

Consultation Questions on : Spatial Options - Housing

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
HOUSING PROVISION		
<p>H1: What overall level of new housing development do you think is appropriate to plan for across the Region?</p>	<p>The three options provide for differing levels of projected demand across the Region ranging from 381,000 to 575,000 dwellings over the period 2001 – 2026. Option 3 provides for 575,000 and is derived from the 2003 – based household projections. These show a 447,400 increase in households to which is added 111,100 to provide replacement homes for those expected to be demolished and an additional provision of 3% vacancy allowance for new dwellings.</p> <p>Of the 447,400 household increase, approximately 400,000 is due to natural change. However, if the household representation rates (i.e. the propensity of individuals to form new households at any point in time) remained unchanged from 1996 based projections, then the scale of the increase would be reduced by about 100,000 households. The adjustments to the representation rates are based on trends and are generally sensitive to economic factors including performance of the economy interest rates, and the affordability of housing relative to incomes.</p> <p>The provision for international migration into the West Midlands is based on a continuation of recent trends of net inward migration of around 11,000 persons pa. However, no allowance is included for the potential impact of migration from Eastern Europe post the May 2004 enlargements to the EU.</p>	<p>The preferred option should aim to provide sufficient housing to meet the latest assessments of need. However, the RSS should not just follow a predict and provide approach full account needs to be taken of the environmental capacity of the Region such that it may not be acceptable to achieve total provision.</p> <p>Assumptions underpinning the projections should be subjected to regular monitoring and where necessary review. In particular, regard should be had to the impacts of recent inward migration arising from EU enlargement.</p> <p>Careful phasing of Greenfield land releases will be needed to ensure that the key objective of RSS in securing the urban regeneration of the MUAs is not undermined.</p>

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	<p>The Government is seeking to boost the numbers of new homes built and therefore support the full provision of 575,000. However, Planning should not just follow a 'predict and provide' approach the decision as to overall level of provision should balance the overall environmental impact of such development on the critical assets of the Region.</p> <p>The assumptions underpinning the projections should be subject to regular monitoring and review. Careful phasing of Greenfield land releases will be needed to ensure that the key objective of RSS in securing the urban regeneration of the Major Urban Areas is not undermined.</p>	
H2: Can you suggest another level?	See comments above	
H3: For each of the Options do you think that the balance of development between the MUAs and other areas is acceptable?	<p>The balance of development between the MUAs and other areas ranges from 53% MUA/47% other areas under option 1, to 50%/50% under option 3. When compared with the pre 2001 balance of 33%/67% all of the options represent a major shift in the pattern of housing development within the Region and reflect the thrust of the current RSS Strategy to significantly reduce out migration from the conurbation.</p>	<p>All three options represent a significant shift in emphasis in the balance of development in favour of the MUAs when compared with pre 2001 rates.</p> <p>When considering the balance issue, the objective should be to seek the maximum level within the MUAs commensurate with the environmental capacity of the MUAs to accommodate growth without undermining their Urban Renaissance.</p>

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<p>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?</p>	<p>The figures set out in the Consultation document refer to gross dwelling completions rather than just the net additions to the housing stock after allowing for losses from demolition. If the net completions balance was considered it would be nearer 40% MUAs 60% other areas, which reflects that most of the losses from demolitions are projected to occur within the MUAs.</p> <p>The views of the Home Builders Federation in response to this question will be important.</p> <p>Option 3 (575,000 dwellings) requires an annual build rate of 24,100 dwellings post 2006. Compared with the 2001 – 2005 rate of 17,370, and a 1996 – 2001 rate of 17,000, this would represent nearly a 40% increase in the annual build rate across the Region. Achieving such an increase will be a significant challenge and will undoubtedly take at least five years or more. Aside from increasing the capacity of the house building industry, it will take several years for the completion of Local Development Frameworks identifying growth locations and the required sites. Provision of the necessary infrastructure will also take further time and will not only depend on the capacity of the construction industry but also on the availability of funding.</p>	<p>For all three options the balance in growth MUAs/other areas would not undermine the fundamental change in direction set out in the RSS.</p> <p>Option 3 requires a very substantial increase in house building rates across the Region when compared with rates of the last 10 years.</p> <p>Aside from increasing the capacity of the house building industry (which will clearly take a number of years) it will also take several years for the completion of Local Development Frameworks identifying growth locations and the required sites. Provision of the necessary infrastructure will also take further time and will not only depend on the capacity of the construction industry, but also on the availability of funding.</p>

