contribute to the diversification of the regional economy. Meeting gaps in provision could have implications on greenfield sites, if no brownfield sites are available.

### **RIS1: Do we fill the gaps in the provision of RIS?**

[See our answer to RIS2.](#)

**RIS2: If yes, what processes should be used for filling the gaps in provision?** For example, the WMRSS could set the context for sub-regional studies which would consider gaps in provision.

[We agree but consider that the RSS such studies should deal with demand for and supply of both RIS and MIS, including whether there is scope to amalgamate them.](#)



**RIS3: Is there a need to change the policy on the control of uses on RIS?** The current WMRSS policy restricts development to high-quality uses falling within use class B1 for example, offices and research and development facilities. In some parts of the Region high quality B2 (general industrial) uses are also permitted.

**B1a, as a town centre use, should not be allowed on RIS or MIS sites. The RSS should make this clear.**

## Major Investment Sites

Major Investment Sites (MIS) are large sites in the order of 50 hectares which are intended to accommodate very large scale investment by single users.

WMRSS Policy PA8 requires that the Region should have two MIS readily available for development at all times. Antsy in Rugby is the only MIS available for development. However, the WMRSS states that its designation as an MIS should be reviewed if a major new investment by Marconi is not forthcoming, as now appears likely. The Region is therefore currently unable to meet the requirement of this policy. Another MIS will become available at Wobaston Road in Staffordshire, although this site needs infrastructure investment and land contamination treatment. Outline planning permission has been granted by South Staffordshire Council to Advantage West Midlands to develop the Wobaston Road site for uses including a MIS. The proposal is for a 135,000 sq. metre MIS development on 45.5 hectare site.

### What to think about

Failure to provide a minimum of two MIS could lead to the Region failing to attract or accommodate investment by a major single user with the potential to create significant employment opportunities. If extra provision is needed there could be implications for greenfield sites, if no brownfield sites are available. MIS could remain vacant for years if no user is identified.

**MIS1: Do you think that the WMRSS has adequate MIS provision?** You should also consider the adequacy of MIS provision in the event that Ansty is not maintained as a MIS.

**See our comments in relation to RIS.**

**MIS2: If no, what are the options for additional provision?**

**See our comments in relation to RIS.**

**MIS3: Should more flexibility be introduced to the MIS policy?** For example: the current policy restricts occupation of a MIS to a single user. Do you agree that this should continue to be the case?

**Yes.**

**If there is evidence of continuing demand for large sites, they should be protected for single use. Otherwise, they should be incorporated into the general supply if they are within the Major Urban Areas. Outside the MUAs any commitments should not be renewed. In relation to uses, there may be scope for high quality B8 also to be considered. B1a should not however be allowed under any circumstances (see further below).**

## Regional Logistics

**Objective:** To identify the number and broad location of regional warehousing and distribution facilities.

Regional Logistics Sites (RLS) are employment sites that concentrate warehousing and distribution facilities. Defined in Policy PA9 as 50 hectares or more (approximately 71 football pitches). Hams Hall is the only RLS in the Region and the supply of land there is limited, 34 hectares remains available.

The Midlands Way, see page [aaaa](#), is exploring the possibility of a Midlands Level Logistics Strategy, looking at the issue across the two Regions. This is timely as both RSSs are being revised at a similar time.

### Regional Logistics Studies

Stage One, June 2004, aimed to find out what is influencing the logistics industry in the short, medium and long term at both the national and regional level, and identifies robust criteria for assessing and choosing Regional Logistics Locations and RLS.

Stage Two, September 2005, built on Stage One by identifying the level of need and the number, size and broad location of additional logistics facilities. It also provided advice on drafting future WMRSS policy and reviewed the criteria identified in Stage One. The conclusions noted the strong potential demand for future RLS and identified a number of broad locations where such demand could be accommodated. It highlights the importance of genuine modal choice for logistic sites, and promotes that future sites should have access to the rail network.

#### What to think about:

Meeting the potential demand for RLS could attract new investment to the West Midlands and create significant employment opportunities, for example a 75 hectare site could generate 6,100 local and regional jobs. By making sure that RLS have rail access the Region could encourage a more sustainable form of freight transport. There may also be parking issues that need to be addressed through policy.

**Environment:** There could be implications for greenfield sites, and on the Green Belt, if there are no brownfield sites available to meet demand. This could impact on the biodiversity of the immediate area.

**Climate Change:** Potential impacts on climate change will need to be minimised and where appropriate, mitigation and/or compensation may be required.

**RL1:** Significant growth in logistic provision in the Region is anticipated. **Should part of this growth be accommodated on RLS?**

Yes.

**RL2:** If yes, how many RLS are needed?

The Regional Logistics Study sets out the requirement and we have no reason to dispute this.

Stage Two of the RLS study sets out a number of choices for the future provision of RLS based on the Great Britain Freight Model and market data. These produce a range of potential requirements for RLS including two 75 hectare sites based on a continuation of current market trends (39% of warehouses over 25,000 m<sup>2</sup> locating on rail linked sites) or four 75 hectare sites based on an increase in the proportion of large distribution facilities being located on a RLS (70% of warehouses over 25,000m<sup>2</sup> being located on rail linked sites).

**RL3: The Stage Two study recommends the following criteria for RLS. Do you agree?**

Criteria	Yes	No	Comment
At least 50 hectares of development land available.	✓		
Good rail access. Defined as: a generous loading gauge which is capable of accommodating inter modal units on standard platform wagons, the ability to handle full length trains, available capacity to run freight train services and permits full operational flexibility.	✓		
Has good quality access to the highway network. Defined as being served by the national motorway network or major non-motorway routes which show low levels of network stress (congestion) and allow reasonable vehicle operating speeds.	✓		
A suitable configuration which allows large scale high bay warehousing, inter modal terminal facilities, appropriate railway wagon reception facilities and parking facilities for all goods vehicles both those based on the site and visiting the site.	✓		
A need for such facilities due to demand from the logistics market which cannot be met in the medium to long term by existing capacity.	✓		
Located away from incompatible neighbours, allowing 24 hour operations no restrictions on vehicle movements.	✓		
Has good access to labour. Defined as being a sub region of employment need, having reasonable levels of qualification at NVQ Level 1 and 2 and opportunity to improve qualification levels, being a net exporter of lower order labour, and having a competitive wage rate for relevant lower order occupations.	✓		
Minimising the impact on the local environment.	✓		
Suggest other criteria	-	-	

**RL4:** WMRSS Policy PA9 currently identifies Telford and North Staffordshire as being priority locations for RLS. A rail freight facility is already under construction in Telford which will play an important sub-regional role serving the west of the Region. No RLS provision has been made in North Staffordshire. **Is North Staffordshire still an appropriate location for RLS provision?**

Policy PA9	Yes	No	Comment
North Staffordshire			It depends where the destination of the goods is. If the main flows are to the north of the UK then North Staffs is a sensible location. If however the flows are to the east and south of the UK and cross-channel then a site connected to the east coast and the south would be more appropriate.

The Stage Two RLS study identifies the broad areas below as having potential for a RLS.

**RL5: Do you agree that these areas are the best broad locations for RLS provision?**

Broad Location	Yes	No	Comment
A Based around the M6 Toll, A5, A38, West Coast Main Line (WCML) and Derby to Birmingham railway line transport corridors. Covers the administrative areas of the eastern part of East Staffordshire, Lichfield and Birmingham to the north of the M6.	✓		
B Based around the M6 Toll, M6, M54, A5, Stour Valley railway line, Cannock Branch railway line and the Wolverhampton to Telford railway line transport corridors. Covers the administrative areas of Wolverhampton, South Staffordshire (except the area to the west of Dudley), Walsall and Cannock Chase.	✓		
C Based around the M6 Toll, A5, M42, WCML, Derby to Birmingham railway line, and Whitacre and Nuneaton railway line transport	✓		

	corridors. Covers the administrative areas of Tamworth and North Warwickshire.			
D	Based around the M6, M69, A5, WCML and Rugby and Birmingham railway line transport corridors. Covers the administrative areas of Nuneaton and Bedworth, Coventry and Rugby.	✓		
Other suggestions		-	-	Evidence

**RL6: Should priority be given to the extension of existing RLS where there is spare capacity available at the existing rail freight terminal?** Alternatively, where sites cannot be extended should satellite sites be considered? Satellite sites would utilise the rail freight infrastructure at an existing RLS. A pre-requisite for a satellite site would be the availability of spare capacity at the existing rail terminal.

The current and future flows need to be taken into account. Perhaps a reason for the extra capacity is because the facility is not currently located usefully in relation to these.

**Evidence Base:** The Regional Logistics Sites Studies supporting this approach can be seen on [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

## Strategic Centres

**Objective:** To identify investment priorities within the strategic network of centres.

Strategic centres are those higher ranking town and city centres that serve the Region and where most spending occurs ranging from Birmingham to Lichfield. This leaves a large number of other centres, individual towns and district or local centres that have an important but not strategic role where lower levels of spending occur e.g. Bromsgrove, Bilston and Droitwich. An essential characteristic of centres is their greater accessibility which needs to be maintained and improved wherever possible.

Having investment priorities means deciding where major new retail, leisure and office investment should go in the Region.

### What to think about:

Government guidance in PPS6 sets out what needs to be thought about when deciding what is the right level of retail development in centres. The WMRSS builds on the advice of PPS6 to support the growth and health of all of the centres in the Region.

Vital centres are fundamental to the achievement of Urban and Rural Renaissance. The Preferred Option will need to reflect these principles of the WMRSS. It will also have to make sure that investment into strategic centres doesn't harm smaller centres including essential service centres in rural areas. It must also help to regenerate vulnerable centres and support

vital and viable market towns within the strategic network to make sure the best facilities can be accessible to all sections of the community. This relationship between different centres and their functions is referred to as 'balanced network'.

The Preferred Option will support local authorities with responsibilities for the strategic centres to be proactive in finding new development and in considering whether investment should be prioritised, compared to investment elsewhere including in other centres. The phasing of development will be an important part of reducing any adverse effects on neighbouring centres.

The distribution of new households, see page aaa, will affect which centres will grow and how, as will related employment needs based on new population or regeneration needs. Strategic Park and Ride policies and Parking Standards policies together with improvements to public transport will also have an impact on centres.

Dudley is not included as a Strategic Centre as it is proposed to be deleted from the network of strategic centres in the draft Phase One Revision relating to the Black Country. However, within the draft Phase One submission, Merry Hill/Brierley Hill is proposed to be included within the network of strategic centres, a proposal also recognised in the following section.

The foci, and Burton upon Trent, are all included in the network of strategic centres so the role and scale of housing development and population/household growth directed to them will need to be reflected in terms of the related retail and leisure provision.

An example of this relationship between population and household growth and the development of strategic centres is demonstrated in the WMRSS Phase One submission: Black Country. In this case, the planned growth of its four Strategic Centres (including the proposal for Merry Hill/Brierley Hill) is based on policy assumptions about growth in population and incomes derived from an overall long term economic strategy. The planned growth in main town centre uses in the Black Country, including ambitious requirements for new retail and office floorspace, is therefore part of a comprehensive strategy to achieve Urban Renaissance and is deliberately not based on projecting past trends; rather, it is based on an integrated package of proposals to achieve economic and population growth.

Cultural assets can act as a catalyst and anchor for attracting retail and other commercial development.

### **The Regional Centres Study**

This study was carried out to help to decide where investment should go, and should not go. The study included Office for National Statistics 2003 based district level household forecasts, which are the same as the higher level of housing set out in the Section 4 (4) Briefs, see [www.wmra.gov.uk/page.asp?id=208](http://www.wmra.gov.uk/page.asp?id=208). It did not take into account the housing distribution set out in earlier sections.

Once we have your views on the Regional Drivers, further re-runs of the Regional Centres Study may be needed to develop the Preferred Option.

Retail and leisure development are driven by the amount of people in a centre or its catchment area. Therefore, where retail and leisure development goes is often worked out after decisions have been made in terms of the distribution of housing/population development.

The Centres Study contains varying levels of additional retail floorspace requirements across the network of strategic centres, however, the consultants concluded that while expenditure on leisure services in the West Midlands Study Area would grow by 34% between 2005 and 2021, approximately 60% of this growth would be absorbed by restaurants, cafes and bars facilities vital to the future health of all of the Region's centres and could not be specifically distributed between centres. With regard to major leisure facilities, standards devised by Sport England could be used to assess the likely consequences of the distribution of new households and population in terms of specific new facilities. The location of these facilities should in the first instance be sought in or adjoining the strategic centres, see PPS6. Similarly new and improved cultural facilities to serve the increased population within the Region will be needed with the focus of provision in the network of strategic centres where such provision might be used as the catalyst for more general centre regeneration.

The recommendations of the Centres Study for new comparison retail floorspace development (Study Table 8.1) can be shown as ranges of development for the various levels of centre with the upper end reflecting the 2003 population/household projections, see table below. Comparison retailing relates to shopping for goods other than food and drink and everyday items. The Preferred Option may include a table of this sort in a reworked Policy PA 11, to show the broad retail investment priorities within the network of strategic centres.

<b>Net Additional Comparison Retail Development in Centres within the Network of Strategic Centres 2005-2021</b>		
Level 1 centre	Up to 150,000 m <sup>2</sup> net	Birmingham
Level 2 centres	up to 50,000 m <sup>2</sup> net	Coventry, Stoke-on-Trent City Centre (Hanley),
Level 3 centres	up to 30, 000 m <sup>2</sup> net	Solihull, Worcester, Shrewsbury, Telford, Hereford, Burton, Leamington.
Level 4/5 centres	up to 20,000 m <sup>2</sup> net	Stafford, Redditch, Sutton Coldfield, Kidderminster, Stratford, Tamworth, Nuneaton, Rugby, Newcastle-under-Lyme, Cannock, Lichfield.

N.B. The above figures do not discount commitments and represent new requirement over and above existing provision, development proposals in individual centres that involve some replacement of existing provision can be larger than the above figures.

<b>WMRSS Phase One Revision: Black Country proposed Comparison Retail Development</b>	
Although the Centres Study includes figures for Black Country Strategic Centres, the following proposals have already been submitted to the Secretary of State in the RSS Phase One Revision and need to be taken into account in the current consultation:	
<b>Comparison retail floor space 2004-2021 (including commitments)</b>	
Wolverhampton	54,000 m <sup>2</sup> (gross)
Brierley Hill/Merry Hill	51,000 m <sup>2</sup> (gross)
Walsall	45,000 m <sup>2</sup> (gross)
West Bromwich	35,000 m <sup>2</sup> (gross)
Non-strategic centres	51,000 m <sup>2</sup> (gross)
<b>Total</b>	<b>236,000 m<sup>2</sup> (gross)</b>

The Study was based on a number of assumptions including moderate expenditure growth, and significant increases in floorspace efficiency and the role of e-tailing. To see the Study go to [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

As indicated above, the draft Phase One Revision: The Black Country includes specific gross retail floorspace requirement figures for 2004 to 2021. These figures are derived from the same technical basis as the Regional Centres Study, and reflect the growth agenda for the Black Country.

**SC1: Do you have any comments on these levels of provision?**

We recognise that these totals have been adjusted to take account of the 2003 housing projections, and differ from the Regional Centres Study table 8.1. We consider nevertheless that, in respect of consumer expenditure, they are rather ambitious, and, at least in part, reflect aspirations rather than existing trends. We would also point out here that the ambitious housing targets will only be realised on an area basis if there are sufficient employment opportunities to support them. The MUAs in particular are likely to continue to lose manufacturing employment on which a large measure of consumer demand currently relies. Furthermore it is unclear whether the policy framework will be enough to steer service based employment developments, such as offices, to the MUAs in the desired amounts to offset this, whilst restricting such developments outside the MUAs to those genuinely needed to serve their communities, unless the RSS were to take a very tough approach in relation to non MUA and out-of-centre office developments (see below). The main issue therefore is related to the need to ensure that a cautious phasing and monitoring regime is applied to ensure that the stronger centres do not take a disproportionate share of comparison retail development at the expense of more fragile centres, on the basis of over-optimistic projections of consumer spending growth - otherwise this could set off a spiral of decline in those weaker centres, with trade being diverted away from them. The monitoring and phasing framework should make use of best evidence and objective research regarding floorspace efficiencies and the role of internet and other specialised forms of retailing.

**SC2: Do you have any comments on the assumptions included in the Regional Centres Study?**

We would point to the difference between the assumptions in the Regional Centres Study and the more aspirationally-based Black Country Centres Study.

**Significant Applications**

The RPB is consulted on retail planning applications that are above 10,000 m<sup>2</sup> gross floorspace. This is to see if the applications conform with and support the WMRSS or not cause significant harm to the implementation of the WMRSS. If a planning application falling below this threshold is thought to be regionally significant, it will also be referred for a conformity decision.

