Redditch Borough Council's Response to the West Midlands Regional Spatial Strategy Phase Three Revision Options Consultation 29th June 2009 – 14th August 2009

Critical Rural Services

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> **Question CRC1: Studies have shown that it is very difficult to define rural services as "important" or "critical", and that pursuing these definitions is unlikely to be of much value. Do you agree with this view?**
>
> **Please tick one box ✓ Yes O No**
>
> **If no, please provide reasons and a list of those rural services that you consider to be "critical".**

It is agreed that there is limited value in applying the definitions of 'important' and 'critical' to rural services. It is considered that rural areas, particularly those that are more remote, cannot be expected to contain the same range of services as more urban areas. Also the value of services differs between different settlements such that services that may be considered important to one rural location may not be considered important for another settlement. It should be left to local authorities to consider what types of services are important or critical to each settlement.

In Redditch Borough, the size of the rural area is limited and rural settlements aren't considered to be suffering from significant service deprivation (both Astwood Bank and Feckenham are not considered to be deprived, in particular Feckenham is considerably less deprived in terms of income than any of the other Redditch wards) *(Taken from Local Development Framework Sustainability Appraisal Scoping Report October 2008)*. There is a strong urban-rural interdependence in Redditch, and all rural areas have sufficient accessibility to services that are considered 'important' and 'critical' due to their close proximity to the urban area.

Please see attached the Redditch Borough Council Rural Accessibility and Settlement Hierarchy Assessment for information regarding the relative accessibility of the two rural settlements of Astwood Bank and Feckenham.

> **Question CRC2: The SQW Report identified significant service deprivation issues for people in "accessible rural" areas whose access to transport is limited (see page 21). Do you think more attention should be given to meeting the service needs of this group?**
>
> **Please tick one box   O Yes   ✓ No**
>
> **If yes, please provide reasons (and where possible, evidence) for your answer.**

Redditch's rural settlements are close to the urban area and therefore they have reasonable access to a range of services. The impact of carbon emissions resulting from transportation to the urban area highlights the need to improve accessibility through sustainable transport options. It is considered that this should be the focus of policy rather than aiming to increase the services in rural areas. It has been accepted that rural areas particularly those that are more remote cannot expect to have excellent accessibility to a range of services. It is considered that needs in any particular area should be addressed on an application basis, and that redirecting development to rural areas is unsustainable and goes against the thrust of national planning policy (particularly PPS 6).

> **Question CRC3: Arguments have been put forward that new development should be allowed in settlements lacking a service base in order to reverse a cycle of decline in such places. ("Planning for Sustainable Communities" – CRC; "A Living and Working Countryside" – Taylor Review). Do you agree with this view?**
>
> **Please tick one box   ✓ Yes   O No**
>
> **If yes, please provide your reasons and any relevant evidence, including identified locations, and suggestions**

A portion of development should be permitted to allow settlements to survive, however any development should be tailored to the needs of that settlement and subject to certain restraints. For example, any policy should give a prescriptive framework which would allow local decisions to be made and restrict unnecessary development; control should be agreed at the local level.

A general approach to allow unrestricted development in settlements that currently lack a service base would go against the thrust of national policy (particularly PPS 3 and PPS 6) which advocates locating new development in the

most sustainable locations.

Redditch Borough's rural settlements are not considered to be significantly lacking access to a service base. However, affordable housing is considered to be a different matter; this is considered to be an important service. Affordable housing should come forward in rural areas without harm to other environmental, social and/ or economic conditions.

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

Please tick one box

O Option 1: Sustainable – Climate Change Driven
O Option 2: Community Based
O Option 3: Status Quo

Please provide reasons for your preference

Option 1 has an emphasis on reducing the need to travel, in particular point b), the end of point c) and point d) of the WMRSS Consultation Document. This option would generally support the objective for Rural Renaissance within the Region and therefore from this perspective can be supported.

It is considered that developing services in rural areas is at odds with the objective for mitigating climate change through reduction of CO_2 emissions, and a careful balance needs to be struck between protecting the needs of the vulnerable (where ICT based alternatives are simply unusable) and the needs of future occupants within any given area.

The intention of *"concentrating most service provision in County and Market towns"* may conflict with the RSS objective for urban renaissance. WMRSS Phase Two Revision Preferred Option (December 2007) Policy PA12B preamble states that centres that fall outside the network of strategic town and city centres including market towns, are places which people use regularly to satisfy their day-to-day needs. Therefore they should not be meeting additional need by locating extra services in County and Market towns; they should primarily meet local needs (stated in PA12B).

Emphasis on 'multi-use centres' needs to be clarified as there is currently no such designation in the WMRSS and it is unclear where this applies.

Option 2 considers the use of *"locally led reviews of service levels"* which is supported by Redditch Borough Council. The definition of 'sustainability trap',

which is where development can only occur in places that are already considered to be sustainable, as defined as in the 'Living, Working Countryside – The Taylor Review of Rural Economy and Affordable Housing Report' (2008), would be applicable to the community of Feckenham in Redditch Borough, as this settlement has been deemed unsustainable through previous Local Plan reviews. The approach of the 'sustainability trap' generally restricts development in unsustainable rural areas. However, as previously stated, due to the urban-rural interdependence that Redditch has established within its Borough, in which rural settlements are easily catered for by the nearby urban areas, it is not considered appropriate to direct significant services to the community of Feckenham. Rather any development should be based on needs. It is questionable whether this option would be deliverable at a regional level. Districts would find this option hard to implement without both strong support from the Region and clear guidelines to develop a local study or programme.

An implication of Option 2 is that the Option could lead to *"more private travel, with adverse consequences for CO2 emissions"* (page 22). Climate change and encouraging sustainable travel are considered to be significant issues to address; therefore any approach which would harm the progress towards addressing these issues would not be supported and, for this reason, this option is not advocated, as this goes against the key objectives of the RSS.