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H5: What measures could be included in WMRSS policy to minimise these impacts?	See recommend response.	It is important that the RSS recognises the challenge of increasing housing completions and includes appropriate housing trajectory policies which take account of what can be realistically achieved, particularly within the short term and for those areas facing substantial increases. It is also vital that the RSS Phase 2 revision is submitted and adopted in accordance with the published timetable in order to provide the clear Regional Framework for the preparation of District LDFs as soon as possible.
H6: Table One and Table Two on page 24+25 show new housing development across all local authorities in the Region. What do you think about the overall balance of proposals under each of the Options?	Please see paragraphs 4.6 – 4.13 of main report.	<p>Both Options 2 and 3 allocate significant levels of housing growth to Worcester in recognition of its role as a sub-regional foci.</p> <p>Whilst the concept of developing the sub-regional foci is supported there needs to be careful consideration of the potential capacity of these centres in order to ensure the delivery of sustainable communities.</p> <p>The scale of provision at Worcester is expected to require substantial infrastructure provision and will require proper planning through the LDF process and this should be reflected in appropriate housing trajectory policies.</p>
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.	Please see paragraphs 4.14 – 4.23 of main report	Although the provision of 4,700 dwellings for Wyre Forest District, under Options 2 and 3 is sufficient in theory to meet local needs and is in line with the RSS objective of restricting out migration from the conurbation to adjacent shire towns, such an allocation would not fully utilise the potential urban brownfield capacity of the District to 2026.

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		<p>The level of completions, committed sites, and future brownfield urban capacity is assessed at 5,700 dwellings up to 2026. There would therefore be scope for the District's allocation to increase by 1,000 dwellings to 5,700 dwellings in order to utilise this potential capacity. This would have a number of benefits, firstly it would have the potential to reduce greenfield development elsewhere in Worcestershire, secondly it would provide greater scope for the continuing regeneration of key parts of the towns of Kidderminster and Stourport on Severn, and thirdly it would provide potentially significant opportunities to secure additional affordable housing provision to meet identified needs.</p> <p>However, this additional growth needs to be supported by appropriate infrastructure, e.g. highways, drainage, community facilities, etc</p> <p>Taken overall an additional 1,000 dwellings for the District appropriately phased would be unlikely to critically undermine the existing RSS Strategy of reducing out migration from the conurbation and would, at least in part, contribute towards meeting potential market demand.</p>
<p>H8: In particular, do you think that Burton upon Trent should be a foci settlement, accommodating significant development on greenfield land?</p>	<p>Although it is clear that Burton upon Trent has considerable potential to perform as a sub-regional foci the environmental impact issues are matters for local consideration.</p>	<p>No comment</p>

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H9: Do you think that the currently identified sub-regional foci of Worcester, Telford, Shrewsbury, Hereford and Rugby should fulfil this role, accommodating significant development on greenfield land?	These sub-regional foci have a vital role to play in achieving the current RSS Strategy and ensuring the development of self-contained sustainable communities.	Yes. But see also question H6 response.
AFFORDABLE HOUSING & HOUSING MIX		
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?	Policy as set out in PPS3 is that Local Development Documents should set out the likely proportions of households that require market or affordable housing. This needs to be based on a Strategic Housing Market Assessment for the area. LDDs should also set an overall target for the total amount of affordable housing to be provided. This should reflect local variations in factors such as economic viability of land and levels of available finance. RSSs should set out the affordable housing target for the region and each housing market area.	In order to accord with PPS3 (para 28) the RSS should set out the affordable housing target for the region and each housing market area.
H11: What would the implications be of having a District level affordable housing target (as a minima) in the WMRSS?	<p>In order to arrive at a robust minimum target for the amount of affordable housing to be provided on a District by District basis, it would be necessary to have regard to likely economic viability of sites and the availability of finance.</p> <p>There may be some limited value in identifying an indicative minimum target based on projected needs.</p>	In the light of the PPS3 advice it is clear that LDDs should set out the overall target for affordable housing for the plan area. There may be some scope for inclusion of minimum indicative District targets in the RSS.
H12: Do you have any other ideas on how levels of affordable housing delivery can be better directed by the WMRSS?	Please see paragraphs 4.25 – 4.27 of main report	See response to question H.14

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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?	Please see paragraphs 4.25 – 4.27 of main report.	The south Housing Market Assessment provides the most up to date assessment of future potential affordable housing supply for the southern part of the Region.
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?	Please see paragraphs 4.28 – 4.30 of main report.	In the light of the findings from the South Housing Market Assessment which identified high levels of need for affordable housing throughout the SHM Area, including Wyre Forest, the RSS should include a policy to facilitate the consideration of such lower thresholds, and a range of percentage rates, including 100% affordable allocations, during the preparation of LDDs for the SHM Area.
H15: Do you have any robust evidence on an appropriate housing mix within new developments that are needed in different parts of the Region?	Please see paragraphs 4.25 – 4.31 of main report	See response to Question H.14
MANAGING HOUSING DEVELOPMENT		
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?	As outlined under question H6 above the early release of land at Worcester and for similar reasons at other settlements, may be problematic with the need to put in place the LDFs and secure infrastructure provision. In addition early release of Greenfield sites at these locations must not undermine the delivery of brownfield sites elsewhere, particularly within the MUAs.	In view of the need to prepare the LDFs and secure infrastructure provision early release of significant amounts of land at those locations may not be readily achievable. There is also a danger that early release of Greenfield sites at these locations could undermine the delivery of brownfield sites elsewhere particularly within the MUAs, this would need to be carefully monitored and controlled.