The Centres Study sets out new thresholds for comparison shopping developments, see the table below:

<b>Location Category</b>	
Within or on the Edge of a Strategic Centre	m <sup>2</sup> gross
Tier 1 – Birmingham	25,000
Tier 2 – e.g. Coventry	20,000
Tier 3 – e.g. Shrewsbury	10,000
Tier 4 – e.g. Stafford	10,000
Tier 5 - e.g. Cannock	10,000



Within or on the Edge of a Non-Strategic Centre	10,000
Out of Centre	10,000

The Preferred Option may change Policy PA11 and include a range of new thresholds for referral to the RPB for a conformity opinion.

**SC3: Do you have any comments on these suggested thresholds for referral to the RPB?**

Yes. The thresholds should more accurately reflect the results of the analyses with the Regional Centres Study, which (for example) identified expenditure capacity of around only 5,000 sq.m. net for Lichfield under the preferred options, and the application of the threshold approach should also reflect the overall strategy of the RSS as represented for example through Policy PA1.

**Upper limit for development**

Whilst the emphasis in the WMRSS is on the network of strategic centres however the role and importance of local centres is recognised. Future development in these other non-strategic centres, i.e. ‘free standing’ settlements and ‘district’ centres within larger settlements, will be of a modest scale, varying according to local circumstances and local need. It might be necessary to propose some upper limit for development in these other centres in the Preferred Option for example 10-15,000 m<sup>2</sup> gross, in order to ensure that large developments that should be focussed in the network of strategic centres do not occur elsewhere thereby undermining the role of the strategic centres.

**SC4: Should an upper limit for development in non-strategic centres be introduced in order to protect the role of the strategic centres?**

Yes.

The WMRSS, para 7.61 provides an indication of strategic centres that are worthy of particular attention either as being within the MUAs, the focus of Urban Regeneration, or as centres that were considered to be particularly vulnerable (some centres appear under both criteria), the following Options suggest different emphasis for comment.

**Accessibility**

The Centres Study defined centres that are least locally dominant meaning people who live there travel to more distant centres. This policy approach aims to emphasise/prioritise extra provision in these centres. It gives priority to Lichfield, West Bromwich, Cannock, Sutton Coldfield, Newcastle under Lyme, Stratford upon Avon, Kidderminster and Walsall. This recognises the sustainable travel benefits of provision, on a limited scale, in centres outside the Strategic Centres.

**SC5 Do you think that WMRSS policies should give priority to centres where people currently travel away for retail and leisure?**

No.

The question implies that some smaller centres should be upgraded in hierarchy set out in the above location category table. If this is the intention, we disagree, because it could lead to some smaller centres, such as Lichfield, taking trade from other larger but more fragile ones, such as

Walsall. At all times, in any given centre, comparison retail development should be in scale with the catchment.

## Regeneration

This policy approach aims to identify centres in need of regeneration as shown in the Centres Study. These are centres described as:

- showing some signs of weakness
- showing significant signs of weakness
- very weak

These priority centres would be: West Bromwich, Cannock, Rugby, Walsall, Lichfield, Newcastle-under-Lyme, Nuneaton, Tamworth, Kidderminster, Sutton Coldfield, Redditch, Stafford and Telford.

**SC6: Do you think that WMRSS policy should support this regeneration approach?**

Yes.

Yes in principle, but there is a need to ensure that some centres that have significant weaknesses, such as Walsall, are not adversely affected by prioritisation of others in the same area, such as Lichfield, that are not as weak. The criteria need careful consideration, taking into account such matters as the socio-economic characteristics of the catchment and scale and impact of new development implied by such prioritisation. And this must not be capable of being used by some centres as an excuse to upgrade their position in the locational hierarchy.

## Market/competitiveness/opportunity

This policy approach uses the same information as the regeneration approach but places the emphasis on the centres described as:

- healthy
- very healthy
- aspirations to expand.

These priority centres would be: Birmingham, Merry Hill/Brierley Hill, Coventry, Hanley, Wolverhampton, Worcester, Hereford, Burton-upon-Trent.

**SC7: Do you think that WMRSS policy should support this market led/opportunity approach?**

No.

The regeneration approach should be supported, subject to the provisos about scale and impact as discussed above.

For information, the above lists of centres in SC5-7 include those in the Black Country, although it should be noted that Draft RSS Phase One proposals have already been submitted to the Secretary of State.

## Offices

The development of offices is considered in national planning policy (PPS6) as a use appropriate to, and to be sought in town centres. However, the activities in offices vary considerably. To some extent this variation is recognised in the Use Classes Order, with Class A2 covering services that are 'principally to visiting members of the public' Financial Services, Professional Services (other than health and medical services) and other services which it is appropriate to provide in a shopping area). Class B1a relates to offices other than use within Class A2. PPS6 see [www.communities.gov.uk/index.asp?id=1501955](http://www.communities.gov.uk/index.asp?id=1501955) looks to local authorities to apply a sequential approach to the location of office development starting in town centres and only considering first, edge of centre and then out of centre development if it cannot be accommodated within or close to the town centre.

Office development in relation to centres is linked to the local labour force and the ease of access to centres. It is less related to the amount of people who live in the centre or catchment area, than retail and leisure activity. Therefore, office development is more often seen as an economic driver, and a vital part in the diversification of local economies that have been heavily dependent on manufacturing in the past and where the latter employment opportunities are diminishing. There are strong links to the employment section, see page aaa, and the housing section in particular the distribution of new development. The responses to the Regional Drivers will be taken into account when developing the Preferred Option policies with respect to offices.

Recent trends in the location of office development have favoured local authorities outside the MUAs. Apart from Birmingham City Centre, office development both within and outside the MUAs has been predominantly located out-of-centre. These trends could affect the success of Urban Renaissance. Offices are particularly needed in some of the older industrial areas within the MUAs to compensate for the declining manufacturing sector and within the respective town centres in order to improve the general well being of the centre.

There has also been an increase in the amount of home working particularly in rural parts of the Region. This follows an increase in the availability of ICT infrastructure, including broadband.

### **What to think about:**

Ultimately, where the offices will go, especially if built to meet the levels of need that is predicted in the Centres Study, will have to be thought about along with the housing and employment Options. Office development must continue to support the principle of Urban Renaissance. Economic diversification and the role of the foci will also have to be thought about.

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. Travel arising from new developments should be minimised with the use of public transport in travelling to offices sought. 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. The promotion of the reuse of buildings for offices could reduce land take and environmental impact.

### **The Regional Centres Study**

The Centres Study gives forecasts of the levels of office development that might be needed in the Region, see [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121) . These forecasts are based on work by Cambridge Econometrics that uses growth rates in the finance and business service sectors as

a proxy for the totality of office development and current distribution as the basis for allocating the forecasts.

Based on recent development rates, the levels of provision set out in the Centres Study are ambitious and will need pro-active planning initiatives by virtually all authorities and partners across the Region. The greatest effort will need to be focussed on providing opportunities in and adjoining centres, only Birmingham City Centre seems to have any impetus for significant centre development.

The Study includes projections for additional office floorspace provision for the Strategic Centres and the rest of the Region. The rest of the Region provision includes both capacity within non-strategic centres and out-of-centre i.e. away from any existing town or city centre big or small. However, there may be some concentrations in out of centre business park style developments e.g. Birmingham Business Park, Wolverhampton Business Park. The table below sets out levels of provision under the distribution scenarios that perform best in the evaluation matrix in the Study by strategic centre and Local Authority. In some cases ranges are included in the table with figures varying across the range of scenarios. These figures provide floorspace to be provided in non-strategic centres, including market towns and smaller settlements, according to their needs in accord with PPS6. The issue of approaches to out-of-centre provision is considered below.

**Table xxxx** below shows the projection work carried out for the Regional Centres Study on the basis of current trends. Figures proposed for the Black Country as part of the draft Phase One Revision are shown separately.

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 give the opportunity for this evidence base to be subject to practical and policy consideration, in particular incorporating employment need. Within this context preferred office allocations will have to take account of housing growth distribution.

In contrast, the proposals for office floorspace in the draft Phase One Revision for the Black Country have already taken policy considerations in to account and are very much based on an assessment of what is required to achieve economic restructuring in the sub-region to support the overall Urban Renaissance strategy. The four strategic centres in the Black Country are the proposed engines of economic growth in the sub-region and Phase One Studies have demonstrated that they have sufficient capacity to meet the ambitious requirements for additional office floor space identified in the table below see [www.blackcountryconsortium.co.uk](http://www.blackcountryconsortium.co.uk)

**Table xxxx Additional Office Floorspace from 2001 to 2021 ('000 m<sup>2</sup>)**

Local Authority	LA Total	Including Strategic Centre Provision
Birmingham	780 - 860	Birmingham Centre (480-530) Sutton Coldfield (10-20)
Coventry	260 - 290	Coventry Centre (140-160)
Solihull	250 - 260	Solihull Centre (100)
Telford	160 - 190	Telford Centre (70-90)
Warwick District	140 -160	Leamington Spa (40-50)
Stratford-upon-Avon	110 - 120	Stratford (20-20)
Stafford Borough	90 - 110	Stafford (30-40)
Lichfield	80 - 100	Lichfield City (30-40)
Wychavon	90	
City of Stoke on Trent	80 - 90	Stoke-on-Trent City Centre (Hanley) (20)
Herefordshire	80 - 90	Hereford (30)
East Staffordshire	80	Burton (20)
Worcester	60 - 80	Worcester Centre (40-50)
Newcastle-under-Lyme Borough	60 - 70	Newcastle (40)
Shrewsbury and Atcham	60	Shrewsbury (20)
Redditch	50 - 60	Redditch (30-40)
Rugby	50 - 60	Rugby (20)
Wyre Forest	50 - 60	Kidderminster (30)
Cannock Chase	40 - 60	Cannock (10-20)
Malvern Hills	50	
South Staffordshire	50	
Nuneaton and Bedworth	40	Nuneaton (20)
Tamworth	40	Tamworth Centre (20)
North Warwickshire	40	
North Shropshire	30	
Staffordshire Moorlands	30	
Oswestry	20	
Bridgnorth	20	
South Shropshire	10	
Bromsgrove	10	

**RSS Phase One Revision – Black Country – proposed Office Floor space**

Although the Centres Study includes figures for Black Country Strategic Centres, the following proposals have already been submitted to the Secretary of State in the RSS Phase One Revision and need to be taken into account in the current consultation:

**Growth in office (B1a) floor space 2004-2021 (including commitments) within strategic centres**

Wolverhampton	up to 186,000 sq m (gross)
Brierley Hill/Merry Hill	up to 186,000 sq m (gross)
Walsall	up to 186,000 sq m (gross)
West Bromwich	up to 186,000 sq m (gross)
Outside of strategic centres	up to 51,000 sq m (gross)
<b>Total</b>	<b>up to 845,000 sq m (gross)</b>

## **O1: Do you have any comments on Table xxxx that will help the RPB to develop an office provision policy?**

The numbers set out in this table assume that the proportion of office development being developed outside the MUAs could fall from 60% to 40%. But if the objective is to concentrate economic growth into the MUAs in order to reverse adverse trends, the issue is not about proportions, but about drafting a policy that only provides for offices outside the MUAs that are necessary to cater for local service needs. Inward investment that has a larger impact should go into the MUAs, and the policy should require this. The proportion issue is therefore at best a distraction from the objective as set out in the current PA1, and the guiding principle of an urban renaissance. Moreover, because PPS6 absolves offices for splitting operations in order to fit into centres (as with retailers) it is generally the case that, aside from the specific location of Birmingham City Centre, the larger the office, the more likely it is to go outside a centre, and indeed outside the MUAs, given developer preferences. Changing proportions of intended development take up will not improve take up to the benefit of the MUAs – only a sequential policy that requires such investment to go into centres in the MUAs will have any hope of doing this. Such a policy should also treat office developers like retailers: ie they should be required to split operations so as to be able to fit into the centre in question. Even so, two further points should be recognised:

- There remains an extremely large stock of planning permissions for offices in out-of-centre locations (mostly, though not completely, outside the MUAs). A policy should be drafted that requires that when current permissions lapse in these locations, they must not be renewed.
- According to the 2005 Regional Annual Monitoring Report, around 90% of office take-up in the Birmingham-Black Country-Solihull conurbation has in recent years been happening in Birmingham City Centre, because, as the regional centre, it is well connected to a large labour force, as well as central London by rail. Yet Birmingham does not appear to be doing as well as some other regional centres in attracting office development. Accordingly, policy should support the expansion of Birmingham City Centre if necessary otherwise office developers may go to other already-favoured regional centres outside the West Midlands or to out-of-centre locations. Whilst every effort should be made to attract offices to urban centres as a whole, we should avoid the situation where there is an artificial restraint on office development in Birmingham that is justified by the perhaps mistaken belief that such developers would then look elsewhere in the conurbation. Rather, public transport connections between the rest of the MUA and Birmingham need to be improved in order for the MUA as a whole to share in the employment benefits of office growth in Birmingham City Centre, and indeed to increase the ease of access from the large catchment that would attract office developers to the city.

If these policy improvements are not put in place, the MUAs will continue to suffer adverse trends in relation to office development whilst their manufacturing stock continues to decline. This would in turn perpetuate and perhaps even exacerbate out-migration from the urban areas to the Shire areas and the south-east of England, especially if the housing and infrastructure plans for the south-east were to increase supply and capacity there. Even to facilitate the limited shift in proportions as envisaged in the table set out above, policy will have to be significantly tougher than the current RSS and PPS6.

**O2: Do you think the Centres Study has identified the right levels of additional office floorspace/development?**

No.

The Regional Centres Study envisages a total regional requirement of 3.74sqm for offices. This works out at an average of 187,000sqm between 2001 and 2021. But according to the West Midlands Regional Annual Monitoring Report 2005, table APP.P14, office developments having been running at an average between 2001 and 2005 of 199,392sqm, about 12,000sqm per annum more than the Regional Centres Study projection. Since the 2001-2005 period coincided with a downturn in the property market caused by the stock market correction and the adverse impact on financial services, a big office user, this implies that the Regional Centres Study is erring slightly on the pessimistic side. However when it comes to setting out development levels for the various parts of the MUAs, the Study is very optimistic, and, as stated above, will require a significant toughening of policy to achieve.

**O3: If no, do you have any robust evidence that can support your comment and the development of the Preferred Option?**

The Regional Annual Monitoring Report 2005, tables APP.PA14 and APP.PA15 provides evidence on trends in the location of office development across the region. This shows clearly that such trends do not currently operate in the MUAs' favour. They imply the need for the policy reforms which we have advocated as set out above.

**Out of Centre Offices**

As explained above, national planning policy is that office development should be handled in a sequential approach with development expected to take place in town centres in the first instance. However, it is unlikely that either all centres (in or adjoining the town or city centre) will have sufficient capacity to accommodate the sought for levels of office development or that all forms of office development can be accommodated in or adjoining centres e.g. some large headquarters offices. Local authorities will need to be more proactive than ever before if the levels of required office development are to be accommodated in and adjoining centres, or elsewhere. While the guidance in PPS6 and the sequential approach will be followed in the Region, the following Options raise questions as to whether the proactive role of local authorities should extend to specific allocations for office development out of centres but in locations with good accessibility.

The Regional Centres Study recognised the main element of office development that has recently taken place on out of centre locations and the continued supply of such sites with planning permissions. It also predicted that a significant amount of out of centre office development should be provided otherwise employment benefits are likely to be lost to competing areas.

The office scenarios in the Study involved between 40-44 % of the Region's office needs being met by the network of Strategic Centres, which compares to just 31% of recent completions in all of the Regions centres. In order to encourage/support non-strategic centre office provision into town/district centres this 40-44% figure needs to be increased so that out of centre development is exactly that, outside any centre big or small.

The following policy approaches are in relation to B1a uses (described above). As well as helping shape any new policy in the Preferred Option the answers given to the questions below

will help clarify the relationship between existing WMRSS policy on RIS that are provided for B1 uses and the town centres policies.

### **What to think about**

- What is the environmental, economic and social impact of out of centre offices?
- How will people travel to work?
- Are there places in the Region that would benefit from having offices in out of centre locations?
- Is the Region in danger of losing valuable economic development opportunities by not making specific provision for some out of centre office development?
- Is it appropriate to deal with proposals for out of centre office development on an ad hoc basis driven by applications rather than by site allocations?
- Even outside of centres offices should be provided in sustainable locations.

### **PPS6 sequential approach linked to RIS**

This approach would continue to support the PPS6 sequential approach looking to the Local Planning Authority or the applicant to argue the case for any out of centre office development on the grounds of inability to find a preferable site within or adjoining a centre. Within this approach, the role of the RIS as the 'first port of call' for out of centre office development would be clarified.

### **O4: Do you think this sequential approach to out of centre office development is the best approach?**

No.