It is considered that Option 3 would not achieve significant gains in Redditch as the Borough is restricted by its boundaries in terms of potential capacity for development, including service provision. The implication that *"flexibility can also lead to uncertainty, making the task of policy development in LDFs and LTPs more difficult"* (page 23) is agreed with.

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

Rural areas need additional investment in broadband internet facilities to enable Option 1 to be feasible.

The confines of the Rural Settlement Strategy should be adhered to when preparing an appropriate strategy for the rural areas. Public transport use should be encouraged and maximised wherever possible and a framework should be set which takes into account local level considerations when implementing local reviews of service provision.

The use of ICT and mobile facilities would be welcomed in the rural areas of Redditch. Strong relationships with infrastructure providers would be required to ensure that they have the capacity to deliver this aspiration. RBC are currently conducting a series of infrastructure delivery workshops with infrastructure providers to consider the capacity of the services needed to cope with the development figures set out in the RSS Phase II Revision which will feed into the Delivery Strategy that accompanies the Core Strategy.

Any decisions relating to the development of settlements should be made by the local community and the local council both of which have the greatest knowledge of the settlements.

Other comments on critical rural services

The Background Paper, "Rural Proofing Options on Critical Rural Services" with regard to RP10: Communications, states that, a clear communication policy encouraging the support from rural communities is essential. It is unclear where this policy need has been addressed in the Phase III Revision Options document and how the communication with the rural communities will be established.

Gypsies and Travellers

Gypsies and Travellers

> **Question GTQ1: Do you agree with the total residential pitch requirements (939 pitches), as identified by the sub-regional Gypsy and Traveller Accommodation Assessments?**
>
> **Please tick one box** ✓ Yes   O No
> **If no, please provide reasons (and where possible, evidence) for your**

The GTAA is based on need and therefore is considered to be accurate.

> **Question GTQ2: Do you think the three Options on page 35 for the provision of residential Gypsy and Traveller pitches provide a good range of solutions?**
>
> **Please tick one box** O Yes   ✓ No
> **If no, do you think there is another Option which could be explored? Please provide reasons (and where possible, evidence) for your answer.**

It is unclear why there is a need for three options. As the GTAA has assessed a specific need, it would seem logical to deliver on that need. Any additional pitch provision may result in unnecessary designations on land that may already be in demand for other needs, for example housing or employment land is particularly sought after in Redditch Borough due to the limited capacity for new development.

> **Question GTQ3: Which of the three Options on page 35 for the provision of residential Gypsy and Traveller pitches do you prefer and why?**
>
> **Please tick one box** ✓ Option 1   O Option 2   O Option 3
> **Please provide reasons for your preference.**

Option 1 appears to be the most suitable as this delivers the need for the Region, in the principal locations and is supported by the evidence presented in the GTAA. This option is in conformity with current national guidance which requires provision to be made where necessary (Circular 01/2006 and Circular 04/2007).

With regard to Option 2, this target is unrealistic for Redditch Borough. This option includes using 'unconstrained land' within each District; and, on this basis, 4 additional pitches would be required within Redditch. It is considered that Redditch Borough does not have any unconstrained land that could take

additional pitch provision. The current Strategic Housing Land Availability Assessment for the Borough suggests that land for permanent housing is extremely limited; this principle would apply to pitch provision. There are significant constraints in terms of capacity due to the fact that Redditch Borough abuts its boundaries. Future development outside of the boundary is currently being considered through the RSS Phase II Revision.

It is considered that the dwellings allocated through the Phase II Revision Preferred Option would ensure Redditch is developed to its capacity and therefore additional space for pitch provision would be extremely limited. As Gypsy and Traveller provision is only being considered through the Phase III Revision, Gypsy and Traveller provision has not been considered in previous studies that consider the development capacity of Redditch Borough, for example the *'Study into the future growth implication of Redditch',* which fed into the Phase III Review.

Option 3 for Redditch Borough would be unachievable. The content of the Option appears unsustainable and suggests locating development in areas where there is no evidence of a requirement. It appears this Option is presented simply to provide a 'choice' rather than based on evidenced need or principles of sustainable locations and development.

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

Please see response to GTQ3.

> **Question GTQ5: Do you think the numbers allocated in Table 2 on page 40 for Transit provision (244 pitches) will meet the accommodation needs of Gypsies and Travellers?**
>
> **Please tick one box   ✓ Yes   O No**
> **If no, please provide reasons (and where possible, evidence) for your**

The figure of 18 pitches presented in the options document reflects the need outlined in the GTAA and therefore seems appropriate.

However the GTAA for the South Housing Market Area states that the need for Redditch is *"A Temporary Stopping Place for not less than 18 pitches to accommodate short term needs, as identified in 4.5 (of this assessment. This might be located <u>within that part of Bromsgrove District that borders Redditch</u>*

(own emphasis), providing both districts with a shared facility for dealing with future unauthorised encampments, and providing flexibility in meeting differing levels of need at different times." (page 28).

This evidence suggests that a shared facility could be located in Bromsgrove District. This cross-border working is significant as it proposes a means for contributing towards meeting the need for pitch provision where it arises and creating sustainable sites. It is considered that this sub-regional issue should be considered as part of the Policy approach in the Preferred Option to ensure that the most sustainable approach to delivering transit sites is secured. There has been no other evidence presented at this stage to suggest a recommendation other than that presented in the GTAA. The Strategic Housing Land Availability Assessment for the Borough suggests that land for permanent housing is extremely limited; this principle would apply to transit pitch provision. Also it is considered that the dwellings allocated through the Phase II Revision Preferred Option would ensure that Redditch is developed to capacity and therefore additional space for pitch provision would be extremely limited.