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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?	<p>The current RSS Strategy is not intended to follow a Predict and Provide approach to the distribution of housing provision.</p> <p>If housing provision figures are not subject to a cap in areas of high demand then the RSS Spatial Strategy for the distribution of housing will over time be undermined. The most appropriate way to consider future demand issues is by way of regular monitoring and if necessary review of the RSS.</p>	Maxima targets for areas of high demand should be retained in order to avoid undermining the RSS Strategy. The most appropriate way to consider future demand pressures is by way of regular monitoring and if necessary review of the RSS.
H18: Do you think the use of minima targets for the MUAs is still appropriate?	Minima targets for the MUAs were included in the RSS in order to ensure that if additional brownfield capacity became available it could be readily utilised thus reinforcing the balance of development towards the MUAs.	Minima targets for the MUAs should be retained in order to ensure that if additional brownfield capacity becomes available it can be readily utilised thus reinforcing the balance of development towards the MUAs.

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EMPLOYMENT LAND		
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.	See recommendation	Employment land is an important element in the land use make-up of the Region and for the achievement of sustainable communities. General guidance on the scale of provision should be included within the RSS.
E2: If the amount of employment land requirements is included, should it be broken down to Strategic Authority or district levels?	See recommendation	Employment land provision should be broken down to District levels, as with the abolition of Structure Plans, there is no formal mechanism to subdivide a County-wide requirement amongst constituent Districts.
E3: Do you agree with the principle of a reservoir of employment land?	See recommendation	The concept of a reservoir of employment land is an acceptable approach to ensuring the ongoing supply of suitable and available sites. There may be some difficulties in maintaining an ongoing supply, particularly the need to have a future land bank of sites awaiting development and arrangements to trigger releases.
E4: What period of time should the reservoir cover?	See recommendation	The reservoir should cover a 5 year time period.
E5: Should employment land requirements in the MUAs be identified as maximum or minimum figures? i.e. should the reservoir figures identified in Table Three on page 38, act as maximum or minimum figures.	In order to ensure the delivery of the policy objectives of RSS in focusing employment development within the MUAs minimum provision figures are appropriate.	Employment land requirements for the MUAs should be minimum figures.
E6: Outside of the MUAs should employment land figures be identified as maximum or minimum figures?	Provided the figures for employment land requirements outside the MUAs are reasonable, and are sufficient to meet the needs of the local area the figures should be regarded as maximum.	Employment land requirements outside the MUAs should be maximum figures.

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E7: Should employment land requirements set out in Table Three on page 38, be adjusted to take account of:	<p>The employment land requirements are based on past take up rates. Some account will need to be taken of significant growth point proposals in order to achieve a balance of housing and employment provision.</p> <p>An allowance should also be included for waste management facilities which will increasingly require employment land sites.</p> <p>Regard should also be had to employment need and the role of small sites.</p>	Employment land requirements should be adjusted to take account of:
Number and type of households		Yes - particularly in growth point areas
Anticipated changes in past trends		Yes - use latest available data
Labour supply growth		
Population		
The need to provide a portfolio of employment sites		
Increased need for waste management facilities, see waste Options.		Yes - expected to apply in all areas
Areas of deprivation and employment need		Yes - need to support local Regeneration Areas identified in Policy UR2
Other Suggestions		Yes - small scale sites – (Need to recognise the importance of these sites in some areas)

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<p>E8: Do you have any comments on Table Three? 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.</p>	<p>Please see paragraphs 3.36 – 3.44 of main report</p>	<p>The requirements for Wyre Forest District to maintain a reservoir of approximately 3 hectares of readily available land with an indicative overall total provision of some 15 hectares up to 2026 would severely undermine the regeneration of the District's employment structure over the next 20 years. The current RSS identifies Kidderminster as a Local Regeneration Area. This reflects the problems in terms of the historic employment structure of the area being dependant upon the carpet industry and other declining manufacturing sectors.</p> <p>In order to support the economic regeneration of District it is vital that opportunities to recycle brownfield land to provide new employment sites are not unreasonably restricted. The total employment land stock of the District is about 300 hectares and to restrict the redevelopment of suitable brownfield sites for new employment uses to just 15 hectares over the next 20 years, will not facilitate the ongoing regeneration of the area. Instead it would be likely to lead to increased levels of out commuting from the District and a potential stagnation or decline in the economic well-being of the area.</p>

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		<p>Employment land completion figures given for Wyre Forest District in the 10 year period 1995 – 2004 by the WMRA are 4.7 hectares. These figures exclude small sites of less than 1 hectare pre 2002 and sites of less than 1 acre post 2002. For Districts such as Wyre Forest where the emphasis has been on small site completions these figures are somewhat misleading. The District Council monitoring records show a total of 13.9 hectares of employment land completions for all sites in the 10 years 1996 – 2006. Applying the WMRA method based on these figures would lead to a reservoir requirement of 7 hectares and a total overall requirement in the range of 30 – 45 hectares.</p> <p>When using trend based projections care is needed to avoid possible distortions arising from particular factors. In relation to Wyre Forest, past take up rates have undoubtedly been affected by a number of larger sites not being readily available due to landowner issues, and in relation to the former British Sugar site, the complexity of achieving brownfield site redevelopment. However, over the last two years there have been a number of positive indicators that the District's take-up will significantly increase in the years ahead. These include a start to construction at the 'Finpoint' development (6.2has) at a key gateway into Kidderminster on the Stourport Road Employment Corridor.</p>