Over the last few years, according to the Regional AMR 2005 table APP.PA15, about 14m<sup>2</sup> of every 20m<sup>2</sup> of office development has been going out-of-centre. This ratio has been quite stable in these years, so this clearly reflects entrenched market preferences. Nor is this likely to change soon: the AMR itself states that only about 32% of existing office permissions are in centres (let alone MUA centres) and about 85% of actual office development under construction in 2005 was happening out-of-centre. Indeed, there is evidence that the AMR understates the capacity for out-of-centre permissions because the Regional Monitoring system, in its treatment of spare capacity, only counts B1a permissions. It does not count open B class consents, even though offices are classed as B uses. For example the giant Fradley development in Staffordshire alone has two large sites available with open B class permissions which together provide 83.8 ha in gross site area. There is no control governing the amount of office use on these sites. Even if we were to assume that only about 70 % of this would actually be used for development purposes but that this could go for offices, this would give us a figure of 58.66ha, or 587,000sqm, amounting to 3 years of the total regional requirement based on the Regional Centres Study projection, as set out in the above table. Of course, not all of this is likely to be used for offices, but there are plenty other such open B class permissions being promoted by the property industry around the Shire Counties without account having been taken of them in the Regional Monitoring procedure. So it comes as no surprise that there is such a discrepancy between the proportion of the stock of planning permissions (based on the narrow B1a definition) and the actual take up rate of 85% in out-of-centre locations. Indeed, without a clear change in policy, it is likely to stay this way.



Given that the evidence clearly shows that the existing PPS6 approach has not worked, both in theory (the lack of any policy requirement to fit operations into centres by splitting if necessary) and in practice (in the numbers set out by the AMR itself), continuing the present approach will be totally inadequate even to go any way towards reversing the trend that favours the non-MUA part of the region in general and out-of-centre locations in particular.

### **Out of centre Office Policy, as a percentage**

This policy approach would involve the WMRSS setting out provision for out of centre office development in terms of a percentage of total provision for the local authority area on the basis that such specific provision is required as part of the employment land portfolio. Both this option and the following approach recognise the particular demands of parts of the office market.

The Regional Centres Study advanced scenarios that increased the percentage of office provision within the network of Strategic Centres to 40-44%, but also that this should be increased to take account of the continued policy preference for development in or adjoining centres. Either the larger centres, within the strategic network, or smaller centres outside the network. This approach recognises market demands while still seeking to improve centres.

As with the previous approach, the role of the Regional Investment Sites would be incorporated within the out of centre provision.

### **O5: Do you think WMRSS policy should set out maximum percentages for out of centre office development?**

No.

In the first place, in principle, planning is not simply about 'recognising the particular demands of the market' in offices, any more than it is in any other sector, for example retail: it is to locate the right activity in the right place.

Secondly, this approach in any case would undermine even the limited provisions of PPS6 which defines offices as a town centre use. It would add another loophole on top of the existing one that absolves office developers from splitting developments in order to fit into centres. It would take no account of the amount of out-of-centre stock still available on the market (unless open B class permissions were to be included in the capacity available). It could also result in more pressure for greenbelt development.

Thirdly, the rationale for out-of-centre office developments is often quoted as being that otherwise such developments would go elsewhere, out of the region. This is not borne out by evidence, given that there is plenty of out-of-centre capacity already available. But even if it were true, allocating a proportion of offices out-of-centre could simply result in existing offices in centres moving to take up the out-of-centre capacity to the detriment of the hoped-for inward investment.

### **O6: If yes, what percentage would you suggest?**

Not applicable.

## **Out of centre Office Policy, as a criteria**

This approach represents a midpoint between the two approaches described above by setting out criteria, in terms of specific development requirements, against which provision for out of centre office development would be judged.

Within the local authority level of provision, this approach would still involve making explicit provision for out of centre development i.e. out of centres be they big (part of the strategic network) or small while at the same time continuing to support the centres.

The criteria should be set so as to provide, in effect, a limit on the likely scale of out of centre provision e.g. above a certain minimum floorspace, ancillary to research and high technology activities, highly accessible to the national highway network.

As with the previous two approaches, the role of the RIS would be incorporated within the out of centre provision.

### **O7: Do you think that WMRSS policy should set out criteria for out of centre office development?**

No.

WMRSS policy in relation to the location of offices should state that:

- (a) No further office development will be allowed out of centre beyond existing commitments;
- (b) As out-of-centre permissions lapse they must not be renewed;
- (c) No further offices will be allowed anywhere outside the MUA beyond those providing a service for the local catchment;
- (d) If necessary MUA authorities should look to expanding their centres in order to bring a range of development sites to the market for offices (and that such sites should not be used for other purposes e.g. retail);
- (e) If all available capacity is used up in centres offices should be directed to sites adjoining public transport interchanges that can serve a wide surrounding catchment within the MUAs;
- (f) Large new office developments should be required to split their operations so they can be fitted into a centre; and
- (g) Large office developments expanding in situ should not be exempt from these provisions. Small office extensions in mixed use developments in out-of-centre locations will only be allowed where this does not change the overall character of the use from mixed/other forms of development to B1a.

### **O6: If yes, what criteria would you suggest?**

Not applicable.

## **09: Do you have any additional comments about out of centre office development?**

No.

**Evidence Base:** The technical work supporting the Strategic Centres Options, including Offices can be seen on [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

## **Regional Casinos**

**Objective:** To provide guidance to local authorities across the Region for the location of the new generation of casinos.

The Gambling Act 2005 introduced a new context for the gaming industry and in particular proposed a new range of casinos – regional, large and small.

Regional casinos are expected to have a minimum total customer area of 5,000 m<sup>2</sup>, and provide a large number of gaming machines offering unlimited jackpot prizes. They are major developments offering clear potential for regeneration, with potential to bring in major investment and economic regeneration. For example; a Regional casino may provide a range of gambling activities and hotel accommodation, conference facilities, restaurants, bars, areas for live entertainment and other leisure attractions that could include major sports and leisure facilities. The large (1,500 m<sup>2</sup>) and small (750 m<sup>2</sup>) casinos while of a smaller scale will offer many, albeit substantially fewer gaming machines with more limited jackpot prizes.

The Government is currently proposing one regional casino, nationally, and have appointed an Advisory Panel to help find the best site. No local authority proposals in this Region were on the shortlist published in May 2005. However, depending on the success of the first Regional Casinos there may be more in the future. A shortlist for future large casinos is being considered, this includes proposals from Dudley, Solihull (both submitted unsuccessful bids for the regional casino) and Wolverhampton. The Advisory Panel has to date sought the views of the Regional Assembly on both the general principle of a regional casino in the Region and the consistency of the shortlisted large casino proposals with the WMRSS. In the light of this experience policy options are considered below in relation to both the new regional and large casinos.

The Preferred Option will set out guidance for Local Planning Authorities to consider when proposing a Regional Casino or when considering a planning application.

### **What to think about**

The WMRSS aims to focus major new recreation and leisure developments in town and city centres, to promote Urban Renaissance. The WMRSS also recognises the importance of a number of locations spread across the Region as foci for tourism related development (Policy PA10). Whether they are in or adjoining centres or out of centre accessibility is a relevant consideration.

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. In the light of the latter, any future bids from the West Midlands 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.

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. 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 from noise and light could be generated by the larger casinos and need to be considered.

The WMRA together with Advantage West Midlands commissioned consultants to provide advice on the social and economic impact of potential casino development in the Region. The Final Report can be seen at [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

### **New Style Regional Casinos and Urban Renaissance**

This approach links the broad regeneration aims of the Government particularly in relation to regional casinos and Urban Renaissance, this would mean locations within the MUAs. It separates regional casinos from any presumption or priority location in town centres but proposes no additional criteria to those already in Government guidance regarding regeneration/community benefits and social impact and reference to PPS13 Transport. Given their smaller scale, should large casino sites be sought in town centres in the first instance, consistent with the PPS6 sequential approach.

**RC1: The guidance in the WMRSS for where Regional and large Casinos go should be based on assessing the impact on Urban Renaissance?**

Yes.

**RC2: Should WMRSS policy state that large casinos should in the first instance be in town and city centres?**

Yes.

Casinos are town centre uses as stated in PPS6 paragraph 1.8. Accordingly they should be required to be located according to the Sequential Approach, and subject to the tests of need, scale and impact, as well as accessibility and the need to travel. They could potentially add to centres' vitality and viability whilst they need to be in an accessible and sustainable location. Locating these facilities outside town centres would be contrary to overall objectives relating to urban renaissance and sustainability. Under no circumstances should they be located on employment land, greenbelt land or that identified for housing.

### **Local Criteria for New Style Casinos**

This approach would add more local/regional criteria to **RC1** but would not name specific sites/locations.

**RC3: Should the guidance in the WMRSS on where Regional and large Casinos go be based on assessing the impact on Urban Renaissance, RC1, however add more specific local criteria both in terms of location and potential benefits?**

Yes.

**RC4: If yes, what criteria would you suggest?**

Need to ensure that Casinos are carefully located so that they do not have an adverse impact on the core retailing function.

**Evidence Base:** The technical work supporting this approach can be seen on [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121) most relevant is the study on [aaaaaa](#)

**Find out more:** Gambling Act 2005 [www.opsi.gov.uk/ACTS/acts2005/20050019.htm](http://www.opsi.gov.uk/ACTS/acts2005/20050019.htm)

## Waste

**Objective:** To provide sufficient opportunities to meet identified needs of the West Midlands for waste management for all streams.

Once the Phase Two Revision is completed the waste policies and text in the Preferred Option will form the Regional Waste Strategy. PPS10 states that the WMRSS should include a concise strategy for waste management, looking forward for a fifteen to twenty year period. See [www.communities.gov.uk/embedded\\_object.asp?id=1500751](http://www.communities.gov.uk/embedded_object.asp?id=1500751)

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. The Preferred Option will set out a distribution of waste tonnages requiring management, a pattern of waste management facilities of national, regional and sub-regional significance, and supporting policies. It will specifically set out for each Waste Planning Authority (WPA) the tonnages of Municipal Waste and Commercial and Industrial Waste, that they should manage. It is up to each Waste Disposal Authority (WDA) how they choose to manage the Municipal Waste arising in their area, which means re-using, recycled or recovering value from waste, for example energy, or at the bottom of the hierarchy landfilling.

Depending on which technology each WDA chooses to manage their **Municipal Waste** there will be a need for a different number of facilities. Some technologies are commercially viable managing 50,000 tonnes of waste per year in which case just over 50 facilities would be needed in the Region. However, if WDAs choose to work together using a technology that is more economical at a larger scale, for example 250,000 - 500,000 tonnes per year, there may only be a need for 5 or 10 facilities.

The Region has almost half of England's **Energy from Waste** 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 settled on the technology or decided whether they will commission a single large facility or a number of smaller facilities at this stage.

For **Commercial and Industrial Waste**, and other wastes, the WPA need to allocate sufficient sites to manage the waste arising in the Region. Government policy was published in Waste Strategy 2000 which aims to reduce the amount of waste going to landfill and to increased recycling and recovery. A Review of England's Waste Strategy has been undertaken and the revised strategy is expected to be published early 2007, it will set out National targets for waste management.

In order to discourage tipping waste to landfill the Government has introduced two measures:

- 1) **Landfill Tax** which when it was first introduced rose at annual rate of £1 per tonne per year but it is now rising at £3 per tonne per year. It is currently at £21 per tonne and by 2012 will rise to £35 per tonne making the approximate cost of landfill in the Region rise from £30 per tonne to £50 per tonne in the next 6 years.
- 2) **Landfill Allowance Trading Scheme**. This sets targets for the amount of Biodegradable Municipal Waste each WDA can landfill using a 1995 base level and reducing it by 25% by 2010; 50% by 2013 and 65% by 2020. However, by 2020 we might be generating twice as much waste as we were in 1995. If WDAs don't meet the target the Government will impose a fine of £150 per tonne for each tonne of 'active' waste tipped over the allowance. That is 3 times the estimated cost of landfill in 2012.

### **What to think about:**

As household numbers and employment activity increases the amount of waste generated increases. The amount of Municipal Waste is closely related to **households** rather than population. It is important to maximise the amount of waste we segregate and recycle at home and work because once it is mixed together it becomes contaminated, for example newspapers mixed with the unclean tins, and cannot be recycled as easily.

We create more than twice as much waste at **work** as at home. The Government is seeking to break the traditional link between growth in economic activity and growth in Commercial and Industrial Waste arisings. 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 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.

**Climate Change:** The amount of methane gas given off from biodegradable waste is 20 times more damaging to the atmosphere than car exhausts. Therefore it is important to reduce the amount of waste landfilled, and this is one of the reasons why the Government has introduced the Landfill Tax and the restrictions on tipping Biodegradable Municipal Waste in the ground.

### **Managing your own waste**

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. Because there is more landfill capacity in the Region than elsewhere in England and the cost of landfill is relatively cheap. 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, (Municipal, Commercial & Industrial, Construction & Demolition) 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.

Different types of waste are managed in different ways and some facilities are small and collect from their local area such as composting facilities, whilst other facilities may need waste from a wider area to be economically viable, such as paper recycling mills. As a result of this, each WPA will not have facilities to manage all its own waste, but should provide enough capacity to provide for an amount which is equivalent to that which is produced locally from both household and commercial and industrial sources. As a general principle, the facilities should be as close as possible to the place where the waste is produced, or in central locations which are easily accessible to prevent unnecessary transportation, if economies of scale dictate such facilities are required.

This Region produces over 3 million tonnes of Municipal Waste per year from households and more than twice as much from work places, 7.3 million tonnes of Commercial and Industrial Waste, and even more through construction, demolition and excavation activities.

The Preferred Option will set out how much waste needs to be managed in each area, depending on the number of new households which will influence the amount of Municipal Waste and the level of Commercial and Industrial Waste which it is proposed should be diverted from landfill.

**W1: Should the WMRSS set out the principle that each WPA, or sub region, should manage waste in accordance with the Waste Hierarchy and allocate enough land in its LDDs 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?**

Yes (with qualifications).

We agree with the underlying principles, subject to the following qualifications. This is really three separate questions, relating to a) the way that waste should be managed, b) the amount of waste that should be managed in each WPA area, and c) how WPAs should make provision for waste management in their DPDs. Our comments are as follows.

- a) WPAs do not manage waste – they plan for the management of waste, which is a different thing. We support the general principle that waste should be managed in accordance with the “waste hierarchy,” and that disposal to landfill should be the least favoured option for managing waste. We agree that each WPA or sub-region should plan for the management of waste in ways that promote waste reduction, re-use and recovery rather than disposal to landfill.
- b) We agree with the general principle that WPAs/ sub-regions should aim to plan for the management of a tonnage of waste equivalent to the amount that is likely to arise within their area taking into account household growth and the diversion of waste away from landfill. However, the RSS can only require WPAs/ sub-regions to aspire towards self-sufficiency, as in practice it will not always be feasible to achieve this at WPA or even sub-regional level. It would be more reasonable - and more realistic - for the RSS to

require each WPA or sub-region to demonstrate that adequate provision can be made to manage the tonnages of waste likely to arise within their area to the extent that this is possible, practical and desirable, taking into account the fact that WPAs do not control waste and can only indirectly influence decisions on where it should be managed. Such decisions will normally reflect what is necessary to meet statutory requirements, and relative cost. The ability of a WPA to achieve local self-sufficiency may be affected by the following:

- Existing contractual obligations that require waste to be managed outside the area;
  - Existing large or specialised waste management facilities located outside, but close to, the area, which for economic reasons cannot be provided other than on a sub-regional or regional basis;
  - The availability of suitable sites and locations within the area where new waste management facilities can be developed;
  - Limited demand for waste treatment and management facilities from local industrial and commercial interests;
  - The economic viability of developing new facilities that may be required to manage the tonnages and types of waste arising within the area.
- c) A DPD can make provision for waste management in various ways and the RSS should not assume that site allocation is the best or only way to make provision for new facilities. Protecting a minimum reservoir of employment land and permitting waste management facilities to be located within employment areas gives greater flexibility and is more likely to be effective. Site allocations will not necessarily deliver waste management facilities where they are needed, unless the site in question is in the ownership or control of either the WPA or a waste operator, and unless the development of a new facility in that location is financially viable. Otherwise, the ability of a WPA to allocate or safeguard land for waste management purposes is compromised by the classification of the use, given that certain types of waste management operation are now considered to fall within the general industrial Use Class B2. In practice, a WPA would find it impossible to resist a proposal for another type of B2 use on a site that is allocated for waste management purposes, given that the uses could be interpreted as falling within the same Use Class.

**W2: If no, suggest alternative criteria below;**

Although we are not advocating an alternative strategic approach, the RSS should accurately reflect what WPAs can do, and set realistic goals, which should be subject to the caveats set out in the response to Question W1 above

**W3 Should the basis on which WPAs identify sites be based on safeguarding and expanding suitable sites with an existing waste management use, provided that they are capable of meeting a range of locally based environmental and amenity criteria and have good transport connections?**

Yes.