The GTAA for the South Housing Market Area makes reference to the fact that, *"suitable sites for Temporary Stopping Places should be identified close to main roads, in all of the locations identified by the Gypsy & Traveller Group as being where the majority of short stay Unauthorised Encampments take place; with at least one in each district (apart from Wyre Forest and either Redditch or Bromsgrove - which could share one close to their joint boundary)"* (page 22).

It is considered that this form of joint working would be appropriate to provide Transit sites where necessary, as the GTAA suggests *"there will be a particular need for cross boundary collaboration, as Temporary Stopping Places are required to accommodate families that, for the most part, show no greater connection with one district than with another"* (page 22).

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

Please tick one box   ✓ Yes   O No

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

Please see response above to Question GTQ5 regarding the most appropriate location for Transit Provision related to Redditch Borough.

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

Please tick one box   O Yes   ✓ No

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

It appears that strengthening of this policy from its current form would achieve very little.

Travelling Showpeople

Travelling Showpeople

> **Question TSQ1: Do you think the numbers allocated in Table 3 on page 42 for Travelling Showpeople (118 plots) during the five year period of 2007-2012 will meet their accommodation needs?**
>
> **Please tick one box   O Yes   ✓ No**
>
> **If no, please provide reasons (and where possible, evidence) for your answer.**

It is considered that the information in the GTAA for the South Housing Market Area is not based on credible and robust evidence, with regard to the provision for travelling showpeople. For example the document states that Redditch Borough has an authorised showman's quarters, this is untrue and therefore Redditch Borough would question the need for 14 yards of capacity for travelling showpeople.

As stated previously, Redditch Borough is constrained by its boundaries and therefore it should be demonstrated that the need for this provision is accurate. Redditch does not have the capacity to allocate for the provision required in RSS Phase II Revision within its boundaries, and therefore additional provision for the needs identified through the Phase III Review is considered unachievable. As provision for Gypsy, Traveller and Travelling Showpeople is not identified as a priority as part of the Phase II revision with mainstream housing, additional land availability that has not been designated will be extremely limited.

The Showpeople sites throughout the other districts within Worcestershire are, without exception, privately owned sites. Whilst Redditch Borough's existing provision is indicated to be the highest of the districts at 31 yards, it appears to be set the highest requirement for new pitches (14). This is based on a low interview percentage of 19 %. Malvern seem to have fewer yards at a greater person density, yet the perceived need is set at 8 yards based on 100% interviews, this queries what formulae the pitch provisions were calculated against, otherwise the above would imply that it is based on the interviewees coming up with a wish list number.

Individual 'yards' are required to be large enough to accommodate both dwelling and equipment/ trailer/ lorry. In addition, sites must incorporate adequate internal access to enable manoeuvring of articulated vehicles. The land requirement for these yards can be considerable and therefore there is concern over how the figure was determined and the implications this could have on land take in Redditch Borough.

The 'traveller' site provision appears to be based on a past incursion and no interviews. It seems unclear whether this 'requirement' excludes any element of double counting of the same group(s) at other neighbouring districts as it is well known that groups often travel from one district to another. That is not to say that a local provision for groups in transit through the area would not be beneficial. The Site and Interview report notes that the 'traveller type' is recorded as 'Irish with no wish for pitches on a managed site', so the provision of 'Emergency Stopping Places' would seem the only real option. This form of site also requires only basic site facilities according to the CLG 'Draft Guidance on the Design of sites for Gypsies & Travellers' i.e. cold water supply, Portaloo type sanitary provision, sewage disposal point and refuse disposal facilities. If Bromsgrove are minded to consider making land available for such a facility as suggested by the consultation report it would present an ideal opportunity for RBC to contribute and therefore gain such provision, particularly when considering the limited availability of land within Redditch Borough.

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

Please tick one box   O Option 1   O Option 2

Please provide reasons for your preference or if you think there is another Option which could be explored please provide reasons (and where possible, evidence) for you answer.

Option 2 does not appear to support the objective of urban renaissance because by implication it promotes development increases in the Shires rather than the conurbation.

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

Please tick one box

O Allocated on a County basis

O Allocated on a District basis

Please provide reasons for your preference.

It is not clear why the provision for Travelling Showpeople has been allocated on a County basis, as other figures are provided at the District level.

It is also not clear why the provision for Travelling Showpeople is given in plots, as the GTAA for the South Housing Market Area provides the needs of travelling showpeople in yards.

Culture, Sport and Tourism

Culture, Sport and Tourism

> **Question CST1: Which of the Options on page 53 do you think should be used as a basis of revising Policy PA10 Part A and why?**
>
> **Please tick one box**
>
> **O Option 1: Remove the portfolio**
> **✓ Option 2: Update portfolio to include all regionally significant assets**
>
> **If you have chosen Option 2, what assets (see B.O.P. report, item 11 on page 59) do you think should be added/removed and explain why you think they are or are not of regional significance.**

It is considered that there is no significant reason for removing the portfolio, as advocated by Option 1 and therefore the Option 2 has been selected as preferable.

Redditch Borough Council has no relationship with the regional assets detailed in Figure 8 of the BOP Report (2008) and therefore it is not appropriate to choose which assets should be detailed within a Policy.