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		<p>Looking at future employment provision in the District it should be recognised that the office sector is not strongly represented and it may not perform as well as more favoured parts of the Region. In addition, unlike many other parts of the Region, the District is unlikely to directly benefit from the development of, or proximity to, a new Major or Regional Investment Site, or Regional Logistics Site.</p> <p>In view of the above factors it is considered that overall provision for the District 2001 – 2026 should be in the range of 40 -50 hectares to allow for the long term regeneration of the area in accordance with the existing RSS policy.</p>

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PROTECTION OF EMPLOYMENT LAND		
PEL1: Should the WMRSS give more guidance on the need to retain employment sites which can contribute to the portfolio of employment land?	The retention of existing employment sites which form part of an areas portfolio of sites is an important issue. Advice in PPS3 that authorities should consider the re-allocation of industrial and commercial sites to housing coupled with the higher land values associated with residential development means that there is considerable pressure from landowners to switch sites from employment use. Although some re-allocations will be encouraged as part of the urban regeneration process an appropriate balance needs to be struck. In view of the importance of the employment land base to the Regional economy an overarching policy providing some guidance for LDFs should be included.	In view of the importance of a portfolio of employment land to the economy of the Region and the pressures exerted from the higher residential land values guidance should be included for LDFs on the need to retain a suitable portfolio of employment sites.
PEL2: Should the WMRSS identify the need to protect waste management sites from competing uses?	Worcestershire County Council in their submitted Waste Core Strategy are not proposing to identify specific waste management sites in subsequent DPDs. Instead they are identifying general employment land as potentially suitable locations, subject to certain safeguards.	Where sites are identified through Waste DPDs these should be protected from competing uses through appropriate policies. Guidance on the Regional approach could be usefully included in the RSS.

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REGIONAL INVESTMENT SITES		
RIS1: Do we fill the gaps in the provision of RIS?	The requirements regarding the provision of Regional Investment Sites are set out in Policy PA7 and relates to the high technology corridors/Regeneration zones i.e. areas outside Wyre Forest. Whilst in principle further provision would be desirable in terms of the Regional economy the environmental implications of potential sites need to be fully considered.	Yes in principle, subject to the availability of environmentally acceptable sites.
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.	See Recommendation	Any site selection process should be informed by sub-regional studies of the options for each corridor or zones. Any proposals should be brought forward through the LDF process.
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.	Currently Policy PA7 allows BI office developments on RIS. In future major office developments should be targeted more towards Strategic Centres to encourage more sustainable travel patterns.	Restrictions on the scale of office developments should be imposed in order to encourage such developments to locate in Strategic Centres, in order to reduce travel impacts.
MAJOR INVESTMENT SITES		
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.	Major Investment Sites are intended to be reserved for a large single user. Identification of suitable sites within the Region has proved very difficult. In addition if major investors fail to materialise, sites with potential to accommodate other forms of desirable employment development are effectively sterilised.	No comments
MIS2: If no, what are the options for additional provision?	N/A	N/A

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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?	See comments above under MIS1	Where sites have been identified and no single user is forthcoming within say 3-5 years the policy should allow flexibility for multi user development.
REGIONAL LOGISTICS SITES		
RL1: Significant growth in logistic provision in the Region is anticipated. Should part of this growth be accommodated on RLS?	Regional Logistics Sites require excellent ready access to the Regional rail and highway networks. Regional studies have identified a number of preferred locations generally to the north and east of the conurbation. Worcestershire is not identified as a potential area. RIS provide the scale of development necessary to justify access to the Regional rail network and the scope for intermodal operations.	Yes in order to secure the benefits of inter modal operations.
RL2: If yes, how many RLS are needed?	Numbers of future RLS should not be predetermined without consideration of the availability of suitable sites within the broad areas identified under Policy RL5.	No comments
RL3: The Stage Two study recommends criteria for RLS. Do you agree?	The eight criteria listed appear to cover the key site location considerations.	Agree with criteria listed.
RL4: Is North Staffordshire still an appropriate location for RLS provision?	This is an issue for North Staffordshire authorities to consider.	No comment
RL5: Do you agree that the four identified areas are the best broad locations for RLS provision?	The four board locations identified would appear the most appropriate for further detailed site investigations.	Agree with the broad locations identified.