We agree that the starting point for any strategy for waste should be to consider the extent to which existing waste management facilities can meet future requirements. We therefore also agree that existing facilities should be safeguarded and protected against proposals for other uses, where they are well-located and do not give rise to environmental or amenity problems. However, not all sites are well-located, so the RSS should also support the relocation of poorly-located facilities to sites that have better accessibility and/ or less impact on amenity or the environment. Where there is scope for existing facilities to be expanded, this should be encouraged in principle, subject to appropriate safeguards, and provided that this would not lead to transport, amenity or environmental problems. As the RSS is part of the development plan for all of the local planning authorities in the region, there is no reason why it should not include a general policy safeguarding existing waste management facilities of regional or sub-regional significance where the re-use of sites is subject to planning control, which can be applied by WPAs when determining planning applications affecting such facilities. However, such a policy could only apply to redevelopment schemes and changes of use that fall within the scope of planning control. The extent to which existing facilities can be safeguarded may in some cases be compromised by the definition of the use. For example, a waste management use falling within Class B2 may lawfully change to another B2 use without requiring permission, unless it is subject to conditions preventing such a change of use (see also response to Questions W1 c), W9 and PEL2).

**W4: Should the basis on which WPAs identify new sites be based on the following criteria;**

- **Good accessibility from existing urban areas or major planned development; and**
- **Good transport connections including, where possible, rail or water, and**
- **Compatible land uses, namely,**
  - **Active mineral working sites; or**
  - **Previous or existing industrial land use; or**
  - **Contaminated or derelict land; or**
  - **Land within or adjoining a sewage treatment works; or**
  - **Redundant farm buildings and their cartilage; and**
  - **Be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections?**

Yes - we agree with the criteria, but they could be better expressed.

We agree with the general principle that the RSS should provide guidance on the criteria to be used for identifying sites or locations for the development of new waste management facilities. However, as with the safeguarding of sites, we do not see this as being exclusively the responsibility of WPAs. The RSS is part of the development plan for all of the WPAs in the region, and should therefore include policies that are worded in such a way that they can be applied through the development control process, as well as guidance on what WPAs should include in DPDs. The criteria above could also be better worded. For example, the final bullet point repeats the point made in the preamble about the need for good transport connections. The policy/ criteria would be better worded as follows:

*Waste management facilities should have good accessibility from existing urban areas or major planned development, and good transport connections including, where possible, rail or water. They should be located in areas that already include compatible land uses, such as:*

- *Active mineral working sites; or*

- *Previous or existing industrial land uses; or*
- *Contaminated or derelict land; or*
- *Land within or adjoining a sewage treatment works; or*
- *Redundant farm buildings and their curtilage; and*
- *Other locations, subject to compliance with local environmental and amenity criteria.*

*WPAs should have regard to the above criteria when identifying locations and/ or allocating sites for waste management development in DPDs.*

**W5: If no, suggest alternative criteria below;**

*We have no objection to the criteria, but have concerns about the way that they are worded and expressed (see response to Question W4 above).*

**W6: Should waste management facilities be permitted on open land, including land within the Green Belt, where it is**

- **consistent with the proximity principle (communities taking responsibility for their own waste); and**
- **where there are no alternative sites; and**
- **where it would not cause demonstrable harm to the objectives of the designation?**

*Yes, subject to the criteria above and the caveats below.*

*We agree that provision on open land cannot be ruled out. Indeed, some waste management facilities (e.g. on-farm open windrow composting) can only be located on open land. However, it is not just a question of compliance with Green Belt policy. In some locations – whether or not they are in the Green Belt - any built development would be intrusive or damaging, and we do not accept that in such circumstances, waste management should be treated as a “special case.” The RSS should make it clear that waste management development will not be encouraged where it is likely to have unacceptable impacts on environmentally sensitive areas such as high quality landscapes and areas having biodiversity value. The RSS should also make it clear that where waste management development is permitted on open land, facilities will be expected to be of high quality design, and to include appropriate landscaping and screening if necessary*

## **Municipal Waste**

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 year except when there is a ‘one off’ increase when authorities introduce ‘green waste’ collections. 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. 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.

### Waste Tonnes to 2026 based on the Housing Options

<b>Housing Option One</b>										
	2005/6		2010/1		2015/6		2020/1		2025/6	
Municipal Waste Management	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual
Birmingham	464,000	90,000	493,000	94,000	503,000	90,000	505,000	94,000	507,000	98,000
Coventry	140,000	34,000	142,000	45,000	146,000	45,000	148,000	48,000	149,000	51,000
Dudley	116,000	33,000	133,000	27,000	136,000	27,000	137,000	29,000	139,000	31,000
Sandwell	61,000	97,000	87,000	81,000	107,000	62,000	114,000	55,000	115,000	56,000
Solihull	76,000	17,000	82,000	17,000	85,000	17,000	85,000	19,000	86,000	20,000
Walsall	47,000	111,000	81,000	89,000	103,000	71,000	112,000	65,000	116,000	66,000
Wolverhampton	129,000	27,000	141,000	25,000	144,000	25,000	146,000	28,000	147,000	30,000
Met Area Sub-Total	1,033,000	409,000	1,159,000	378,000	1,224,000	337,000	1,247,000	338,000	1,259,000	352,000
Herefordshire	24,000	67,000	41,000	58,000	56,000	46,000	62,000	43,000	65,000	43,000
Shropshire	54,000	132,000	91,000	109,000	116,000	91,000	131,000	82,000	136,000	84,000
Staffordshire & Stoke-on-Trent	370,000	282,000	417,000	279,000	490,000	218,000	515,000	205,000	525,000	207,000
Telford & Wrekin	22,000	81,000	53,000	61,000	70,000	51,000	80,000	48,000	85,000	50,000
Warwickshire	81,000	230,000	156,000	179,000	201,000	143,000	221,000	132,000	228,000	135,000
Worcestershire	72,000	237,000	144,000	187,000	189,000	150,000	209,000	137,000	215,000	139,000
Shire Area Sub-Total	623,000	1,029,000	902,000	873,000	1,122,000	699,000	1,218,000	647,000	1,254,000	658,000
WEST MIDLANDS REGION	1,655,000	1,441,000	2,061,000	1,281,000	2,347,000	1,086,000	2,467,000	1,061,000	2,512,000	1,113,000

<b>Housing Option Two</b>										
	2005/6		2010/1		2015/6		2020/1		2025/6	
Municipal Waste Management	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual
Birmingham	464,000	92,000	495,000	99,000	507,000	98,000	511,000	105,000	514,000	112,000
Coventry	143,000	35,000	145,000	52,000	152,000	56,000	155,000	63,000	159,000	70,000
Dudley	116,000	33,000	133,000	27,000	136,000	27,000	137,000	29,000	139,000	31,000
Sandwell	61,000	97,000	87,000	81,000	107,000	62,000	114,000	55,000	115,000	56,000
Solihull	76,000	17,000	83,000	18,000	85,000	18,000	86,000	20,000	87,000	22,000
Walsall	47,000	111,000	81,000	89,000	103,000	71,000	112,000	65,000	116,000	66,000
Wolverhampton	129,000	27,000	141,000	25,000	144,000	25,000	146,000	28,000	147,000	30,000
Met Area Sub-Total	1,036,000	412,000	1,165,000	391,000	1,234,000	357,000	1,261,000	365,000	1,277,000	387,000
Herefordshire	24,000	68,000	42,000	58,000	58,000	47,000	65,000	44,000	68,000	45,000
Shropshire	54,000	132,000	92,000	110,000	118,000	91,000	134,000	83,000	140,000	85,000
Staffordshire & Stoke-on-Trent	371,000	285,000	420,000	286,000	501,000	223,000	530,000	213,000	544,000	217,000
Telford & Wrekin	22,000	83,000	57,000	63,000	77,000	53,000	89,000	51,000	97,000	53,000
Warwickshire	82,000	232,000	161,000	180,000	208,000	146,000	231,000	136,000	240,000	139,000
Worcestershire	72,000	240,000	149,000	189,000	197,000	152,000	220,000	140,000	229,000	143,000
Shire Area Sub-Total	625,000	1,040,000	921,000	886,000	1,159,000	712,000	1,269,000	667,000	1,318,000	682,000
WEST MIDLANDS REGION	1,661,000	1,454,000	2,085,000	1,313,000	2,394,000	1,134,000	2,531,000	1,131,000	2,595,000	1,208,000

<b>Housing Option Three</b>											
	2005/6		2010/1		2015/6		2020/1		2025/6		
Municipal Waste Management	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual	
Birmingham	465,000	95,000	498,000	105,000	512,000	107,000	517,000	117,000	522,000	128,000	
Coventry	143,000	35,000	145,000	52,000	152,000	56,000	155,000	63,000	159,000	70,000	
Dudley	116,000	33,000	133,000	27,000	137,000	28,000	138,000	30,000	139,000	33,000	
Sandwell	61,000	97,000	87,000	81,000	108,000	62,000	116,000	56,000	117,000	56,000	
Solihull	76,000	18,000	83,000	19,000	86,000	20,000	87,000	23,000	89,000	25,000	
Walsall	47,000	112,000	82,000	89,000	104,000	71,000	114,000	66,000	118,000	67,000	
Wolverhampton	129,000	27,000	141,000	26,000	145,000	27,000	146,000	30,000	148,000	32,000	
Met Area Sub-Total	1,037,000	417,000	1,169,000	399,000	1,244,000	371,000	1,273,000	385,000	1,292,000	411,000	
Herefordshire	24,000	68,000	42,000	58,000	58,000	47,000	65,000	44,000	68,000	45,000	
Shropshire	54,000	132,000	92,000	110,000	118,000	91,000	134,000	83,000	140,000	85,000	
Staffordshire & Stoke-on-Trent	372,000	286,000	421,000	289,000	507,000	225,000	537,000	215,000	554,000	220,000	
Borough of Telford & Wrekin	22,000	83,000	57,000	63,000	77,000	53,000	89,000	51,000	97,000	53,000	
Warwickshire	82,000	233,000	165,000	182,000	216,000	148,000	242,000	139,000	254,000	143,000	
Worcestershire	72,000	242,000	154,000	190,000	205,000	154,000	230,000	144,000	242,000	147,000	
Shire Area Sub-Total	626,000	1,044,000	931,000	892,000	1,181,000	718,000	1,297,000	676,000	1,355,000	693,000	
WEST MIDLANDS REGION	1,663,000	1,457,000	2,101,000	1,314,000	2,424,000	1,132,000	2,573,000	1,131,000	2,648,000	1,209,000	

The tables above show the amount of household waste arising for the three Options set out in the **housing** section. They are based on a growth rate for waste of 1% per year from 2006 until 2011, and no growth from 2011, other than that generated by new households. The Preferred Option is likely to be a different level to one of these three Options, your comments will be used to guide the level of housing development in the Region, please add your comments to the Housing section.

**W7: Do you have any comments on these tables?** (Apportionment of waste to be managed in each Waste Planning Authority depending on new housing and household formation)

The Council supports Housing Option 2 (see response to Question H1), and therefore the apportionments set out in the first table on page 60. It should be possible for WPAs to monitor performance against these targets, as the amounts of municipal waste managed using different methods is already a LDF Core Output Indicator, and the data is held by the waste disposal authorities who are responsible for managing the waste. However, basing the proposed apportionments on the Housing options means that there is actually very little difference between the tonnages of waste requiring management under each of the options. There is a risk that RPB could be criticised for not identifying a reasonable choice of options. For example, a set of options could have been developed based on different rates of diversion away from landfill, as with the options for C & I waste (see Question W8 below). Whilst we would not necessarily support a higher rate of diversion than that suggested for Housing Option Two, such options should perhaps have been tested.

### **Commercial and Industrial Waste**

The combined amount of Commercial and Industrial Waste in the Region has not changed significantly in recent years, however the amount of industrial waste has decreased and commercial waste is growing, reflecting the growth in the service sector and this has changed the type of waste, and the way it can be managed.

Different types of waste management need different amounts of land and need to be located in different areas. For example, most modern waste management facilities could be put on a general industrial estate without causing a nuisance therefore being close to where the waste is being generated. However, diverting biodegradable waste from landfill could mean open windrow composting, in which case it needs to be 200 metres from sensitive places and could not be on a general industrial estate, or it could mean 'in-vessel' composting, if it contains food waste, in which case it could be on an industrial estate.

Re-use and recycling are at the top of the waste hierarchy. If waste can be used as a resource rather than having to use more raw materials and energy to make metals and plastics this would be a good example of sustainable development and would help to mitigate the effects of climate change. Resource Recovery Parks where waste can be recycled and recovered in one building and used to manufacture new goods in the adjoining building are a perfect example of this principle. The sites do not need to be large and could be distributed across each WPA to encourage local enterprise and initiative.

**W8: Should the WMRSS policy for Commercial and Industrial Waste be based on:**

- a) the current levels of diversion of Commercial and Industrial Waste arisings from landfill in Waste Strategy 2000? (Low)
- b) policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy? (Medium)

- c) policies that reflects a higher rate of diversion, twice that of the draft Revisions to the England's Waste Strategy, to anticipate a higher level of diversion arising from the increase in Landfill Tax and producer responsibility obligations? (High)

The table below illustrates W8, (to 2025 to reflect the England's Waste Strategy 2000).

Landfilling as a % of total Commercial and Industrial waste	2002	2010	2015	2020	2025	Please tick
A	42%	41%	40%	39%	39%	
B	42%	37%	36%	35%	35%	
C	42%	35%	30%	25%	25%	

The different diversion rates will result in different amounts of Commercial and Industrial Waste going to landfill. The following tables show the landfill capacity that will be required, if W7 Options A, B and C, above come about.

**W8: Should the WMRSS policy for Commercial and Industrial Waste be based on:**

Criteria	Yes	No	Comment
a – low) the current levels of diversion of Commercial and Industrial Waste arisings from landfill in Waste Strategy 2000?		✓	
b – medium) policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy?	✓		Any targets set in the RSS should aim to comply with national policy guidance. Although the targets proposed in the national waste strategy review consultation document are hardly ambitious, they are probably realistic, given the fact that WPAs have limited influence over the ways in which C & I waste is managed.
c – high) policies that reflects a higher rate of diversion, twice that of the draft Revisions to England's Waste Strategy, to anticipate a higher level of diversion arising from the increase in Landfill Tax and producer responsibility obligations?		✓	

Whatever targets are set in the RSS, without better information, WPAs will not be able to monitor performance with confidence, since nobody "owns" either the problem or the data. We do not anticipate that we will ever have accurate, up-to-date information on C & I waste at a local level. Even if we are able to obtain information on the throughput of licensed sites from the Environment Agency on a more regular basis in the future, it will only ever cover a proportion of the tonnages of C & I waste managed. We will never know how much waste is managed through processes that are exempt from licensing.

## W8: Commercial and Industrial Options

Low Diversion (Continuation of Waste Strategy 2000)										
	2005/6		2010/1		2015/6		2020/1		2025/6	
I&C Waste	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual
Birmingham	613,060	443,940	634,000	440,000	745,000	497,000	969,000	619,000	969,000	619,000
Coventry	215,760	156,240	223,000	155,000	262,000	175,000	341,000	218,000	341,000	218,000
Dudley	219,240	158,760	227,000	157,000	266,000	178,000	346,000	222,000	346,000	222,000
Sandwell	323,640	234,360	334,000	232,000	392,000	262,000	511,000	326,000	511,000	326,000
Solihull	98,600	71,400	101,000	70,000	119,000	79,000	154,000	99,000	154,000	99,000
Walsall	220,400	159,600	228,000	158,000	268,000	179,000	348,000	223,000	348,000	223,000
Wolverhampton	180,380	130,620	186,000	130,000	219,000	146,000	285,000	182,000	285,000	182,000
<b>Met Area Total</b>	<b>1,871,080</b>	<b>1,354,920</b>	<b>1,933,000</b>	<b>1,342,000</b>	<b>2,271,000</b>	<b>1,516,000</b>	<b>2,954,000</b>	<b>1,889,000</b>	<b>2,954,000</b>	<b>1,889,000</b>
Shropshire	211,120	152,880	218,000	152,000	257,000	171,000	334,000	213,000	334,000	213,000
Telford & Wrekin	198,360	143,640	205,000	142,000	241,000	161,000	314,000	200,000	314,000	200,000
Staffordshire & Stoke-on-Trent	867,680	628,320	896,000	622,000	1,053,000	702,000	1,369,000	876,000	1,369,000	876,000
Warwickshire	353,220	255,780	365,000	253,000	429,000	286,000	558,000	356,000	558,000	356,000
Worcestershire	441,380	319,620	457,000	317,000	537,000	358,000	698,000	446,000	698,000	446,000
Herefordshire	97,440	70,560	100,000	69,000	118,000	78,000	153,000	97,000	153,000	97,000
<b>Shire &amp; Unitary Authorities Total</b>	<b>2,169,200</b>	<b>1,570,800</b>	<b>2,241,000</b>	<b>1,555,000</b>	<b>2,635,000</b>	<b>1,756,000</b>	<b>3,426,000</b>	<b>2,188,000</b>	<b>3,426,000</b>	<b>2,188,000</b>
<b>West Midlands Region Total</b>	<b>4,040,280</b>	<b>2,925,720</b>	<b>4,174,000</b>	<b>2,897,000</b>	<b>4,906,000</b>	<b>3,272,000</b>	<b>6,380,000</b>	<b>4,077,000</b>	<b>6,380,000</b>	<b>4,077,000</b>