To enhance local economies and encourage tourism it is considered that any policy developed should make reference to, and promote, the large amount of sub-regional assets that provide a cultural network throughout the region. Any policy should encourage people to access their local assets. This is suggested because although Redditch Borough only has assets of a sub-regional nature there are a number of issues related to cultural assets within the Borough that need to be addressed, these are:

- Best use is not being made of Redditch Borough's cultural assets and/or the tourism potential in neighbouring Stratford-on-Avon District or Birmingham

- Tourism in Redditch is underdeveloped in comparison to other Worcestershire Districts

- Low satisfaction with cultural facilities in Redditch Borough

It has also been identified that the cultural facilities in Redditch are not considered to be improving when compared with the mean value or the median value. More up to date information is available from the Redditch Borough Council Best Value Satisfaction Survey (March 2007) which indicates that 38% of the Redditch population are satisfied with the theatres/concert halls in Redditch

Borough. It also indicated that 33% are satisfied with museums and galleries and 56% are satisfied with arts activities and venues in Redditch Borough.
(This information is taken form the Redditch Borough Council Local Development Framework Sustainability Appraisal Scoping Report May 2008).

Therefore there is a requirement for an additional policy directed at existing cultural assets which require improvement.

Question CST2: Do you think that Policy PA10A should "protect", as well as improve existing strategic cultural assets from development?

Please tick one box ✓ **Yes** O **No**

If yes, please provide reasons for your answer and suggest how the WMRSS could protect the assets.

The principle of protection for *some* of the existing strategic cultural assets is supported, however it is considered that some assets may be prescribed additional, unwarranted protection that may stifle enhancement and restrict positive development. It must be noted that this aspect of the policy would only be supported if it were to ensure that sites that may benefit from enhancement or development are not restricted by this policy and a criteria-based approach is developed when considering which assets deserve protection.

Question CST3: Which of the Options on page 57 do you think should be used as a basis for revising Policy PA10 Parts B and C to address any gaps in strategic culture, sport and tourism assets provision in the Region?

Please tick one box

O **Option 1: Retain existing PA10 B & C**
O **Option 2: Update existing PA10 B & C**
✓ **Option 3: Develop a new policy in addition to PA10 B & C**

If you have selected Option 2 or 3, what new criteria do you consider are important to add and why?

It is considered that an additional policy would boost the WMRSS approach to enhancing the cultural offer of the region, there are however specific concerns should an additional Policy be considered.

An additional policy which promotes identifying broad locations for specific proposals, is supported as it strengthens the deliverability of the policy, however there is concern that this could restrict other locations delivering assets of a similar nature. To ensure the appropriate locations are suggested for the proposals it would be necessary for each Local Authority's Core Strategy evidence to be assessed to justify the location selected, as any development must be based on need.

The most appropriate approach would be to retain a criteria-based policy but enhance it to incorporate the provisions detailed in Option 3, and also to develop a broad location policy to show the deliverability of new regional cultural assets.

> **Question CST4: Do you agree with the strategic gaps identified in the Burns Owens Partnership (BOP) report? (see page 54).**
>
> **Please tick one box   ✓ Yes   O No**
>
> **If no, are there any other strategic gaps which you consider exist and what evidence exists to support your case?**

Findings from the BOP report appear to identify a coherent approach to analysing the strategic gaps. However it is considered that Redditch Borough has cultural assets which could be classed as sub-regionally significant and therefore should be included within Appendix 4 of the BOP Report (2008). These include:

- The Palace Theatre - The Theatre has great importance for the town's residents. Experts agree that the Palace is a rare example of Edwardian theatre architecture and is one of only six working examples that can be wholly attributed to its famous designer Bertie Crewe.
- Forge Mill Needle Museum – The museum tell the story of needle making in Victorian times. It illustrates the rich heritage of the needle and fishing tackle industries.
- Bordesley Abbey - A medieval Cistercian Abbey, which has been extensively excavated
- Arrow Valley County Park Countryside Centre

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

Please tick one box ✓ **Yes** O **No**

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

The Options detailed, if implemented fully, would significantly address issues of quality and access to cultural assets. However, there still appears to be a gap with regard to enhancing the current assets that already exist in the region. This needs to be addressed through a regional policy.

There is significant potential to encourage people to use their local assets and enhance local economies, as local facilities are generally more accessible in terms of transport, cost and relevance. It is accepted that this may be outside of the remit of the RSS, but would still work towards achieving the goals of the RSS with regard to culture.

A policy could also make reference to the need to ensure facilities are being used in a smart manner, for example exploiting opportunities for business use as well as leisure and tourism or developing links with schools to use facilities for educational purposes.

Quality of the Environment

Quality of the Environment

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

> **Question ENV1: Do you agree with the suggested list of issues a – f on page 65 that a revised Policy QE2 could include?**
>
> **Please tick one box   O Yes   ✓ No**
>
> **Are there any suggested issues which you think a revised Policy QE2 should not include? If so, please tell us why you think these issues should be excluded.**

Criteria a, b and c of the WMRSS Consultation Document are supported and it is considered that these criterion should be included in a revised policy.

Criterion d of the WMRSS Consultation Document is questioned as it is unclear how recognising the role of the West Midlands Brownfield Land Working Group in the policy will deliver the intention of the policy. It is unclear how the mention of this group will be applicable to District and Borough Councils and also what type of land is being discussed.

Criterion e of the WMRSS Consultation Document is questioned. A clear definition and purpose of a Brownfield Land Action Plan / Previously Developed Land strategy would be needed to ensure that both such a document is meaningful and to guide development to the most appropriate locations. The definition of 'significant' would also need to be clearly defined to ensure that areas that require such plans are aware of the need to develop them and are clear on their content and purpose.

Criterion f of the WMRSS Consultation Document is questioned; again, it is unclear why the Centre of Excellence for Land Reclamation should be specifically mentioned in a policy and what the purpose of this would be. It is important to get the context correct in which the Centre of Excellence is mentioned to ensure that their role is used as a tool for delivery.