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<p>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.</p>	<p>No comment</p>	<p>No comment</p>
<p>STRATEGIC CENTRES</p>		
<p>SC1: Do you have any comments on these levels of provision?</p>	<p>The 'up to 20k sq m' of net additional comparison floorspace for Kidderminster provides for a degree of flexibility in the context of local circumstances and more detailed research. However, the recent White Young Green Wyre Forest Retail & Leisure Study provides a range at 2021 of need between 4,000 to 36,000 sqm net additional comparison floorspace with the best estimate being 20,300 sqm net. This is only slightly above the 20k suggested in the Phase Two options.</p> <p>Whilst it is recognised that the Black County centres have been considered separately through Phase One, it would be helpful if the four centres were included in the tables with the other 21 regional centres. The options provided in relation to SC3 are unclear in their approach towards the four Black Country authorities i.e. it is not clear which centres fall into which category (tier 1, tier 2 etc).</p>	<p>Broadly supportive of the suggested levels of provision. However, would like to see the following minor amendments for clarification:</p> <ul style="list-style-type: none"> i) Inclusion of the Black Country Centres in to the table; ii) Use of consistent measures of floorspace in all tables i.e. net floorspace; iii) A qualifying statement to confirm that the floorspace provisions relate only to the 'Strategic Centre' and not to any other non-strategic centres within a host urban area and; iv) Guidance on provision to 2026.

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	It might be worth making clear that this figure relates only to the Strategic 'Centre' and not to other local centres (non-strategic) within the corresponding urban area. It is noted that the figures only cover the period to 2021 and will presumably need to provide guidance up to 2026.	
SC2: Do you have any comments on the assumptions included in the Regional Centres Study?	No comments on the specific assumptions referenced in the options document but recognise the many assumptions contained in the background study some of which are understood to be ambitious e.g. regarding raising spend capacity in the Black Country Core Catchment Area. White Young Green in their methodology for the Wyre Forest Retail & Leisure Study have questioned the assumption in the Centres Study concerning Special Forms of Trading i.e. they consider longer term projections for Internet Sales to be unreliable. Figures will need reworking in the light of final housing distribution preferred option. They will also need to be kept under regular review in light of uncertainties over the underlying assumptions.	Would anticipate the assumptions regarding household projections to be revised in line with emerging RSS proposals.
SC3: Do you have any comments on the suggested thresholds for referral to the RPB?	Broadly supportive of the suggested thresholds but would like further clarification as to how this would be applied to the Black Country centres.	Broadly supportive but seek clarification regarding the conformity protocol to be applied for the Black Country Centres.

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<p>SC4: Should an upper limit for development in non-strategic centres be introduced in order to protect the role of the strategic centres?</p>	<p>It has to be recognised that the scale and definition of these non-strategic 'centres' i.e. 'District*' and 'Local*' Centres may differ between the MUA's where some 'local centres' may themselves support a significant catchment area and shire towns where catchment areas for such centres might be more tightly defined.</p> <p>Agree that it is appropriate for the RSS to provide an upper limit for non strategic centre, although as for the strategic centres this may differ according to the size of the urban area/ catchment served. The prospect of providing an across the board upper limit of 10-15,000 sqm of comparison floorspace is unlikely to provide a satisfactory response as this might equate to total growth envisaged for the tier 4-5 Strategic Centres and would be inappropriate in those smaller urban settings.</p> <p>Need to clarify that the references are to 'comparison' retail and not convenience which is often the mainstay of lower order centres</p> <p><small>*As defined in Annex A of PPS6.</small></p>	<p>If thresholds are to be meaningfully applied, there is a need to differentiate between the different types of non-strategic centres. Perhaps the PPS6 typologies could be used as a starting point i.e. for LDF authorities to define non-strategic 'Town, District and Local Centres' and for reasonable thresholds to be applied accordingly.</p> <p>It needs to be made clear that the floorspace figures concern comparison shopping.</p>
<p>SC5 Do you think that WMRSS policies should give priority to centres where people currently travel away for retail and leisure?</p>	<p>Would support this approach in particular circumstances and depending on defined catchment area dynamics for example. This approach is consistent with the concept of a polycentric network of complimentary centres.</p>	<p>Would support this proposition where there is a realistic prospect of the host Strategic Centre retaining a greater proportion of its lost expenditure and subject to the centres' relative role in the network.</p>

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SC6: Do you think that WMRSS policy should support this regeneration approach?	Generally support the concept subject to realistic prospects.	Unequivocally, but retail development is not likely to be the only regeneration driver. In considering retail floorspace regard will need to be given to the issues raised in response to question SC5 (above).
SC7: Do you think that WMRSS policy should support this market led/opportunity approach?	As above this would depend on the catchment setting and possible implications on other complementary centres within the network i.e. ensuring that one Strategic Centre does not benefit at the cost of a neighbouring Centre.	In relation to SC5-7 would suggest that it may not be desirable to have a 'one size fits all' policy approach and would prefer regard to be had to the catchment dynamics and recognition of the polycentricity and complementarity of centres.
OFFICES		
O1: Do you have any comments on Table Four that will help the RPB to develop an office provision policy?	When looking at future employment provision in the Wyre Forest District it should be recognised that the office sector is not strongly represented and is unlikely to perform as well as more favoured parts of the Region. This gap is highlighted in Table Four with higher provision in the centres that are particularly attractive to the office sector e.g. Birmingham (480-530k sq m), Coventry (140-160k) and Solihull (100k) compared to lower tier centres such as Kidderminster (30k). It is noted that there is a very ambitious agenda for the Black Country with each of the four centres earmarked for 186k sq m.	Broadly support the proposed distribution of office space but suggest further clarification could be offered on the balance between 'strategic centre' and LA total floorspace figures i.e. is the remainder out-of-centre?