Medium Diversion (proposals in the review of England's Waste Strategy)										
	2005/6		2010/1		2015/6		2020/1		2025/6	
I&C Waste	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual
Birmingham	613,060	443,940	677,000	397,000	795,000	447,000	1,032,000	556,000	1,032,000	556,000
Coventry	215,760	156,240	238,000	140,000	280,000	157,000	363,000	196,000	363,000	196,000
Dudley	219,240	158,760	242,000	142,000	284,000	160,000	369,000	199,000	369,000	199,000
Sandwell	323,640	234,360	357,000	209,000	419,000	235,000	544,000	293,000	544,000	293,000
Solihull	98,600	71,400	108,000	63,000	127,000	71,000	164,000	89,000	164,000	89,000
Walsall	220,400	159,600	243,000	143,000	286,000	161,000	371,000	200,000	371,000	200,000
Wolverhampton	180,380	130,620	194,000	122,000	202,000	163,000	237,000	230,000	304,000	163,000
<b>Met Area Total</b>	<b>1,871,080</b>	<b>1,354,920</b>	<b>2,059,000</b>	<b>1,216,000</b>	<b>2,393,000</b>	<b>1,394,000</b>	<b>3,080,000</b>	<b>1,763,000</b>	<b>3,147,000</b>	<b>1,696,000</b>
Shropshire	211,120	152,880	233,000	137,000	274,000	154,000	356,000	191,000	356,000	191,000
Telford & Wrekin	198,360	143,640	219,000	128,000	257,000	145,000	334,000	180,000	334,000	180,000
Staffordshire & Stoke-on-Trent	867,680	628,320	956,000	562,000	1,123,000	632,000	1,459,000	786,000	1,459,000	786,000
Warwickshire	353,220	255,780	389,000	229,000	458,000	257,000	594,000	320,000	594,000	320,000

Worcestershire	441,380	319,620	488,000	286,000	573,000	322,000	744,000	400,000	744,000	400,000
Herefordshire	97,440	70,560	106,000	63,000	125,000	71,000	163,000	87,000	163,000	87,000
<b>Shire &amp; Unitary Authorities Total</b>	<b>2,169,200</b>	<b>1,570,800</b>	<b>2,391,000</b>	<b>1,405,000</b>	<b>2,810,000</b>	<b>1,581,000</b>	<b>3,650,000</b>	<b>1,964,000</b>	<b>3,650,000</b>	<b>1,964,000</b>
<b>West Midlands Region Total</b>	<b>4,040,280</b>	<b>2,925,720</b>	<b>4,450,000</b>	<b>2,621,000</b>	<b>5,203,000</b>	<b>2,975,000</b>	<b>6,730,000</b>	<b>3,727,000</b>	<b>6,797,000</b>	<b>3,660,000</b>

<b>High Diversion</b>										
	2005/6		2010/1		2015/6		2020/1		2025/6	
	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual	Diversion	Residual
I&C Waste										
Birmingham	613,060	443,940	698,000	376,000	869,000	373,000	1,191,000	397,000	1,191,000	397,000
Coventry	215,760	156,240	246,000	132,000	306,000	131,000	419,000	140,000	419,000	140,000
Dudley	219,240	158,760	250,000	134,000	311,000	133,000	426,000	142,000	426,000	142,000
Sandwell	323,640	234,360	368,000	198,000	458,000	196,000	628,000	209,000	628,000	209,000
Solihull	98,600	71,400	111,000	60,000	139,000	59,000	190,000	63,000	190,000	63,000
Walsall	220,400	159,600	251,000	135,000	313,000	134,000	428,000	143,000	428,000	143,000
Wolverhampton	180,380	130,620	205,000	111,000	256,000	109,000	350,000	117,000	350,000	117,000
<b>Met Area Total</b>	<b>1,871,080</b>	<b>1,354,920</b>	<b>2,129,000</b>	<b>1,146,000</b>	<b>2,652,000</b>	<b>1,135,000</b>	<b>3,632,000</b>	<b>1,211,000</b>	<b>3,632,000</b>	<b>1,211,000</b>
Shropshire	211,120	152,880	241,000	129,000	300,000	128,000	410,000	137,000	410,000	137,000
Telford & Wrekin	198,360	143,640	226,000	121,000	281,000	121,000	386,000	128,000	386,000	128,000
Staffordshire & Stoke-on-Trent	867,680	628,320	987,000	531,000	1,229,000	526,000	1,684,000	561,000	1,684,000	561,000
Warwickshire	353,220	255,780	402,000	216,000	640,000	75,000	686,000	228,000	686,000	228,000
Worcestershire	441,380	319,620	503,000	271,000	627,000	268,000	858,000	286,000	858,000	286,000
Herefordshire	97,440	70,560	110,000	59,000	137,000	59,000	188,000	62,000	188,000	62,000
<b>Shire &amp; Unitary Authorities Total</b>	<b>2,169,200</b>	<b>1,570,800</b>	<b>2,469,000</b>	<b>1,327,000</b>	<b>3,214,000</b>	<b>1,177,000</b>	<b>4,212,000</b>	<b>1,402,000</b>	<b>4,212,000</b>	<b>1,402,000</b>
<b>West Midlands Region Total</b>	<b>4,040,280</b>	<b>2,925,720</b>	<b>4,598,000</b>	<b>2,473,000</b>	<b>5,866,000</b>	<b>2,312,000</b>	<b>7,844,000</b>	<b>2,613,000</b>	<b>7,844,000</b>	<b>2,613,000</b>



## Hazardous Waste

This Region, although traditionally a relatively more industrialised region than elsewhere, surprisingly does not generate proportionately more Hazardous Waste than other Regions. The Region produced 665,000 tonnes of Hazardous Waste in 2003 and is a net importer, treating more than it generates.

There are various generic types of Hazardous Waste which require to be managed in different ways. There are only two sites in the UK which treat highly volatile liquid wastes and there has been no indication from national Government that there is a need for a new facility of national importance in this Region, or elsewhere, to manage this waste.

Since the change in name, from Special Waste, and the change in definition of Hazardous Waste the construction and demolition sector has been much more careful about the categorisation of which wastes on a site are hazardous, and which are not. As a consequence the quantity of Hazardous Waste arising from construction and demolition projects has reduced significantly and more contaminated soils are being treated 'in situ' rather than being removed from site as waste. There has also been a reduction in the number of landfill sites accepting Hazardous Waste, and because of the increasing costs of disposal and transport, alternative methods of managing Hazardous Waste have been developed, substantially reducing arisings, and greater care is being taken by the industry in categorising waste as hazardous.

Most Hazardous Waste in the Region arises in the MUAs, there are two major facilities reprocessing Hazardous Waste in the Black Country. The residues from these processes is further treated but a large proportion is landfilled. On the basis of current information these plants are well placed to manage the Region's Hazardous Waste and they could be expanded, or another facility could be constructed if a third player wanted to enter the market. There is however very limited licensed Hazardous Waste Landfill capacity in the Region.

It has not been possible to estimate a figure for the facilities that will be required to manage Hazardous Waste as the industry is still adjusting to the changes in regulation. Without information on tonnages, discussions are taking place with the Environment Agency and DEFRA to establish that adequate and safe provision will be made for Hazardous Waste arising within the Region. On the evidence that the total quantities of waste classified as hazardous has significantly reduced, and that the Region is a net importer of Hazardous Waste for treatment, it is not considered necessary to make any specific provision for new sites to manage Hazardous Waste but the situation will be monitored closely.

**W9: Should the WMRSS include a policy which requires Waste Development Frameworks to safeguard existing sites for the treatment and management of Hazardous Waste?**

Yes, where they are well-located and do not give rise to environmental or amenity problems.

The question is phrased as though it does not apply to unitary authorities! Walsall is a unitary authority and therefore has a Local Development Framework, not a Waste Development Framework. We agree with the general principle that wherever possible, it is better to consolidate and expand existing, well-located sites for the treatment of hazardous waste, than to develop new ones on new sites. Where there is scope for existing facilities to be expanded, this should be encouraged in principle, subject to appropriate safeguards, and provided that this would not lead to transport, amenity or environmental problems. However, not all sites are well-located, so the RSS should also support the relocation of poorly-located

facilities to sites that have better accessibility and/ or less impact on amenity or the environment. As the RSS is part of the development plan for all of the local planning authorities within the region, there is no reason why it should not include a general policy on this as well as guidance on what should be included in DPDs (see also response to Question W3 above and response to Question PEL2).

**W10: If yes, should WMRSS policy state that Waste Development Frameworks in the MUAs give specific priority to identifying new sites for facilities, to store, treat, and remediate Hazardous Waste, including contaminated soils and demolition waste?**

No.

There are no Waste Development Frameworks covering the Major Urban Areas - unitary authorities prepare Local Development Frameworks. In accordance with PPS12, unitary authorities such as Walsall are expected to maintain Local Development Frameworks, and to include policies on waste in relevant DPDs, including their Core Strategy. There is no evidence of any pressing need for new sites for the management and treatment of hazardous waste within the MUAs. Most of the hazardous waste management and treatment facilities that currently exist within the region are within the MUAs. Whilst it is acknowledged that hazardous waste data is not perfect and is somewhat out-of-date, the latest information available suggests that Walsall is a net importer of hazardous waste for treatment and management, and that only a small proportion of the hazardous waste managed within Walsall originates from within the Borough (see Environment Agency's Hazardous Waste Interrogator data from 2003 <http://www.environment-agency.gov.uk>).

**W11: Should WMRSS policy state that Waste Development Frameworks for the non MUAs, identify new sites for the disposal of Hazardous Waste, including where necessary the encouraging the creation of protective cells in landfills for stable Hazardous Waste?**

No, at least not in areas that are close to where people live or where it is likely to cause environmental problems.

The question is phrased as though it does not apply to unitary authorities! Unitary authorities prepare Local Development Frameworks, not Waste Development Frameworks. It is acknowledged that there are currently no landfill sites anywhere within the region that will accept hazardous waste, and that consequently this waste has to travel significant distances outside the region for disposal. If there is considered to be a pressing need for such a facility within the region, it will only be provided if the RSS identifies a broad location for it, which will then commit a particular WPA or group of WPAs to bring it forward. However, the difficulties of doing this are acknowledged, since such a proposal is likely to be highly controversial, politically unpopular, and no authority is likely to volunteer to provide it. As a general principle, we do not feel that the RSS should support the provision of hazardous waste disposal facilities anywhere in the region that are close to where people live, or that are likely to cause environmental problems, particularly with regard to impact on water supply and biodiversity. If the RSS seeks to support the provision of hazardous waste disposal facilities within the region, this should be subject to strict criteria relating to environmental impact.

### **Construction and Demolition Waste (C&D)**

WMRSS policies focus development in the MUAs and by definition these areas are already developed and in the majority of cases development will involve demolition of existing buildings, and in some cases the ground stabilised and decontaminated, depending on the previous use, before the sites can be redeveloped.

In order to meet housing Options Two and Three more land will be required for residential development. In addition to brownfield sites this will include greenfield sites, due to urban capacity. The quantity of C&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.

It takes about 50 tonnes of aggregate to build a new house, in this Region most of that aggregate has to be transported up to 50 miles to the MUAs where the growth is proposed. If a third of that demand can be provided by recycling material from existing structures which are demolished there will be a significant saving to the environment in terms of CO<sub>2</sub> emissions from transporting the material and in terms of the impact on the countryside from reducing the scale of quarrying to extract primary aggregate.

The management of C&D Waste can either take place on-site or off-site. The decision on which course of action to follow is usually made on the perceived time that it will take to process the material on-site and the cost. If the material is managed on site there are potential consequences in terms of noise, dust and odour from the activities. If the material is taken off-site there is the potential problem of intensive HGV traffic movements on roads which may be unsuited to such movements as well as potential problems in where the material is taken.

If developers adhere to 'considerate construction' practices, the recycling of demolished structures which takes place on the demolition site need not cause nuisance to adjoining occupiers. In calculating the amount of employment land that will be required in the future, and how much existing employment land can be redeveloped for housing the need for recycling sites, and urban quarries should be taken into account. Urban Quarries are modern sites for recycling C&D waste for use as secondary aggregates with very little material going to landfill and which can be located in the built up area without causing a visual or environmental nuisance.

**W12: Should the WMRSS encourage greater recycling of C&D Waste through:**

- a) maximising 'on-site' recycling; and
- b) promoting 'urban quarries' in the MUAs where material from a variety of sites can be recycled to a high standard?

Yes.

We agree that the RSS should support greater recycling of C & D waste in principle. Recent research by WRAP ("The sustainable use of resources for the production of aggregates in England," October 2006 [http://www.aggregain.org.uk/templates/temp\\_agg\\_publication\\_details.rm?id=2298&publication=3337](http://www.aggregain.org.uk/templates/temp_agg_publication_details.rm?id=2298&publication=3337)) suggests that increased amounts of recyclable C & D waste are now entering the market in the West Midlands Metropolitan area, and that the market is likely to grow and diversify in the future. However, information on C & D waste is still deficient, and without better data it will be difficult to predict and plan for future needs. Although recycling is acknowledged to be a more sustainable method of managing C & D waste, one unfortunate consequence of this is that there is now less inert waste available for the restoration of former mineral workings. If other materials are not permitted to be used as fill, restoration could take much longer to achieve than is desirable (see also response to Question W14

## Landfill

Depending on answers to W1 - Whether each WPA should provide sufficient facilities to manage the waste arising within its own area and the Options for Municipal Waste and for Commercial and Industrial Waste W2 – W8 there will need to be different provision made for additional landfill capacity, or more waste management facilities. The distribution of landfill capacity is uneven because it generally involves the restoration of former mineral working. In addition to that capacity which is 'licensed' or 'permitted' by the Environment Agency, there is landfill capacity in this Region which has planning permission but where the owners/operators have not sought to obtain a Licence.

This Region has a relatively good supply of landfill capacity compared with other regions as a result of the geology and the scale of mineral activity. There is also a good prospect of more capacity coming forward as existing marl/clay sites are worked out and they start to be restored in accordance with their planning permissions. In the Region there are a total of 69 permitted sites; 13 in the West Midlands conurbation with a capacity of just over 9 million cubic metres, and 54 in the surrounding areas with a capacity of nearly 70 million cubic metres. The majority of the capacity is in Warwickshire and Staffordshire with significantly less in Worcestershire, virtually none in Shropshire and none at all in Herefordshire. Stoke-on-Trent and Telford have, relative to their size, significant capacity.

Comparing the different scenarios for both Municipal and for Commercial and Industrial Waste the existing permitted landfill capacity should meet the needs of the Region until 2017 in the worst case and possibly until 2020 in the best case. Over and above this licensed capacity there are sites which have planning permission and which do not yet have a Permit or Licence.

WMRSS Policy WD3C expresses a presumption against granting planning permission for new landfill sites unless there 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 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.

**W13: Should the WMRSS policy state that Waste Development Frameworks restrict the granting of planning permission for new sites for landfill to proposals which are necessary to restore despoiled or degraded land, including mineral workings, or which are otherwise necessary to meet specific local circumstances?**

Yes.

The question is phrased as though it does not apply to unitary authorities! Walsall is a unitary authority and therefore has a Local Development Framework, not a Waste Development Framework. Mineral workings have a significant long-term impact on the environment and landscape. We therefore support the general principle that once mineral workings cease they should be restored in as short a timescale as possible. Many existing mineral permissions already include a commitment towards restoration through landfill. Where this is the case, the depositing of waste within these sites is essential to enable restoration to take place in accordance with the permission. We therefore feel that the RSS should support the principle of restoration by landfill where the WPA considers it to be an appropriate method of restoration, and where it is consistent with existing permissions.

**W14: Should the WMRSS only support the allocation of new landfill sites in Waste Development Frameworks where they are supported by evidence of the depletion of existing landfill capacity and a shortage of capacity in the plan period following a study of the existing sites with planning permission for landfill but which do not have a waste management license or PPC permit from the Environment Agency?**

No.

The question is phrased as though it does not apply to unitary authorities! Walsall is a unitary authority and therefore has a Local Development Framework, not a Waste Development Framework. In practice, the demand for landfill capacity will not necessarily coincide with the supply of suitable landfill voids in any given area, and there are only a limited number of voids suitable for landfill within the region. Unfortunately, it is the Environment Agency, not the RPB or the WPAs, that dictates where new landfill capacity will be provided, for it is the Agency that issues the permits to the operators. A WPA can allocate as many landfill sites as it likes, but none of them can be implemented without a permit from the Environment Agency. It is now becoming increasingly difficult for landfill sites to obtain a permit, which raises questions about how such sites can be effectively restored and how long this is likely to take. In reality, it looks as though the RSS will only be able to address the regional requirement for waste disposal capacity if it supports the allocation of new landfill capacity anywhere within the region where there are suitable voids (i.e. where the Environment Agency will issue a permit).

### **Agricultural Waste**

The Environment Agency estimates that Agricultural Waste in the Region produced 5.9 million tonnes in 2003, a decrease of around 13% between 1998 and 2003.