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

None

> **Question ENV2: Which Option on page 65 would you prefer Policy QE2 to follow, and why?**
>
> **Please tick one box**
>
> ✓ **Option 1: Needs Led**
> O **Option 2: Growth Led**
> O **Option 3: Competitiveness Led**
>
> **Please provide reasons for your answer.**

The Phase II Revision of the RSS has given Redditch the designation of Settlement of Significant Development (SSD). Redditch Borough Council strongly opposes this designation principally on the basis that the amount of development allocated to Redditch is catering only for natural growth.

It is considered that if the designation of SSD remains in place, then Option 2 would be supported. However, if, as is preferable, this designation is removed, then Option 1 would appear the most appropriate approach, despite there being potential reiterations of national planning policy in PPS3.

It is considered that with regard to Option 1 the premise of the policy is to target communities in need, this classification would require clearer definition, for example what constitutes 'need' and how is it to be identified? It is unclear how an 'improvement in the attractiveness of disadvantaged areas' would be achieved. It is also unclear how 'accessible local greenspace' would be delivered. One of the implications of this Option may be to increase the proportion of development required as urban extensions. Redditch Borough is constrained by its boundaries and there are other physical constraints which affect the capacity of being able to accommodate an urban extension. It is considered that any additional growth would therefore need to be located in the Green Belt. It has already been established, through evidence presented at the WMRSS Phase II Revision that Redditch Borough Council considers it inappropriate to develop in its Green Belt. This approach is not advocated as the most sustainable way to deal with restoring degraded areas and managing and creating high quality new environments. Rather the focus should be on restoring areas that are currently degraded within the urban area. Despite the preference of this option against the other suggestions in the Phase III review, the factors outlined above severely impair Option 1 and as such it is not supported by Redditch Borough Council.

With regard to Option 3, it is considered that this approach 'may not contribute so significantly to the conservation and enhancement of biodiversity or the provision of accessible local greenspace'. This is considered to be a significant reason to discount this Option entirely, in line with national planning policy.

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

Please tick one box   O Yes   ✓ No

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

None.

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

Please provide reasons for your answer.

Option (a) would ensure that the amount of brownfield land development would be delivered in proportion to the amount of new development. It is considered that a phasing policy would ensure delivery of development on previously developed land. This method of using brownfield land already exists and therefore does not appear to be a significant change, therefore could be easily implanted with least disruption.

Option (b) is very unclear about the aims of the Brownfield Land Action Plans (as stated in the response to ENV1); therefore it is difficult to support this approach.

With regard to Option (c) it is unclear how this approach would be achieved, for example how would increasing the amount of greenspace and enhancing biodiversity increase the attractiveness to developers who would essentially want to develop the site. Enhancing it as open space would discourage development on the site.

Other comments on restoring degraded areas and managing and creating high quality new environments

The draft Historic Environment Strategy does not appear to be available and

therefore its implications on the Phase III cannot be addressed.

Page 64 states that *"there is the potential that this irreplaceable resource may come under further pressure particularly in areas designated for significant housing growth."* It should be noted that pressure does not only come from residential development, but also from all other forms of development as well as from changes to the environment.

Page 64 also details the need for the WMRSS to identify areas where improvements to the urban and rural environment and townscape are needed. It is not clear where this has been addressed and where the locations are that require improvement.

Policy QE4 – Greenery, Urban Green Space and Public Spaces

> **Question ENV5: Do you agree with the list of issues a – f on page 67 that it is suggested Policy QE4 could include?**
>
> **Please tick one box ✓ Yes O No**
>
> **Are there any suggested issues which a revised Policy QE4 should not include? If so, please tell us why you think these issues should be excluded.**

The general contents of a new policy appear correct and fit for purpose. Point (c) is questioned on the basis of whether it would be repeating national planning policy and if it is really necessary within the content of the Policy. It may be more appropriate to detail the benefits of Green Infrastructure within the preamble to the Policy rather than as Policy wording.

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

None.

Policy QE5 – Protection and Enhancement of the Historic Environment

> **Question ENV6: Do you agree with the list of issues a – j on page 68 that it is suggested Policy QE5 could include?**
>
> **Please tick one box** ✓ **Yes** O **No**
>
> **Are there any suggested issues which a revised Policy QE5 should not include? If so, please tell us why you think these issues should be excluded.**

It should be noted in reference to point (a) of the WMRSS Consultation Document that although the objectives of PPG15 are fully supported, it can be considered that the historic environment is evolving and this should be kept in mind.

With regard to Point (b) of the WMRSS Consultation Document it is unclear as to the purpose of consulting with the local community to determine those undesignated aspects of the historic environment that they value, if no further form of designation or protection can be offered.

Point (d) of the WMRSS Consultation Document is supported if it is made explicit how the regionally distinctive aspects of the region's historic environment will be reviewed and the purpose of this review. Please find attached the Redditch Borough Local Distinctiveness document which may supplement any future review. This document considers the most distinctive features of Redditch Borough.

It should be noted, with regard to Point (h) of the WMRSS Consultation Document that other things pressure the historic environment not just pressure from change, for example risks from climate change such as flooding place a strain on the historic environment.

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

It is unclear what is meant in (b) of the WMRSS Consultation Document by the "undesignated historic environment" and in what context 'historic' is being used,

is this referring to ancient/scheduled monuments, if not where is it defined?

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

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

Please tick one box   ✓ Yes   O No

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

It is difficult to agree with the suggested list until all the requirements are identified.

It is unclear where the action plans identified in point (a) of the WMRSS Consultation Document would sit with regard to the LDF.

With regard to point (i) of the WMRSS Consultation Document, this may be outside the remit of the planning system and would require a lot of joined-up working.

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

It is not clear what the potential influence or duties the European Landscape Convention will place on Redditch Borough in terms of policy and resource implications.

It is considered that point i) of the current Policy QE6 should be maintained, this states that "a consistent approach is taken to landscape and character issues, particularly where they cross local planning authority boundaries". This is important guidance for Local Authorities when producing joint DPDs, for example Area Action Plans.