Consultation Questions on : Spatial Options - Employment

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
	<p>There would appear to be an underlying assumption in Table Four that the balance between each 'LA total' and 'strategic centre provision' is largely based on out-of-centre provision. It is unclear what, if any, implication this may have on the application of the PPS6 sequential approach test, but in this respect the very clear approach taken by the Black Country Phase One submission i.e. to separately identify provision to be met outside the 'strategic centres', may have some attraction.</p> <p>The District Council in partnership with AWM, GOWM and the Worcestershire County Council is looking to progress an ambitious regeneration programme which focuses on diversifying the economic base towards high technology and the knowledge based economy. Therefore, it is welcome that the regional centres study identifies significant scope for additional office space (30,000sq m) in Kidderminster.</p> <p>A joint study is due to be commissioned with Worcestershire County Council and Advantage West Midlands to look in more detail at the prospects of Kidderminster delivering higher quality employment opportunities in support of proposals for the former British Sugar site.</p>	
<p>O2: Do you think the Centres Study has identified the right levels of additional office floorspace/development?</p>	<p>Given that the economy is in a state of continual flux, it is perhaps difficult to gauge. The levels are ambitious (certainly for Kidderminster) and this reflects the District Council's ambitions to regenerate and diversify the economic base of the town. All in all the figure seem about right.</p>	<p>Broadly support the proposed levels of floorspace.</p>

Consultation Questions on : Spatial Options - Employment

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
O3: If no, do you have any robust evidence that can support your comment and the development of the Preferred Option?	N/A	N/A
O4: Do you think this sequential approach to out of centre office development is the best approach?	<p>Wyre Forest District Council is generally supportive of the PPS6 tests including the sequential approach and has applied a Policy regarding office development since the adoption of the Local Plan in 2004. However, this needs to be balanced with the need for the District and wider region to remain competitive and responsive to modern occupier demands.</p> <p>There is a significant issue here about consistency of approach at a local, sub-regional, regional and international level.</p> <p>Unlike retail, office occupiers are footloose and not drawn to a defined catchment area. The biggest single difficulty of applying a sequential approach to office premises is that if you only provide town centre sites many occupiers are likely to go to another district or region where their expectations can be met.</p>	<p>Broadly support the sequential approach to office location. However, would welcome some recognition of the different opportunities, pressures and constraints facing different centre typologies.</p> <p>Recognition of the difficulties faced by traditional manufacturing centres e.g. 'Local Regeneration Areas' in diversifying the roles of their centres and the need for 'pump priming' office schemes in highly complex town centre settings.</p>

Consultation Questions on : Spatial Options - Employment

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
	<p>However, whilst the major centres including Birmingham benefit from a certain critical mass, supporting services and entertainment facilities together with excellent public transport connections, some of the smaller Strategic Centres are likely to be constrained by their focus on meeting the needs of retail occupiers with poor public transport compounded by very limited long-stay parking.</p>	
<p>O5: Do you think WMRSS policy should set out maximum percentages for out of centre office development?</p>	<p>This may assist in providing consistency of approach across the West Midlands region. However, it also needs to be applied flexibly in the context of local circumstances. It will be important for the West Midlands region to consider its position in the context of other regions within the UK and Europe.</p>	<p>Can see both advantages and disadvantages in taking this approach. There may be concerns if an arbitrary figure is to be applied across the Region.</p>
<p>O6: If yes, what percentage would you suggest?</p>	<p>N/A</p>	<p>See above.</p>
<p>O7: Do you think that WMRSS policy should set out criteria for out of centre office development?</p>	<p>Would have a concern with some of the suggested criteria i.e. above a certain minimum floorspace or highly accessible to the highway network as justification for out-of-centre development. This seems to imply that large scale offices might be located out of centre just because they are large or that every motorway junction should become a node for offices just because it is accessible to a motorway. However, would support a clear set of criteria to be addressed in any rationale justifying a particular proposal, type or form of development and why it could not be located in-centre or edge-of-centre etc. This would seem a reasonable way of ensuring fairness and consistency of approach across the region.</p>	<p>Would broadly support this approach subject to the detailed criteria proposed.</p>

Consultation Questions on : Spatial Options - Employment

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
O8: If yes, what criteria would you suggest?	N/A	A set of tests for applicants to demonstrate why any proposal cannot be accommodated within or edge-of-centre. e.g. lack of readily available sites, site economics etc. This would effectively require prospective applicants to provide a robust justification for their out-of-centre location.
O9: Do you have any additional comments about out-of-centre office development?	N/A	N/A
REGIONAL CASINOS		
RC1: Should the guidance in the WMRSS for where Regional and large Casinos go should be based on assessing the impact on Urban Renaissance?	No comment.	No comment.
RC2: Should WMRSS policy state that large casinos should in the first instance be in town and city centres?	To be consistent with PPS6 and having regard to the commercial leisure focus of casinos and ancillary uses (town centre uses) it seems appropriate for the area of search to be limited to 'Strategic Centres'	Yes but perhaps clarify with 'Strategic Centre'.
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?	No comment.	No comment.
RC4: If yes, what criteria would you suggest?	N/A	N/A