About 97% of this was manure, slurry and straw. There were also 335,000 tonnes of other agricultural wastes, including silage effluent & milk; 68,000 tonnes was difficult and chemical waste; apart from slurries, there were some 70,000 tonnes of liquid waste, mainly silage effluent, pesticide washings, sheep dip and oil from vehicles and machinery. The Region also produced more than 9,000 tonnes of agricultural plastics.

Agricultural Waste has recently become a 'controlled waste' and the ability of farmers to dispose of waste on their land, other than the manure, slurry and straw, has been greatly reduced. Because agricultural holdings are by their very nature dispersed they are often a long way from waste management facilities and transfer stations. It is a commercial waste, not a household waste, and therefore local authorities are not obliged to provide facilities for the collection or management of agricultural waste but they may do so.

From the information available the total quantity of difficult wastes arising from agriculture not high in quantity but pose problems in volume terms because materials such as plastic sheeting, which is light in weight, and drums needs to be managed with care because of possible contamination with pesticides.

**W15: Should the WMRSS include a policy which requires relevant WDFs outside the MUAs to identify sites for the treatment and management of Agricultural Waste based on the premise that:**

- **agricultural undertakings adopt sustainable waste management practices with regard to waste arisings and best agricultural practice in relation to any wastes treated or disposed of on a farm: and**
- **opportunities for necessary additional sustainable waste management capacity in rural areas for waste recovery or recycling should be based on:**

- **effective protection of amenity and the environment; and**
- **the proposed activity is appropriate to the area proposed?**

Yes, but any such requirement should be subject to criteria such as those set out above

This has never been a significant issue for Walsall, although a significant part of the Borough is in fact agricultural land outside the MUA, but we are aware that the treatment, management and disposal of agricultural waste have sometimes given rise to problems in adjacent County areas. We therefore agree that sites should only be identified for the treatment and management of agricultural waste in DPDs where they are subject to criteria such as those set out above.

## **Managing Waste in New Development**

It is Government policy to 'ensure the design and layout of new development supports sustainable waste management'. This has implications for all forms of new development. In respect to the design of new developments, Section 54 of the Clean Neighbourhoods and Environment Act provides powers for regulations to be made to require developers and construction and demolition projects to prepare Site Waste Management Plans (SWMP). This Section of the Act has not yet been implemented, but would require developers to prepare and submit plans which set out the arrangements for managing and disposing of waste created in the course of development.

The concept of 'Resource Efficiency' requires careful consideration of both the consumption of minerals and the generation and management of waste materials. Urban Renaissance, which encourages more development in the MUAs, provides an opportunity to support greater resource efficiency by capturing the resources in construction and demolition waste through recycling. As well as reducing the need to quarry natural materials, such an approach would help to reduce the transport impacts of moving both minerals and waste between the MUAs and surrounding areas. A requirement to prepare SWMPs would help to achieve this important objective by drawing greater attention to the consumption, waste and transport of construction materials.

On 25 July 2006 the Department for Communities and Local Government launched a consultation paper on the validation of planning applications. The consultation proposes that there should be a national mandatory list of requirements for items which would need to accompany a planning application. This list could be supplemented by a list of local requirements, prepared by individual local authorities. The proposals provide that where an application does not meet the published national and local requirements, it would be considered incomplete and the Local Planning Authority (LPA) would not be required to validate it. Whilst SWMPs are not on the national mandatory of requirements proposed by the Government, they are included in a suggested list of additional information LPAs could use to create their own list of local requirements.

The RSS could include a policy which would require all Planning Authorities in the Region to include SWMPs in their list of local validation requirements for developments in excess of 10 dwellings or 1,000 sq. metres of development.

**W16: Should all Local Planning Authorities in the Region include a requirement in their local validation checklist for all Full or Reserved Matters planning applications for developments in excess of 10 dwellings or 1,000 sq. metres, or outline planning applications for sites in excess of 0.4 hectares of development to include a Site Waste Management Plan, without which they will not be registered as valid?**

No.

Whilst the RSS could legitimately include a general question about how WPAs should address the issue of managing waste in new development, in our view Question W16 goes too far. It is not the role of the RSS to dictate to local planning authorities how they should undertake validation of planning applications. Whilst we agree that Site Waste Management Plans (SWMP) should be required for planning applications that are likely to generate a significant amount of waste, this requirement needs to be addressed at a national level, not at a regional or local level, through appropriate legislation. At the present time, it is not clear whether the Government is proposing to address the SWMP requirement through the planning process or through other legislation. Consultation papers published by Defra early in 2006 suggested that the requirement may be tied to the cost of the building contract rather than to any thresholds that may be set in planning legislation, but no further proposals have been published since then. In our view it needs to be a bit of both. By linking the requirement to the cost of the contract, the Government risks penalising refurbishment and conversion schemes, which tend to cost more (due to VAT) but generate less waste than redevelopment schemes. It is also likely to be open to dispute which schemes fall within the thresholds and which do not. However, as demolition is not subject to planning control, there perhaps does need to be some other requirement linked to this. Fiscal measures such as removing the VAT on repairs (which are outside the scope of this RSS review) may also help to discourage unnecessary demolition/ waste production.

There are real problems in collecting monitoring data about the availability of waste management capacity in the region which is at the right geographic scale and accurate enough to inform strategic planning for waste. The WMRSS could include a policy which would require all Waste Planning Authorities in the Region to include a requirement in their local validation checklist for developers implementing all permissions involving the management, processing or recycling of waste to submit annual returns on the level of waste management activity.

**W17: Should all Waste Planning Authorities in the region include a requirement in their local validation checklist for all Full or Reserved Matters planning applications for waste management facilities to include information on annual throughput capacity in tonnages/ litres/ cubic metres (depending on the type of waste/facility), without which they will not be registered as valid.**

No.

Whilst the RSS could legitimately include a general question about how WPAs should address the issue of managing waste in new development, in our view Question W16 goes too far. It is not the role of the RSS to dictate to local planning authorities how they should undertake validation of planning applications. Whilst we agree that it should be a requirement to provide this information with planning applications for new waste management facilities, this requirement needs to be addressed at a national level, not at a regional or local level, through appropriate legislation. Indeed, the Government Office for the West Midlands has informed us that the Standard Application Form will address this issue. In view of this, RSS does not need to include any such requirement.

### **Design of New Development**

The Spatial Options set out alternative housing growth proposals for the Region. Waste Collection Authorities (WCAs) are already facing challenging targets to divert waste from landfill and it is important that the new houses are constructed in a way which makes it as easy as possible for householders to recycle waste. The WMRSS could contain a policy that

requires all LDDs (and through the LDDs, Supplementary Planning Guidance) to address the need to store, collect, manage and dispose of waste in a way which will move the management of waste up the 'waste hierarchy'. These policies should apply equally to redevelopment and new development on brownfield or greenfield sites, and for all forms of development; residential, commercial, industrial, retail and service.

## **Residential Development**

Good design and layout in new development can help to secure opportunities for sustainable waste management, including for kerbside collection and community recycling as well as for larger waste facilities. Participation in these schemes requires householders to be able to segregate and to store their waste separately using a number of different sized and shaped containers, which are either provided by the waste collection authority, or by themselves. Depending on the form of housing, and when it was constructed this storage space may, or may not, be available.

## **Industrial, Commercial and Retail Development**

Waste storage and collection on commercial and industrial sites can also be a challenge. It can be very unsightly if waste is not stored in appropriate containers or if the containers are left in visually prominent locations in the street scene. Open storage of waste also lead to safety and security problems. If buildings have multiple occupiers, the storage and collection of waste can also lead to problems between different tenants and difficulties in the management of sites, if not addressed positively. Good design and layout in new development can help to secure opportunities for sustainable waste management through the provision of sufficient space within dwellings and business premises for the storage of segregated waste, and for kerbside collection of municipal waste and community recycling. These detailed and local issues should be considered in Local Development Frameworks.

**W18: Should the WMRSS require all LDDs to have policies which require provision to be made in the design of all new residential and in commercial and industrial development for the segregated storage of waste and for on-site waste management to be part of the 'Design and Access Statements'?**

No.

In our view Question W18 misses the point. It would be more appropriate for the RSS to include a policy requiring such provision to be made, than for it to require WPAs to do it, or to attempt to dictate to them what they should require applicants to provide in Design and Access Statements without having considered other design and access issues. The RSS is part of the development plan for all of the authorities within the region, and could therefore legitimately include a policy requirement for all major schemes (as defined in the General Permitted Development Order) to make adequate provision for on-site waste management.

## **Economic Development Opportunities**

This Region generates about 3 million tones of Municipal Waste every year and 7.5 million tones of Commercial and Industrial Waste. The cost of managing wastes varies with the type of material, its condition, and how far away the treatment facilities and landfill sites are. Government policy is to change the economics of waste management by a variety of legislative and fiscal measures so that it is simpler and economically more attractive to recycle and re-use waste rather than dispose of it (see the landfill section).



At present the Region is one of the cheapest areas to landfill waste because of the large number of mineral sites, particularly clay quarries, which require restoration.

In the Region the waste sector of the economy will grow from about £300 m. in 2006 to about £500 m. in 2012, just as a consequence of planned increases in the Landfill Tax. The waste industry has traditionally been associated with low skill/low wage jobs, but the development of new technologies to manage and recycle waste will create many higher skilled technical opportunities to operate and maintain highly complex plant and equipment. A recent report for the Energy and Utility Skills Council, by looking at the age profile of the industry and existing skills levels, estimated that there would be a growth in the employment opportunities in this sector, [see www](#)

There will be further economic growth associated with the opportunities for research, development and manufacturing of techniques and equipment to convert the waste into resources.

**Evidence Base:** The Regional Technical Advisory Body for Waste (RTAB) commissioned four studies supporting these waste options that can be seen on [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121) . The aim of the studies was to understand the capacity and needs in the Region. In addition consultants looked at a series of scenarios for managing Commercial and Industrial Waste.

#### **Find out more:**

The draft review of England's Waste Strategy <http://www.defra.gov.uk/environment/waste/strategy/review/> sets targets for the reduction of Municipal and Commercial and Industrial Waste going to landfill. It also sets recycling and recovery targets for Municipal Waste.

Data on waste arisings and how waste was managed in the Region 1998/99 and 2002/03 can be found <http://www.environment-agency.gov.uk/subjects/waste/>

## **Transport and Accessibility**

The transport and accessibility topic areas to be reviewed are set out below. There may also be a need to examine the priorities for investment set out in Policy T12. The topics addressed in this section were suggested by the Secretary of State as needing immediate revision, the full Regional Transport Strategy is contained within the current West Midlands Regional Spatial Strategy.

The options set out below have strong links to a number of the WMRSS policies on transport. The options also have linkages to other policy areas being revised, for example PA11: The Network of Town and City Centres see page aaaa.

In a number of areas national and local policy is developing. The Metropolitan Authorities have undertaken a substantial programme of research into the impact of road user charging within Coventry, Solihull, Birmingham, and the Black Country. The findings of this research are being used to inform a debate on future policy. Similarly there is a national debate on how transport impacts on climate change are addressed. The outcome of this debate could impact upon the Preferred Option.

When considering your responses to all of the options set out below you may wish to consider the social, environmental, economic and resource impact that these options could

have.

## **Strategic Park and Ride**

**Objective:** To identify broad locations for Strategic Park and Ride sites in the Region.

### **What to think about:**

Strategic Park and Ride provides greater opportunities to develop more sustainable access across the Region. It provides car users with public transport access to strategic destinations and major centres, in and outside of the Region. There are different types of Strategic Park and Ride, some provide an alternative for hundreds of cars drivers to park outside our major centres, others such as Parkway Stations, provide access to long distance rail services e.g. Warwick to London. Two Strategic Park and Ride sites are already identified in WMRSS Policy T6 B at Brinsford and Worcester Parkway.

Strategic Park and Ride is best located where it has access to good quality public transport services (trains, trams or buses) and has good connections to the Strategic Highway Network.

Strategic Park and Ride development will have different impacts on the environment, depending on where they are located, for example they may be sited on previously developed land or greenfield sites. However, their objective is to increase the use of public transport, particularly in congested areas, as a consequence they can have a positive impact on climate change, the environment and health in the Region.

It is important to think about the broad locations in connection with the household and population growth in the Region. As our centres grow there will be greater potential for people to travel, for work, retail and leisure reasons. Strategic Park and Ride can provide a more sustainable alternative to support such growth.

The Spatial Options are concerned with Park and Ride sites of regionally strategic significance, however there are a developing network of local schemes which provide improved access to centres. These schemes are covered by WMRSS Policy T7 C and this is not being revised.

Three approaches have been considered to help identify potential broad locations, these are described further below:

- Criteria Based;
- Location; and
- Target Destinations.

### **Criteria Based**

This approach does not specify the broad locations, but allows promoters (such as Network Rail, local authorities and train operating companies) to develop proposals which adopt the criteria set out in the WMRSS. This is a 'bottom-up' approach and allows for greater policy alignment and closer working relationships between the local, regional and national transport providers.

The current WMRSS Policy T6 C requires Strategic Park and Ride locations to be considered against the following criteria:

- i) The frequency, capacity and quality of the Ride element;
- ii) The environmental and traffic impacts at the Park location;
- iii) The potential for interchange with other public transport;
- iv) The potential relief to routes into the target destination; and
- v) The implications of the Park and Ride on the railway network and other services.

**SPR1: Do you agree these are the right criteria?**

No.

**SPR2: If not what else should be considered?**

The criteria should also make reference to supporting trips into any area that may in the future fall under the influence of Demand Management, or more specifically Road User Charging.

Also, the criteria should also include reference that sites should not encourage outward migration from the Major Urban Area and not to encourage inappropriate development around strategic park and ride sites.

**Location**

Research carried out shows that there is evidence to support the principle of identifying Strategic Park and Ride locations as “Edge of Major Urban Area” or “External Town”. See [www.wmra.gov.uk/download.asp?id=121](http://www.wmra.gov.uk/download.asp?id=121) for further details. The study identifies a number of locations within these categories examples include:

Edge of Major Urban Area:

- Coleshill (already underway);
- Longbridge; and
- Quinton/M5 Junction 3.

External Town:

- Kidderminster;
- Lichfield Trent Valley;
- Shrewsbury;
- Stafford;
- Tamworth; and
- Telford.

**SPR3: Do you agree that Strategic Park and Ride locations may be categorised as “Edge of Major Urban Area” and “External Town”?**

Yes, subject to the comments below.

If such an approach were to be adopted, priority should be placed on strategic facilities that serve the Major Urban Area, to support the RSS principle of “Urban Renaissance.”

**SPR4: Are the broad locations identified above the right ones, or should others be considered?**

Yes, others should be considered.

There needs to be flexibility in this approach to enable additional sites to be added to pick up future changes within the Region. A defined list of sites is too prescriptive without the flexibility to include additional sites to support any future changes in land-use or transport. The identification of sites will also be heavily influenced by any future introduction of Road User Charging within the West Midlands and will therefore need flexibility to take account of the outcomes of current technical work on this and any changes to policy T8: Demand Management

## Target Destinations

The existing WMRSS Policy T6: Strategic Park and Ride is one of a number of policies that attempts to reduce congestion in major centres. The policy includes the concept of "Target Destinations" however, the WMRSS does not identify these places.

There are many important destinations in the Region that may be considered to be "Target Destinations". See WMRSS Policy PA11: The Network of Town and City Centres. This policy is also being revised as part of the Phase One Black Country Study. In addition there may be other major destinations that need to be considered such as the National Exhibition Centre/Birmingham International Airport area.

There are also "Target Destinations" outside of the Region, the most obvious example being London, but there may be others.

### **SPR5: Do you agree that the "Target Destinations" within the Region are the Centres identified in WMRSS Policy PA11?**

Yes, subject to the comments below.

The list of Town and City Centres within PA11 is diverse and if such an approach were adopted, some form of hierarchy or banding needs to be established to ensure that the high priority destinations such as the Major Urban Areas and Birmingham International Airport are clearly emphasised.

### **SPR6: Is London the only "Target Destination" outside the Region that should be accessed by Strategic Park and Ride or are there others?**

No.

Additional target destinations could include other Metropolitan Areas, The Channel Tunnel, key ports & harbours and strategic airports such as Heathrow.

### **SPR7: Are there opportunities for Strategic Park and Ride in the West Midlands to provide access to "Target Destinations" outside of the Region?**

Yes.

Access to national rail services could be deemed as providing a strategic link to key target destinations outside the West Midlands.

### **SPR 8: Which of the approaches do you feel would best provide the guidance needed and why?**

A criteria approach would provide the flexibility needed to take account of future changes in the region that may warrant the introduction of additional strategic park and ride sites. However, any such approach would need to take account of the possible influences from demand management and should not encourage outward migration from the MUA and should deter inappropriate development around possible strategic park and ride sites.