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

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

Please tick one box

O Agree with proposed targets

O Disagree with proposed targets

If you disagree, please provide reasons for your answer.

No view on this matter.

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

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

Please tick one box   O Yes   O No

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

More guidance would be needed on point (d) of the WMRSS Consultation Document which would require local opportunity maps to be developed as part of the Local Development Framework.

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

Option 2 promotes the enhancement of specific Biodiversity Enhancement Areas (BEA), this is the first reference to these areas and there is no definition provided. A clear definition of the BEA would be beneficial.

> **Question ENV10: Should the focus of Policy QE7 be mainly on the existing Biodiversity Enhancement Areas, or alternatively those areas identified in the Regional Opportunities Map (on page 72), and why?**
>
> **Please tick one box**
>
> **✓ Existing Biodiversity Enhancement Areas**
>
> **O Areas identified in Regional Opportunities Map**
>
> **Please provide reasons for your answer**

This Option ensures delivery in committed areas. The Biodiversity Enhancement Areas are already established and work has commenced as part of Local Development Frameworks (LDFs) to achieve targets and therefore incorporation into policy would have minimal impact.

It would be beneficial to have a map showing the BEA areas, this would allow for cross-reference between the two maps to identify the difference in the areas.

Policy QE8 – Forestry and Woodlands

> **Question ENV11: Do you agree with the list of issues a – i on page 73 that it is suggested Policy QE8 could include?**
>
> **Please tick one box   ✓ Yes   O No**
>
> **Are there any suggested issues which a revised Policy QE8 should not include? If so, please tell us why do you think they should be excluded.**

It is considered that issues (f) and (g) of the WMRSS Consultation Document would be difficult to implement. In particular point (f) of the WMRSS Consultation Document is a very locally specific issue that would have to be considered on its individual merits. It is unclear how this would be relevant on a regional scale.

With regard to point (f) of the WMRSS Consultation Document this would also be difficult to implement regionally.

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

None.

Protection of Agricultural Land

> **Question ENV12: Do you agree with the list of issues a – f on page 74 that it is suggested that the text relating to the Protection of Agricultural Land could include?**
>
> **Please tick one box**
>
> ✔ **Yes**
>
> **O No**
>
> **Are there any suggested issues which revised text for Protection of Agricultural Land should not include?**
> **If so, please tell us why you think these issues should be excluded.**

Point (a) of the WMRSS Consultation Document suggests that the quality of agricultural land is very important, however the policy does not go on to detail how the quality will be improved through the WMRSS. This could also be said about point (d) of the WMRSS Consultation Document which suggests that local sourcing of food and energy crops should be encouraged. It is also unclear how point (e) of the WMRSS Consultation Document will be implemented.

> **Are there any additional issues which you think revised text on the Protection of Agricultural Land should include?**
>
> **If so, please tell us what issues you think should be included and why.**

None.

Policy QE9 – The Water Environment

> **Question ENV13: Do you agree with the list of issues a – i on page 75 that it is suggested Policy QE9 could include?**
>
> **Please tick one box   O Yes   O No**
>
> **Are there any suggested issues which a revised Policy QE9 should not include? If so, please tell us why you think these issues should be excluded.**

With regard to point (a) of the WMRSS Consultation Document it is considered that there should be clear guidance on the applicability of the European Water Framework Directive.

With regard to point (c) of the WMRSS Consultation Document this information can be supplemented with the information collected at the local level.

It is considered that point (g) of the WMRSS Consultation Document is unrealistic as the implications of the RSS Phase II Revision cannot be managed to achieve this.

There should be a regional overview that considers the impacts downstream from flood management systems, ensuring that flood management techniques do not impact other areas.

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

None.

Air Quality

> **Question ENV14: Do you agree with the list of issues a – d on page 76 that could be included in text relating to Air Quality?**
>
> **Please tick one box   ✓ Yes   O No**
>
> **Are there any suggested issues that you think should not be included in revised text for Air Quality? If so, please tell us why you think these issues should be excluded.**

It is considered that Air Quality Management Areas should not be detailed within the WMRSS as these can change over the plan period.

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

The policy could require the preparation of Air Quality Strategies and management of Air Quality Management Areas.

Integrated Approach to the Management of Environmental Resources

> **Question ENV15: Do you agree with the list of issues a – i on page 79 that it is suggested Policy QE1 could include?**
>
> **Please tick one box   ✓ Yes   O No**
>
> **Are there any suggested issues which a revised Policy QE1 should not include? If so, please tell us why you think these issues should be excluded.**

It is not clear what the 'etc' in point (b) of the WMRSS Consultation Document is referring to i.e. which aspects should also be linked back to Phase One and Two.

Point (c) of the WMRSS Consultation Document is strongly supported and it is considered that a positive enhancement and net environmental gain should be incorporated in a final policy.

It is considered that point (d) of the WMRSS Consultation Document may be in danger of repeating national planning policy.

Point (f) of the WMRSS Consultation Document makes reference to the need to target resources according to designations, for example SSDs or MUAs. Designations should be irrelevant when it comes to conserving and enhancing the environment and all areas should be treated equally.

Point (g) of the WMRSS Consultation Document covers a wide range of issues that all need consideration, it is considered that this point is very complex and needs breaking down to ensure each issue is sufficiently addressed.

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

None.

> **Question ENV16: Which Option on page 79 would you prefer Policy QE1 to follow, and why?**
>
> **Please tick one box**
> ✓ **Option 1: Environment Led**
> ✓ **Option 2: Development Led**
> O **Option 3: Spatial Strategy**
> **Please provide reasons for your answer.**

The Phase II Revision of the RSS has given Redditch the designation of SSD. Redditch Borough Council strongly opposes this designation principally on the basis that the amount of development allocated to Redditch is catering only for natural growth.