Consultation Questions on : Spatial Options - Waste

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
MANAGING YOUR OWN WASTE		
W1: Should the WMRSS set out the principle that each Waste Planning Authority, or sub region, should manage waste; in accordance with the Waste Hierarchy, and; allocate enough land in its Local Development Documents to manage an equivalent tonnage of waste to that arising within its boundary, taking into account the appropriate growth in waste arising from the formation of new households and the diversion of Commercial and Industrial Waste from landfill?	This is essential to provide the necessary guidance to the Waste Planning Authorities in preparing their Waste LDF's.	Support for this approach.
W2: If no, suggest an alternative approach;	N/A	N/A
W3: Should the basis on which WPAs identify sites be based on safeguarding and expanding suitable sites with an existing waste management use? However they need to be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections.	As a starting point agree that this methodology has significant attraction. Amongst the environmental criteria to deliver more sustainable patterns and logistics benefits perhaps greater regard could also be had to identifying sites that are central to waste arisings.	Broadly supportive of this approach subject to certain criteria including centrality to waste arisings.

Consultation Questions on : Spatial Options - Waste

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
<p>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,</p> <ul style="list-style-type: none"> • 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 curtilage; and • Be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections? 	<p>Generally agree with the suggested criteria. However, a number of these raise similar issues to those highlighted in recent consideration of the Worcestershire County Council’s emerging proposals for the Waste Core Strategy and it is recommended that WFDC make similar responses in relation to the RSS.</p>	<p>Broadly agree with the criteria based approach, but have the following comments:</p> <ul style="list-style-type: none"> • When defining ‘good accessibility’ WPA’s should have regard to centrality of waste arisings in order to reduce the need to travel in line with PPG13; • There might be a question over the practicalities of using water and rail at a sub-regional scale; • It may be problematic to generalise about the compatibility of land uses as the relative appropriateness will depend on the nature of the operation and other material planning considerations. For example, some employment areas containing B1 land uses may neighbour residential properties. Etc. Suggest rewording to say “compatibility with existing and proposed land uses and other material considerations” and perhaps avoiding specific examples which may well depend on local circumstances.
<p>W5: If no, suggest alternative criteria below;</p>	<p>No additional comment.</p>	<p>See suggested rewording of the final criteria (above)</p>
<p>W6: Should waste management facilities be permitted on open land, including land within the Green Belt, where it is</p> <ul style="list-style-type: none"> • close to the communities producing the waste; and • where there are no alternative sites; and • where it would not harm the openness of land or the objectives of Green Belt 	<p>This is very much a last resort and the list of suggested criteria appear to reinforce this.</p>	<p>The suggested criteria appear to provide appropriate safeguards.</p>

Consultation Questions on : Spatial Options - Waste

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
MUNICIPAL WASTE		
W7: Do you have any comments on the tables on pages 59-60?	One of the issues that WFDC raised with WCC in the emerging Waste Core Strategy proposals was the lack of any clear indication of the amount of waste that the authority is planning to accommodate. It is, therefore, welcome that the RSS Phase Two provides sufficient clarity in this regard. Comments on the detailed tonnages to be accommodated within Worcestershire may well be subject to a response from the County Council but it seems sensible that these be adjusted and align with a preferred housing option.	WFDC welcome the clarification offered to the Waste Planning Authorities as a means of understanding the scale of provision to be accommodated in Waste LDF's.
COMMERCIAL AND INDUSTRIAL WASTE		
W8: Should the WMRSS policy for Commercial and Industrial Waste be based on: 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? 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?	This is a technical matter for more detailed consideration by the Worcestershire County Council as the Waste Planning Authority. As above. As above.	No Comment. No Comment No Comment

Consultation Questions on : Spatial Options - Waste

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
HAZARDOUS WASTE		
W9: Should the WMRSS include a policy which requires Waste Development Frameworks to safeguard existing sites for the treatment and management of Hazardous Waste?	As above.	No Comment
W10: If yes, should WMRSS policy state that Waste Development Frameworks in the Major Urban Areas give specific priority to identifying new sites for facilities, to store, treat, and remediate Hazardous Waste, including contaminated soils and demolition waste?	As above.	No Comment
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 encouraging the creation of protective cells in landfills for stable Hazardous Waste?	As above.	No Comment
CONSTRUCTION AND DEMOLITION WASTE		
W12: Should the WMRSS encourage greater recycling of Construction & Demolition 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?	This approach is consistent with Wyre Forest District Local Plan Policy D.6 (Safeguarding Resources By Design).	Broadly support this policy initiative subject to the location of 'urban quarries' being sensitively located.

Consultation Questions on : Spatial Options - Waste

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
LANDFILL		
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	This is a technical matter for more detailed consideration by the Worcestershire County Council as the Waste Planning Authority.	No Comment.
W14: Should the WMRSS only support the allocation of new landfill sites in Waste Development Frameworks (WDFs) 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 licence or permit from the Environment Agency?	This is a technical matter for more detailed consideration by the Worcestershire County Council as the Waste Planning Authority.	No Comment.