## Evidence Base

The West Midlands Strategic Park and Ride Strategy Phase 2 (September 2003) was undertaken on behalf of regional partners see: [www.wmra.gov.uk/download.asp?id=121](http://www.wmra.gov.uk/download.asp?id=121)

The Strategic Rail Authority's West Midlands Route Utilisation Study also addresses strategic park and ride see: [www.sra.gov.uk/pubs2/strategy\\_policy\\_planning](http://www.sra.gov.uk/pubs2/strategy_policy_planning)

## Car Parking Standards

**Objective:** To identify parking standards specific for the Region.

### What to think about

The existing WMRSS Policy T7: Car Parking Standards and Management states that all local authorities should work together, before the next review of the WMRSS, to identify:

- (i) Those town centres and heritage areas to which more restrictive standards should be applied because of their public transport accessibility, higher densities and/or sensitive character; and
- (ii) A broad indication of more restrictive maximum standards for relevant land use categories.

By working together the Region's local authorities have been able to consider areas, and land uses, that should have parking standards different to those specified in PPG13: Transport. PPG13 does not include all land uses, for example, the guidance does not help to identify parking on mixed use developments, nor does it provide parking standards for other facilities such as hospitals and airports. In considering your response it would be helpful if you considered whether standards are needed or should be determined locally based upon an assessment of need.

These parking standards options set out where and how maximum parking standards could be made more regionally specific than those set out in national guidelines.

Parking supply and availability is a very important feature of any centre. Care should be taken to avoid introducing WMRSS policies that deter investment in centres, particularly those considered to be vulnerable. WMRSS Policy PA11 sets out the strategic town and city centres across the Region. This Policy is also being revised as part of Phase One: Black Country Study.

In order to help the local authorities to co-ordinate this work, consultants were commissioned to investigate the Region's parking standards. This approach has been under-pinned by the following objectives:

- The potential to use parking standards as part of a strategy to manage demand;
- The need to make the most effective use of land available, particularly in centres;
- The need to improve the environment;
- To maintain and enhance the economic viability of town and city centres; and
- To facilitate good design.

It is important to consider how changes to this policy relate to the distribution of housing and employment land policies. These important Regional Drivers will influence the Preferred Option for parking standards.

**PS1: Does the West Midlands need to have regionally specific parking standards that are different to those set out in the national guidelines?**

No.

In the case of residential parking standards, local authorities should be free to be flexible in order to cater for future car ownership, as stated in PPS3. Providing good off-street residential parking is an essential part of maintaining of a wide range of attractive housing that is necessary both to keep well-off people in the MUAs and attract more affluent people into the MUAs.

In relation to non residential parking, the various accessibility-based approaches to establishing standards outlined in the options document would increase the complexity of the development control process and make it more difficult to implement the standards. Accessibility is a very important consideration, and standards should be developed for all transport users, not just car users, but the accessibility policy objective should not be confused with the traffic reduction one at the local level, especially as local authorities have no ultimate control over car ownership.

Moreover, car parking provision within centres needs to be improved in order to safeguard investor confidence, and therefore vitality and viability, a prime part of a strategy to achieve an urban renaissance. Cutting back car parking in centres, on the assumption that people will switch to public transport, could seriously damage this strategy and set off a spiral of decline, as all the signs show that people would simply drive to the nearest out-of-centre development where parking would be freely available. This would be followed by a flight of investment from centres. Cutting back car parking provision in centres should be seen for what it is: a unsustainable development strategy.

The distinction for the purposes of parking provision and parking standards should be between centres and out-of-centre developments, with restrictions being developed to deter inappropriate out-of-centre developments by guiding development into centres, and providing adequate car parking to support them. Basing car parking on other criteria (aside from purely traffic and road safety) is confusing the issue and potentially counterproductive to an urban renaissance.

If “Yes” please answer Questions **PS2- PS12**, if “No” please move to the ‘Road User Charging’ section on page xx.

**PS2: Should regional parking standards be identified for land uses not included in national guidelines (PPG13: Transport) and if so which?**

Not applicable – see response to PS1.

**PS3: Should some parking standards only be defined in the LDFs, and if so which?**

Not applicable – see response to PS1.

**Possible Approaches**

Four approaches have been considered to help identify how parking standards can be more regionally specific, these are described further below and your views are sought:

- Criteria Based;

- Settlement Characteristics;
- Local Accessibility; and
- Site Specific Accessibility.

The Settlement, Local and Site Specific Accessibility approaches all describe how parking standards could vary from the national guidelines (PPG13: Transport) depending on specific circumstances.

### **Criteria Based**

This approach sets out criteria for local authorities to consider when setting out local parking standards in their LDFs and LTPs. This approach does not intend to provide specific standards in the WMRSS 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. In developing standards authorities would also need to consider the environmental impact of parking standards, particularly on heritage areas.

The suggested criteria to be considered in determining regionally specific parking standards are:

- How accessible is the site by public transport;
- The level of Traffic Congestion;
- Parking Availability (in relation to demand);
- Economic Need;
- Social Need; and
- The level of parking needed for the operational needs of the site.

### **PS4: Do you agree with these suggested criteria?**

Not applicable – see response to PS1.

### **PS5: Should any other criteria be considered?**

Not applicable – see response to PS1.

### **Settlement Characteristics**

This approach suggests that different settlements should have regionally specific parking standards, according to the classification of the settlement. Consultant's research suggests that:

**Small Settlements**, such as rural market towns and regeneration areas, should continue with PPG13 standards.

**Larger Urban Areas and very large developments**, with reasonably good levels of public transport accessibility, should have parking standards 50% that of PPG13.

**Large City Centres**, served by comprehensive public transport networks, should have parking standards 20% that of PPG13.

To help understand how this policy would affect parking provision, for every 100 m<sup>2</sup> of non-food retail development proposed in an area: the maximum number of parking spaces in:

- Small Settlements developments would have 5 parking spaces;



- Larger Urban Areas and very large developments would have 2.5 parking spaces; and
- Large City Centre developments would have 1 parking space.

**PS6: Do you agree with the principle of dividing the Region into settlement types?**

Not applicable – see response to PS1.

**PS7: Do you agree with the definitions of the settlement types?**

Not applicable – see response to PS1.

**PS8: Do you agree with the 50% and 20% reductions?**

Not applicable – see response to PS1.

**Local Accessibility**

This approach suggests that parking standards should be based on a public transport accessibility indicator, so the greater the potential for public transport access, the stricter the parking standards.

The public transport accessibility indicator is based on the number of buses, trams and trains entering the central area of a settlement between 7:30am to 9:30am on a weekday (it does not take account of vehicle capacity, vehicle loadings or the origin of the services). However, the public transport accessibility indicator shows the potential of a place to attract people by transport modes other than the car.

The technical study has identified three levels of public transport accessibility:

**Poor Access**, between 0-100 inbound buses, trams and trains in the morning peak period, would continue with PPG13 standards.

**Good Access**, between 100-1000 inbound buses, trams and trains in the morning peak period, would have parking standards 50% that of PPG13.

**Excellent Access**, in excess of 1000 inbound buses, trams and trains in the morning peak period, would have parking standards 20% that of PPG13.

To help understand how this policy would affect parking provision, for every 100 m<sup>2</sup> of non-food retail proposed in an area:

- Poor Access Centres would have 5 parking spaces;
- Good Access Centres would have 2.5 parking spaces; and
- Excellent Access Centres would have 1 parking space.

**PS9: Do you agree with this Local Accessibility approach?**

Not applicable – see response to PS1.

**PS10: Do you agree with the 50% and 20% reductions?**

Not applicable – see response to PS1.

**Site Specific Accessibility**

The DfT has recently developed an accessibility planning tool Accession, this has been supplied to all Local Transport Authorities. Accession quantifies accessibility, based on sustainable transport journey times to the destination. The technical study suggests that Accession could be modified to measure the relative accessibility of proposed new development sites across the Region and help identify complementary parking standards.

The Site Specific Accessibility approach quantifies a proxy for the level of accessibility to the proposed site from a number of assumed origins. The proxy is based on average journey times by public transport, cycling and walking. This information is then plotted on a zone map.

The zone map would show how accessible a place is, by transport modes other than the car, and would help to determine the appropriate parking standard for the proposed development.

It is suggested that the sustainable mode journey time proxy would be split into three categories:

Sites with **Poor Journey Times**, these would continue with PPG13 standards.

Sites with **Average Journey Times**, these would have parking standards 50% that of PPG13.

Sites with **Excellent Journey Times**, these would have parking standards 20% that of PPG13.

To help understand how this policy would affect parking provision, for every 100 m<sup>2</sup> of non-food retail proposed in an area:

- Sites with Poor Journey Time would be 5 parking spaces;
- Sites with Average Journey Time would be 2.5 parking spaces, a 50% reduction; and
- Sites with Excellent Journey Time would be 1 parking space, 20% of the PPG13 standard.

#### **PS11: Do you agree with this Site Specific Accessibility approach?**

Not applicable – see response to PS1.

#### **PS12: Do you agree that site specific considerations should result in a 50% or 20% reduction in provision?**

Not applicable – see response to PS1.

#### **Evidence Base:**

The Parking Standards Study (September 2005) was undertaken on behalf of regional partners see: [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

The DCLG's PPG3: Housing and PPG13: Transport are available at:

[www.dclg.gov.uk/index.asp?id=1143940](http://www.dclg.gov.uk/index.asp?id=1143940)

[www.dclg.gov.uk/index.asp?id=1144014](http://www.dclg.gov.uk/index.asp?id=1144014)

## **Road User Charging**

**Objective:** To provide guidance on road user charging.

### **What to think about**

WMRSS Policy T8: Demand Management includes a policy that encourages local authorities to bring forward local road charging schemes in congested parts of the Region and the policy anticipates that further guidance should be developed for the next review of the WMRSS, to ensure consistency across the Region.

Since the publication of the WMRSS, the DfT has moved the demand management/road user charging agenda forward significantly, with the introduction of the Transport Innovation Fund (TIF).

The Region has been successful in receiving TIF monies to carry out studies to further investigate the potential for demand management in West Midlands Conurbation, and Shrewsbury. The studies were reported in September 2006 and contributed to the debate.

These are very important studies that will need to be considered carefully by the wide range of regional stakeholders. In their joint response to the WMRA Section 4(4) Brief, see [www.wmra.gov.uk/page.asp?id=208](http://www.wmra.gov.uk/page.asp?id=208), the Metropolitan Authorities suggest that the outcome of their work should inform future WMRSS policy.

Given the Government's recent position with TIF, it may be considered that the majority of the current WMRSS Policy T8 is still relevant. However, reference to a cordon charging scheme for Birmingham is no longer appropriate, until the outcome of the TIF work is completed.

The Regional Road User Charging policy revision also has strong links with other WMRSS Policies. It is therefore important to consider how changes to this policy relate to the growth and distribution of housing and employment land policies, for example, where traffic congestion is identified as a problem and potential knock-on effects in rural areas.

Your views are being sought on whether it is appropriate to propose minor amendments to the current WMRSS Policy T8, in the absence of the TIF outcome and a clearer position from Government, to be set out in the White Paper expected later this year.

**RUC1: Do you agree that the existing regional policy for Demand Management should remain the same until more is known of the outcome of the TIF work and the wider implications?**

No.

Reference should be made to work being done within the Region to the Transport Innovation Fund and any developments in terms of a National roll-out of Road User Charging.

**RUC2: Should the existing regional policy be changed to remove the reference to local charging schemes in the more congested city centres, such as Birmingham and include reference to the TIF and potential national scheme?**

Yes, with qualifications.

The policy should also make it clear that the introduction of any form of road user charging within the Region should not hamper the wider Urban Renaissance aspiration of the RSS. There is a clear danger that such a charge would effectively be a tax on living and doing

business in the MUA, encouraging further out-migration and deterring investment. In terms of national competitiveness, any policy changes should also make reference to a Regional scheme being considered as part of a wider National Roll-out of Road User Charging, so as not to penalise the Region in terms of economic growth when compared to other regions

### **Evidence Base:**

A Scoping Study (Yet to be published)- must be published by Jan was undertaken on behalf of regional partners see: [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

Further work supporting West Midlands TIF may be found at:  
West Midlands - [www.westmidlandsltp.gov.uk/default.php?id=2454](http://www.westmidlandsltp.gov.uk/default.php?id=2454)  
Shrewsbury - [www.shropshire.gov.uk](http://www.shropshire.gov.uk)

The DfT document 'Managing Our Roads' (July 2003) may be found at:  
[www.dft.gov.uk/stellent/groups/dft\\_roads/documents/divisionhomepage/030684.hcsp](http://www.dft.gov.uk/stellent/groups/dft_roads/documents/divisionhomepage/030684.hcsp)

## **Role of the Regions' Airports**

**Objective:** To establish the implications of the Air Transport White Paper (December 2003) for the Region, including:

- Future roles of Birmingham International (BIA), Coventry, Wolverhampton and Cosford;
- The wider spatial and economic impacts of any proposed airport expansion; and
- Subsequent master planning.

The review should identify any WMRSS policy changes necessary to both support the development and mitigate against environmental impacts.

### **What to think about**

**Climate change:** Airports and air travel have significant environmental impacts. Whilst aviation's share of greenhouse gas emissions is modest its rapid growth undermines progress made in other sectors.

**Communities:** Airports provide a link between ethnic minority and migrant communities with their country of origin, this is culturally and economically important. Airports and air travel are also large employers. Access to airports and future development of airports must take this into consideration.

The Air Transport White Paper (ATWP) (December 2003) [www.dft.gov.uk/stellent/groups/dft\\_aviation/documents/divisionhomepage/029650.hcsp](http://www.dft.gov.uk/stellent/groups/dft_aviation/documents/divisionhomepage/029650.hcsp) sets out a strategic framework for the development of airport capacity in the United Kingdom over the next 30 years. The ATWP includes a commentary for each Region. For ease of reference a summary of this Regions' section is provided below:

### **Birmingham International Airport (BIA):**

Traffic levels are forecast to increase by 2030 to between 32 million passengers per annum (mppa) and 40mppa (dependent in part on the level of growth at airports in the South East). The optimal capacity of the existing runway is likely be around 20mppa although this is

heavily dependent on the average number of passengers carried per aircraft and the diurnal profile of the traffic using the runway.

The consultation document put forward two options for a single additional runway at the airport - a close parallel runway around 400m to the west of the existing runway with significant dependency in its operation; or a wide-spaced runway with a separation of around one kilometre, which offers the potential for fully independent operation. The accompanying appraisal indicated that a wide-spaced runway would provide greater capacity and larger economic benefits, but would also have greater environmental impacts, especially in respect of the number of people subject to aircraft noise. Both options included lengthening of the existing runway to allow services to be offered to more distant destinations and larger aircraft types to use the airport.

In October 2002 the airport operator published its own variant proposal ('The Birmingham Alternative') in response to DfT consultation. This included a shortened wide-spaced runway option (limited to 2,000 metres) together with other adjustments, designed to reduce land-take in sensitive locations. This option, which is a refinement of the wide-spaced option in the consultation document, would provide sufficient capacity to handle forecast traffic to 2030 and beyond. It would also give strong economic benefits and, taken together with extension of the existing runway, should be capable of catering adequately for the anticipated future mix of traffic at the airport.

Only smaller types of aircraft (turboprops, regional and narrow bodied jets) would be able to use the new short runway, and to mitigate potential noise impacts this could be limited further to the quieter types. As a result, the noise impacts would be significantly less than with the full-length wide-spaced option, which could have accommodated much noisier, larger and wide-bodied heavy aircraft. Nonetheless, the impacts could still be large, with possibly 81,000 people living within the 57dBA noise contour in 2020 compared to 34,000 in the 1999 base year under DfT latest assumptions. The numbers affected could be higher still by 2030 without significant technology improvements beyond 2015.

In response to the consultation, there was strong support among aviation industry, economic development and business stakeholders in the Region for the development of a second runway at BIA. This was accompanied by recognition among some other stakeholders, including a number of local authorities, of the considerable economic benefits that this would bring to the Region and the UK as a whole. However, potential noise impacts were a major area of concern for local people, environmental groups and a number of other stakeholders.

Of the options proposed, there was strongest support for the 'Birmingham Alternative' proposal. The Government shares the view that this would be the best option. It would require less Green Belt to be taken and the loss of fewer properties than the full-length option, and avoids the loss of Bickenhill Meadow Site of Special Scientific Interest. It could also be phased more effectively, and would not require a major diversion of the A45 and it would have lower noise impacts than the full-length option.

DfT consider, however, that noise impacts on the scale that could arise from the new runway must be addressed.

DfT have concluded, therefore, that the growth of BIA should be subject to stringent limits on the area affected by aircraft noise, as an incentive to airlines to introduce the quietest suitable aircraft as quickly as is reasonably practicable. The limits should look at least ten years ahead, and will need to be reviewed at intervals between now and 2030 to take account of emerging developments in aircraft noise performance.

DfT also agrees with the airport company that the new runway should be limited to aircraft with a noise quota no greater than 0.5 (typically this means modern variants of aircraft such as the Boeing 737 and Airbus A320 families), and should not be used at night.

With a new runway operating, emissions modeling predicts that NO<sub>2</sub> levels will be within the EU 40µg/m<sup>3</sup> annual limits.