It is considered that if the designation of SSD remains in place then Option 2 would be supported. This Option can be implemented by Districts through the use of County Council Landscape Character Assessment guidance.

If the SSD designation is removed, then Option 1 is supported as there are areas of poor environmental quality outside of the Major Urban Areas and

Regeneration Zones that need to be addressed. This should be on a needs-led basis.

An appropriate response would be one which takes all three of these into account.

Flood Risk

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

Please tick one box   ✓ Yes   O No

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

Generally agree with the list of items a new policy could include; however there are concerns over a number of the criteria.

It is considered that criterion (a) of the WMRSS Consultation Document would be unnecessary as this repeats national planning policy in particular the provision of PPS 25.

Criterion b, d, e, f, g, k, l of the WMRSS Consultation Document are supported as they address the current issues in the region related to flooding.

There are strong concerns over the responsibility of implementing criterion c, h, i and j of the WMRSS Consultation Document. In particular point h appears to have no clear way of delivery. Redditch Borough Council further consulted with the Environment Agency about how this could be achieved, however they could not provide further clarity.

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

None.

Energy

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

Please tick one box ✓ **Yes** O **No**

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

Without this policy, the Government's objectives under the Climate Change Act (2008) will almost certainly not be realised. Currently also out for consultation, the DECC's draft Heat and Energy Savings Strategy identifies retrofitting of existing domestic dwellings as a key method in which to increase thermal efficiency within the existing housing stock and suggests that existing homes may all need to be carbon-neutral dwellings in the future. However, shorter term ambitions of this strategy include:

"Our proposal is that, by 2015, all lofts and cavity walls should be insulated, where it is practical to do so. By 2020, we want seven million homes to have had the opportunity to take up a 'whole-house' package of measures going beyond simple insulation. By 2030, our aim is that all buildings will have received such a package, that covers all of the cost-effective measures available for that property at the time."

  (**Source***: http://hes.decc.gov.uk/consultation/chapter-1/, accessed 20th July 09)*

It is considered that a regional strategy should mirror the national strategy as there does not appear to be any regional variances within the existing dwelling stock locally which would conflict with national objectives.

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

Please tick one box

O Option 1: Adopt national target for renewable energy
O Option 2: Adopt Regional Energy Strategy targets for renewable energy
✓ Option 3: Sub-regional targets for renewable energy

Please provide reasons for your answer.

The physical make up of the WM region does not lend itself equitably to national targets relating to generation of renewable electrical energy generation. There is little point in focussing large amounts of money and resources in inappropriate areas in order to try and meet unrealistic, blanket targets (in particular there are specific concerns about the suitability of wind generated energy, and development of a local, sustainable biomass/bio-fuel supply network requires time to become established).

Sub-regional targets are supported as the preferred option; however, this should not be used as an excuse not to adopt similar, ambitious targets at or above national aspirations. However, it is considered that sub-regional planning authorities have a better and more detailed appraisal of what is feasible.

There are a number of social (e.g. energy security) and economic (e.g. developing local green industry) benefits from increasing the amount of locally available renewable energy sources and ambitious targets should be considered an opportunity for investment rather than a threat to be negotiated to minimal levels.

With regard to Option 3, it is not clear whether the sub-regional target would be set by the Regional Spatial Strategy or left to the Local Authorities. It is also unclear when the assessment for the potential of renewable energy opportunities and constraints would be conducted and who would complete this.

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

Please tick one box   O Yes   ✓ No

Please provide reasons for your answer.

As in Q19, it is considered that this approach may be too prescriptive and would not allow for the most suitable technological solution for a given area to be implemented. A more detailed assessment would be required of sub-regional capacities if this were to be agreed as the way forward.

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

Please tick one box

O Option 1: Retain existing Policy EN1
✓ Option 2: Criteria-based policy to ensure that renewable energy is appropriately located

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

It is considered that clear criteria is essential to achieving 'buy in' from those investing in the technology e.g. architects, large scale developers, industry direction and investment in this field, across the region. This will also assist public understanding of the rationale behind locational decisions, with potential for less opposition during the planning process.

It is also considered that LPAs need clear guidance on what is being sought to achieve and how quickly. It would also inform LDF preparation. If the criteria are to be included it in the LDF, then a regional steer is needed to ensure it can be implemented within a local context. Option 2 also ensures Local Development Frameworks do not repeat these provisions. It is considered Option 2 would be a suitable approach that could be made regionally distinctive.

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

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

Contribution to the global environment

Contribution to the local economy

Impact of fauna, flora and animal life

Noise

Odour

Traffic Implications

Visual Impact

Other factor(s) (please specify below)

4 Contribution to the global environment

3 Contribution to the local economy

3 Impact of fauna, flora and animal life

4 Noise

3 Odour

3 Traffic Implications

4 Visual Impact

It is also considered that a policy framework is necessary for ensuring that development proposals effectively consider these issues.

Other comments relating to the Energy Section

Page 86, paragraph 1 – this paragraph has regard to the fact that low carbon technologies should be promoted, subject to appropriate environmental and social safeguards. This paragraph fails to mention the need for economic safeguards. If the technology is economically unviable then it will not be implemented.

Page 86, paragraph 2 – this paragraph clearly states that the Phase III revision does not include a review of issues relating to fossil fuels, however it is not made clear where this review will take place. Fossil fuels are the main source of energy currently in the region and therefore are incredibly important. For this reason, their use and importance should be reviewed to reflect the necessity in using and promoting renewable energy.

Page 86, under paragraph 4, the first point states to *"cut the UK's CO2 emissions by 60% by 2050, with real progress by 2020."* It is not clear if there will be a regional target to meet this national goal.

Page 87, paragraph 4 states the national target for generating electricity from renewable sources is 10% by 2010 and 15.5% by 2015. Paragraphs 5 and 6 go on to say that the West Midlands Regional Energy Strategy targets are 5% by 2010, rising to 10% by 2020. It is unclear why the regional target is significantly lower than the national target and how this will achieve the aspirational national target. This is discussed further under the options for renewable energy generation; however the national target should have some weight in the final decision.

Page 88, paragraph 9 states the importance of retrofitting renewable energy systems to existing buildings, while this is true and is needed in the region, it is unclear exactly what the regional measures are and how they will be delivered. Communication that Redditch Borough Council has had with the Environment Agency has not clarified how this can successfully be achieved. This point is again mentioned on page 89, paragraph 4, which states that *"energy efficiency in existing buildings is very important but cannot be implemented through the WMRSS."* This conflicts with comments on the previous page which states that there is potential for retrofitting and that it might be possible to encourage the retrofitting of energy efficiency measures to existing buildings.

Positive Uses of the Green Belt

Question ENV23: Should the WMRSS develop a policy to secure positive use and improvements of the Green Belt and urban fringe (Option 1), or rely on the guidance in national Green Belt policy (PPG2) and the environmental enhancement policies (Option 2), and why?

Please tick one box

O Option 1: Develop a Regionally Specific Green Belt Policy
✓ Option 2: Apply PPG2

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

It is considered that Green Belt issues would have been ideally reviewed through the WMRSS Phase II Revision, as the implications from Phase II significantly affect the Green Belt. Although Green Belt boundaries are not being reviewed through this revision, the role and use of the Green Belt is in jeopardy following the Phase II Review.

With regard to Option 1 it is considered that it may be too late to effectively implement this Option. It is also unclear how it would be decided where improvement should take place. As each Green Belt is different in all areas, it is unclear how this policy would be tailored to different areas.

Minerals

Safeguarding Mineral Resources

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

Please tick one box

✓ **Option 1: Safeguard Key Minerals and Infrastructure**
O **Option 2: Safeguard All Minerals and Key Infrastructure**

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

Option 1 seems the most appropriate as it prioritises important minerals, which ensures delivery.

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

Please tick one box   O Yes   O No

If yes, please provide reasons for your answer.

No view on this matter.

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

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

Please tick one box   O Yes   O No

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

No view on this matter.

If no, please give reasons for your views.

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

Non–Mineral Development in a MCA comprising more than:
5000 sq metres for offices/retail/tourist/leisure/development
2 hectares for any Use Class B1, B2, B8
1 hectare for any residential development

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

No view on this matter.

> **Question M5: What minerals related infrastructure should be safeguarded in the Region? These could be for example:**
> - **Sites / facilities for concrete batching**
> - **the manufacture of coated materials**
> - **other concrete products**
> - **the handling, processing and distribution of substitute, recycled and secondary aggregate material using local rivers, inland waterways and rail.**
>
> **Please state your reasons and provide evidence to support your view. Please provide a list of key sites/facilities that should be safeguarded.**

No view on this matter.

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

No view on this matter.

> **Question M6: Do you think that minerals resources should be safeguarded in areas covered by national designations for landscape, wildlife conservation and cultural heritage?**
>
> **Please tick one box**
>
> ✓ **Minerals resources should be safeguarded in designated areas**
> O **Minerals resources should not be safeguarded in designated areas**
>
> **Please provide reasons and where possible provide evidence for your answer.**

Safeguarding minerals ensures delivery.

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

Please tick one box   O Yes   O No

If yes, what matters should the policy address?

No view on this matter.

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

Please tick one box   O Yes   O No

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

No view on this matter.

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

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

Future Supplies of Construction Aggregates

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

Please tick one box   O Yes   O No

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

No view on this matter.

> **Question M10: Which of the three Options on page 109 do you think would provide both an adequate and sustainable supply of aggregates up to 2026 in the West Midlands?**
>
> **Please tick one box**
>
> **O Option 1: Apportion future supplies by existing methods**
> **O Option 2: Apportion future supplies using different sub regions**
> **O Option 3: Apportion future supplies using different sub regions and methods**
>
> **Please provide reasons (and where possible, evidence) for your answer.**

No view on this matter.

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

No view on this matter.

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

No view on this matter.

> **Question M12: Do you think that the provision of future supplies of aggregates in the Region can be determined by applying one of more of the following policies, provisions or concepts? Please tick the relevant boxes and give reasons for your choices.**
>
> **O Future Patterns of Housing and Employment growth**
> **O Existing Mineral Infrastructure**
> **O Local Resource Availability**
> **O Environmental Acceptability and Designations**
> **O None of the above**
> **O Other (please specify)**
>
> **Please provide reasons (and where possible, evidence) for your answer.**

No view on this matter.

> **Question M13: Do you agree with the Section 4(4) Authorities that the sub regions set out on page 106 are the most appropriate for carrying out any future sub regional apportionment of aggregates in the West Midlands?**
>
> **Please tick one box   O Existing Sub-Regions   O   Sub-Regions Proposed by Section 4(4) Authorities**
>
> **Please provide reasons for your answer.**

No view on this matter.

Future Brick Clay Provision

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

No view on this matter.

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

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

Please tick one box

O Option 1: Regional Supply Requirement
O Option 2: Supplies for Individual Brickworks
O Option 3: Future Supplies from Resource Areas

Please provide reasons for your answer.

No view on this matter.

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

Please tick one box   O Yes   O No

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

No view on this matter.

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

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

O Proximity to brick clay supplies
O Proximity to existing brickworks
O Good access to road/rail
O Proximity to existing/future markets
O Long term accessibility
O Locations where it is possible to minimise/avoid significant environmental impacts
O Other (please specify)

No view on this matter.