Subject to these conditions, the DfT has concluded that the option put forward by the operator is on balance acceptable, and are satisfied that it is a significant improvement on the original full-length option. The DfT therefore invite the airport operator to safeguard the land required, to develop a master plan and to consult the interested parties on this, as an input to future revisions of the WMRSS and the local planning framework prior to the preparation of a planning application.

Although forecasts suggest the runway may be needed around 2016, it is for the airport operator to judge when the project would be commercially desirable and, accordingly, when it would be appropriate to submit a planning application. In the meantime, the airport operator will also need to put in place a scheme to address the problem of generalised blight resulting from the runway proposal.

The airport operator will also need to work closely with the Strategic Rail Authority, the Highways Agency and regional stakeholders to develop a robust strategy for improving surface access to the airport. The aim should be to improve the public transport mode share significantly, with 25% as a long-term target. Improved rail, bus and coach services will need to contribute to this, alongside the new interchange at Birmingham International Station and new SkyRail connection to the Airport.

Road access to the airport and future capacity requirements on the M42 between Junctions 3 to 7 will also need to be reviewed. This review will need to ensure that there is adequate capacity for both background and airport traffic growth on this key section of motorway. It will also need to address the complexities associated with designing an acceptable widening scheme for the M42 and new airport access arrangements from the motorway, should these prove to be necessary. These will need to be considered alongside other factors such as the pressures of other potential developments along this corridor and the results of the Advanced Traffic Management scheme currently being piloted by the Highways Agency. The airport operator should initiate such a review with the Highways Agency, in conjunction with regional and local interests, at an early stage.

### **Wolverhampton Business Airport (WBA)**

WBA should continue its role of serving business and general aviation. The airport could be capable of delivering commercial services on a limited scale, but should do so only in line with regional planning and transport priorities, and the scale of development at the site must take account of the constraints imposed by the lack of strategic road access. With this in mind, any such development should be a matter for decision locally.

### **Coventry Airport**

Coventry Airport currently serves a specialist role within the region, catering for business aviation, air mail and some freight, and can continue to perform this role within existing constraints. There is a current planning application for a terminal development at the airport. However, in the light of the DfT's conclusions on capacity elsewhere in the Midlands, and having regard to potential surface access, environmental and airspace constraints, the DfT

would not envisage any significant further development being appropriate beyond the level of passenger throughput in the current application.

## **RAF Cosford**

There could be potential for the commercial use of RAF Cosford, but this is dependent on the RAF's decisions on spare capacity. If the RAF decided to make capacity available, it would be for local and regional planning bodies in the first instance to decide on the appropriate scale of development.

## **Current Position**

The DfT is expected to produce an update report for the Air Transport White Paper (ATWP) towards the end of 2006. Since the publication of the ATWP airport proposals have moved on:

**Birmingham International Airport (BIA)** published its Draft Masterplan in November 2005.

In April 2006, **Coventry Airport** received planning permission for the Interim Passenger Facility and now has permission to grow to 0.98 mppa. A Public Inquiry considering further passenger growth to 2 mppa ended in July 2006, the Inspector's decision is expected during 2007.

**Wolverhampton Business Airport (WBA)** had a planning application for the development of a new runway, an engine facility and the removal of a restriction on the use of jet aircraft in June 2004. The planning application envisaged 0.5 mppa. The application was withdrawn in November 2005.

**Cosford** is currently being considered for a major defence training contract.

## **What to think about**

When considering your response please consider the social, economic, and environmental implications of airport development 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. Airports provide an economic and social link between ethnic minority and migrant communities to countries of origin. They can also act as attractors for employment and housing development as well as generating transport movements and associated environmental impacts; for example noise pollution.

## **Suggested Policy Revision**

The suggested approach is that the WMRSS should be revised to take account of the ATWP and the current position with the Region's airports. This would mean that WMRSS Policy T11: Airports would be revised to:

- Support the extension of the runway and associated works at BIA;
- Safeguard the development of a second runway as set out in the ATWP at BIA;
- No further development of Coventry Airport beyond the outcome of the Public Inquiry;
- Continue Wolverhampton Business Airport role of serving business and general aviation;

- Consider the role of RAF Cosford following the outcome of the Defence Training Review; and
- Amend modal split targets for BIA in the WMRSS Monitoring section.

The requirements in relation to environmental assessment and mitigation would remain.

### **A1: Do you have any comments on this approach?**

Generally agree with the proposal to support the expansion of BIA becoming the primary airport for the Region. However, if further expansion at other airports is deemed appropriate, it should be done via a sequential approach. Therefore, initial growth would be directed at BIA because of its high accessibility to the rest of the region and beyond via its good highway and strategic rail links. The implementation of this could be strengthened by ensuring that any proposals to increase capacity elsewhere, during BIA's initial expansion plans, requires applicants to first demonstrate that such increased capacity could not be accommodated at BIA and that they would complement and not prejudice BIA's expansion plans.

The proposed policy about Wolverhampton Business Airport does not make any links to its scale of operation and the constraints imposed by its lack of quality access, as defined within the Air Transport White Paper. We feel that this should be added.

### **A2: What surface access modal split targets should be included in the WMRSS?**

Any modal split targets included within the RSS need to pick up differences between car-based and more sustainable modes of travel. The breakdown of sustainable modes we feel is a matter for BIA. However, we do believe that the targets should be disaggregated between passengers and employees.

The policies around achieving any modal split targets could be strengthened by ensuring that developers outline how their proposals will impact on any modal split targets and require them to commit to delivering the improvements necessary to achieving the targets.

### **Role of Airports**

It is expected that the Spatial Options will consider the roles of the Region's airports. Each airport has a variety of roles, for example they:

- Support the local and regional economy, connecting us with international markets for business, goods and services;
- Provide different patterns of use, some are seasonal, while others are busier on weekends or weekdays;
- Generate ancillary activities, including car parking, security, catering and maintenance; and
- Attract economic activity to the wider area.

The role of the Region's airports may be defined in more detail as follows:

Birmingham International Airport, the Region's principal international airport providing:

- Long haul international services;
- International Scheduled and Non Scheduled Services;
- Domestic Scheduled and Non Scheduled Services;
- Business aviation; and
- Belly held freight.



Coventry Airport, providing a complementary role to BIA, providing:

- International and domestic scheduled and non scheduled services to an overall maximum to be determined by the outcome of the current S78 Public Inquiry;
- Dedicated Freight Services;
- Business Aviation; and
- General Aviation.

Wolverhampton Business Airport:

- Continuing its role of providing business and general aviation.

RAF Cosford:

- To be reviewed following Ministry of Defence announcements.

**A3: Do you agree with the roles described above for each airport?**

Yes.

### **Masterplanning**

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 WMRSS 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 LDF and the LTP. These documents can then consider the wider development implications and priorities.

**A4: Is the requirement for an ‘Airport Development Document’ an appropriate policy to include in the WMRSS?**

Yes.

**A5: If an ‘Airport Development Document’ policy is not supported, then how else can the WMRSS manage the wider impacts of airport development?**

Not applicable – see A4.

### **Other Airports**

Even though there are several airports in the Region, many people use airports elsewhere, particularly those in the London area, Manchester and East Midlands.

**A6: Should the WMRSS include policies to deal with airport related cross-boundary planning issues?**

Yes.

### **Evidence Base:**

The reports below have been produced on behalf of the WMRA, along with an 'in-house' reference document, all of these may be found at: [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

- The Regional Economic Impact of Airport Expansion (July 2005)
- Air Transport – Surface Access and Environmental Issues (August 2005)
- Coventry Airport Airspace Implications for the Regional Spatial Strategy (To be published)
- West Midlands Environmental Baseline Reference Document (To be published)

# What Happens Next?

After all of the views have been collected and analysed the RPB writes a Preferred Option this is a set of WMRSS Policies and an explanatory text.

There will be a short informal consultation on the Preferred Option by the RPB before sending it to the Secretary of State. As soon as the Secretary of State receives the Preferred Option a formal public consultation is carried out for twelve weeks. For more information about this see [www.gowm.gov.uk/gowm/Planning/?a=42496](http://www.gowm.gov.uk/gowm/Planning/?a=42496) After this an Examination in Public is held. For more information about this see the Project Plan, or Planning Policy Statement 11 on [www.communities.gov.uk/embedded\\_object.asp?id=1143844](http://www.communities.gov.uk/embedded_object.asp?id=1143844)

## What happens to my views?

Responses to this consultation will be summarised and available on the web. The Secretary of State will also be sent a pre submission consultation statement setting out how the Statement of Public Participation was met, what consultation was carried out and how successful it was.

# Evidence Base

The Spatial Options have been written with a lot of consideration for background information and technical detail, called the evidence base. The table below summarises the studies and technical work that has been carried out by the WMRA/RPB. This information will provide the evidence for the Preferred Option when being debated at the Examination in Public. All the technical work shown in the table below along with a list of more evidence not directly used by the Policy Leads in preparing the Spatial Options is all available on the website [www.wmra.gov.uk/page.asp?id=121](http://www.wmra.gov.uk/page.asp?id=121)

<b>WMRSS Phase Two Technical Work</b>
WMRSS Affordable Housing Study - Final Report (September 2005)
WMRSS Housing Phasing Study - Final Report (June 2005)
Regional Housing Land and Urban Capacity Study 2004 (August 2005)
Airports Economic Study - Final Report (July 2005)
Air Transport - Surface Access & Environmental Issues (August 2005)
Parking Standards Study - Draft Scoping Report (September 2005)
West Midlands Strategic Park and Ride Strategy (September 2003)
West Midlands Regional Freight Study - Final Report (January 2005)
Regional Waste Scenarios Study (July 2005)
West Midlands Waste Facilities - Future Capacity Requirements (November 2004)
Waste Treatment Capacity Survey (August 2004)
Waste Residues Report (June 2006)
West Midlands Regional Logistics Study - Final Report (September 2005)
Regional Centres Study (March 2006)

The **Annual Monitoring Report** and supplementary Reports also form part of the evidence base, see [www.wmra.gov.uk/page.asp?id=52](http://www.wmra.gov.uk/page.asp?id=52)

The **Phase One Revision:** Black Country Study evidence base, where relevant will also be taken into account in developing the Preferred Option for Phase Two, it can be seen on the website [www.blackcountryconsortium.co.uk/page.asp?PageRef=53](http://www.blackcountryconsortium.co.uk/page.asp?PageRef=53)

The **Regional Economic Strategy** is currently being reviewed by AWM, part of this process is to develop an evidence base. More information about the WMES Review and evidence base can be found at [www.advantagewm.co.uk/wmesreview.html](http://www.advantagewm.co.uk/wmesreview.html)

As part of the **Sustainability Appraisal**, see page [aaaa](#), a SA Scoping Report was published, this includes a baseline data survey. This document can be seen here [www.wmra.gov.uk/page.asp?id=245](http://www.wmra.gov.uk/page.asp?id=245)

## Jargon Buster

Most technical words have been explained throughout the Spatial Options, where it has been unavoidable to use technical words they have been included below: The Project Plan has a longer version of this Jargon Buster, these are extra words and terms that have appeared in the Spatial Options.

<b>Commercial Waste</b>	Commercial waste comes from premises used wholly or mainly for trade, business, sport, recreation or entertainment; excludes household and industrial waste.
<b>Industrial Waste</b>	Industrial waste is waste from a factory or industrial process; it excludes wastes from mines and quarries and agricultural wastes.
<b>Local Development Framework</b>	A folder of Local Development Documents, produced by Local Planning Authorities and have to be in conformity with the WMRSS.
<b>Regional Logistics Sites</b>	Regional Logistics Sites (RLS) are employment sites that concentrate warehousing and distribution facilities.
<b>Municipal Waste</b>	All waste collected by local authorities including waste collected from households, Household Waste Recycling Centres, litter bins, street sweeping and fly tipping.
<b>Planning Policy Statements</b>	Issued by central Government, replace Planning Policy Guidance notes. They explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system.
<b>Project Plan</b>	It sets out how and when the Revision will be addressed and which policies will be reviewed. It also describes how stakeholders, Regional partners and the public can get involved.
<b>Regional Economic Strategy</b>	Provides the framework, and defines the actions necessary, for the Region's economic development and regeneration, produced by AWM.
<b>WMRSS – West Midlands Regional Spatial Strategy</b>	A statutory development plan for the Region to show how it should look in 15 years time or more. It identifies the scale and distribution of new housing, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment/disposal.
<b>Section 4(4) advice Strategic Authorities</b>	Detailed advice from the Strategic Authorities to the RPB. Country Council, Metropolitan and Unitary Authorities.
<b>Spatial Planning</b>	Spatial Planning brings together, and integrates, policies on land use with other guidance designed to influence the nature of places and how they function.
<b>(SoS) Secretary of State</b>	The Minister responsible for all policies relating to Town and Country Planning. For example publishing the WMRSS.

<b>Urban Capacity</b>	Applies equally to urban and rural areas and considers the amount of land available for development.
<b>Waste Collection Authorities</b>	District Councils and Unitary Authorities are responsible for collecting Household Waste and they may make arrangements to collect waste of a similar nature from small businesses.
<b>Waste Disposal Authorities</b>	County Councils and Unitary Authorities are responsible for making arrangements to dispose of Household Waste collected by Waste Collection Authorities in their area and for operating and disposing of waste from Household Waste Recycling Centres.
<b>Waste Facilities</b>	

## Contact Us

### West Midlands Regional Assembly

Regional Partnership Centre, Albert House, Quay Place, 92-93 Edward Street, Birmingham, B1 2RA, Telephone - 0121 245 0200 Fax - 0121 245 0201 [www.wmra.gov.uk](http://www.wmra.gov.uk)

Chief Executive Olwen Dutton [chiefexecutive@wmra.gov.uk](mailto:chiefexecutive@wmra.gov.uk)

Director of Policy Rose Poulter [r.poulter@wmra.gov.uk](mailto:r.poulter@wmra.gov.uk)

Head of Planning David Thew [d.thew@wmra.gov.uk](mailto:d.thew@wmra.gov.uk)

Strategic Advisor: WMRSS Revision Tanya Rountree [t.rountree@wmra.gov.uk](mailto:t.rountree@wmra.gov.uk)

### WMRSS enquiries

All RPB staff can be contacted by emailing [wmrss@wmra.gov.uk](mailto:wmrss@wmra.gov.uk) or by phoning 0121 245 0200.

### Policy Leads

Urban Renaissance: Sandy Taylor [sandy.taylor@birmingham.gov.uk](mailto:sandy.taylor@birmingham.gov.uk) 0121 303 4026

Rural Renaissance: Nick Taylor [nick.taylor@shropshire-cc.gov.uk](mailto:nick.taylor@shropshire-cc.gov.uk) 01743 252 502

Communities for the Future: Ada Wells [ada.wells@staffordshire.gov.uk](mailto:ada.wells@staffordshire.gov.uk) 01785 277 350

Prosperity for All: David Carter [david.r.carter@birmingham.gov.uk](mailto:david.r.carter@birmingham.gov.uk) 0121 303 4041

Town Centres: (up to January 2007) Tony Lovett [tony.lovett@staffordshire.gov.uk](mailto:tony.lovett@staffordshire.gov.uk) 01785 277 363

Quality of the Environment: Maurice Barlow [mauricebarlow@solihull.gov.uk](mailto:mauricebarlow@solihull.gov.uk) 0121 704 6393

Waste: Bruce Braithwaite [bruce.braithwaite@staffordshire.gov.uk](mailto:bruce.braithwaite@staffordshire.gov.uk) 01785 277 330

Minerals: Paul Wilcox [paul.wilcox@staffordshire.gov.uk](mailto:paul.wilcox@staffordshire.gov.uk) 01785 277 270

Transport and Accessibility: Peter Davenport [peter.davenport@staffordshire.gov.uk](mailto:peter.davenport@staffordshire.gov.uk) 01785 276 630

Monitoring: Amanda Turner [amanda.turner@staffordshire.gov.uk](mailto:amanda.turner@staffordshire.gov.uk) 01785 277 356

Plan Monitor Manage: Clive Lloyd [clloyd@worcestershires.gov.uk](mailto:clloyd@worcestershires.gov.uk) 01905 766 714

WMRSS/WMES Alignment: Mahmood Azam [m.azam@eaststaffsbc.gov.uk](mailto:m.azam@eaststaffsbc.gov.uk)

Culture: Maggie Taylor [maggietaylor@sportengland.org](mailto:maggietaylor@sportengland.org)

Rural Proofing: Sara Roberts [s.roberts@wmra.gov.uk](mailto:s.roberts@wmra.gov.uk)

Requests for translation, interpretation, large text and audio tape will be dealt with on an individual basis, and should be directed to: [access@wmra.gov.uk](mailto:access@wmra.gov.uk) or telephone 0121 245 0200.

The Regional Planning Body has prepared these Spatial Options and will conduct the Revision within the framework of the Race Relations (amendment) Act 2000 and the Disability Discrimination Act 1995.

If anyone has any issues or complaints with regards to these Spatial Options please contact: the Olwen Dutton, Chief Executive of West Midlands Regional Assembly, [chiefexecutive@wmra.gov.uk](mailto:chiefexecutive@wmra.gov.uk) 0121 678 1031.