Consultation Questions on : Spatial Options - Waste

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
<p>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:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ effective protection of amenity and the environment; and ○ the proposed activity is appropriate to the area proposed? 	<p>Broadly support the criteria based approach to provision in rural settings.</p>	<p>Broadly support the suggested criteria based approach.</p>

Consultation Questions on : Spatial Options - Waste

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
MANAGING WASTE IN NEW 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?	This will have significant implications for the District Council in its role as the Local Planning Authority for non-waste issues. The suggested approach to require a Waste Management Plan raises a follow-up concern regarding how the plan is validated and considered and what the detailed expectations and requirements that flow from it might be. Further consideration will need to be given to the practicalities of implementing these proposals through the Development Control process.	Sufficient regard will need to be given to the practicalities of implementing this initiative in relation to all relevant planning applications submitted for development over the prescribed thresholds as this would have resource implications for all Local Planning Authorities.
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.	This would seem a pertinent requirement for Waste Management applications and would help the District Council as a consultee on a Waste matters planning application take a more informed view of the possible impact.	Broadly support the proposed approach.
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'?	This would seem like a detailed matter to be address through LDF's.	Agree with the broad principle i.e. that the RSS could include a requirement for LPA's to prepare policies to promote recycling but suggest that the detail might be more appropriately addressed through the preparation of LDF's to suit local circumstances and the needs of local waste management systems.

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
STRATEGIC PARK & RIDE		
SPR1: Do you agree that the criteria on page 73 are the right criteria?	Yes. However criteria point 2 may benefit from including “site constraints”	Amend criteria point 2, page 73 to read: ii) The environmental and traffic impacts <u>and site constraints</u> at the Park location.
SPR2: If not what else should be considered?	A key objective of Park and Ride is to minimise the length of journey made by private car and maximise the length of journey made by public transport. It is considered that this should be emphasised in the criteria so that strategic park and ride sites do not encourage car users to drive long distances to a Park and Ride Site.	Include a further criteria point as follows: <u>vi) The potential to minimise the length of journey made by private car</u>
SPR3: Do you agree that Strategic Park and Ride locations may be categorised as “Edge of Major Urban Area” and “External Town”?	Para 5.17 of the Strategic Park and Ride Study states that the ideal situation would be one in which each sector has a combination of an external town, or towns within an edge of conurbation site and a number of smaller within conurbation local sites. It is noted that “Within Conurbation” sites are not included within the spatial options document. In addition the term ‘External Town’ should be clarified to make clear that it refers to the location of the town relative to the MUA not the location of the Park and Ride facility relative to the town itself.	Strategic Park and Ride sites can be classified as ‘Edge of MUA’ and ‘External Town’ as well as ‘Within MUA’ in line with the WMRA 2003 Strategic Study. The term ‘External Town’ should be clarified, to make clear that it refers to the location of the town relative to the MUA, not the location of the Park and Ride facility relative to the town itself.
SPR4: Are the broad locations identified on page 74 the right ones, or should others be considered?	<p>The West Midlands Park and Ride Strategy Phase 2 states that Kidderminster is a low priority and that other sites within Sector B6 appear to offer a better opportunity, such as Stourbridge junction.</p> <p>The Strategy states that to take things further will require detailed assessments of each of these areas in order to make the case on an individual site basis.</p> <p>A Park and Ride site at Hartlebury Station should be considered. This was raised as an</p>	<p>Suggest that a park and ride site at Hartlebury Rail Station is also considered for evaluation as a potential location.</p> <p>Noted that Kidderminster is identified as a low priority option in the WM Park and Ride Strategy Phase 2 Report 2003. In the absence of detailed site assessments the locations identified should be regarded as potential examples rather than firm proposals. It is considered that strategic P&R sites involving the construction of new stations should</p>

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
	<p>issue during the Strategic Park and Ride study scoping work. This site has the potential to serve Stourport-on-Severn – a relatively affluent area with high car ownership levels, conducive to a rail based P&R scheme. In addition, the existing platform length is good and there is some infrastructure already in place.</p> <p>It is considered that strategic P&R sites involving the construction of new stations should be developed only in areas where alternative options have been thoroughly examined and ruled out.</p>	<p>be developed only in areas where alternative options have been thoroughly examined and ruled out.</p>
<p>SPR5: Do you agree that the “Target Destinations” within the Region are the Centres identified in WMRSS Policy PA11?</p>	<p>Birmingham International Airport should be included as a target destination. Forecast passenger growth is a key issue for BIA and this will have huge implications for surface access from its catchment area.</p>	<p>Include Birmingham International Airport and the NEC, under target destinations.</p>
<p>SPR6: Is London the only “Target Destination” outside the Region that should be accessed by Strategic Park and Ride or are there others?</p>	<p>The following are potential target destinations: Milton Keynes, Oxford and Reading (from the South of the region), Bristol and Cardiff (from South West), Manchester & Airport (from North West) and Derby & Leicester from the East of the WM region.</p>	<p>Consideration of other target destinations could include Milton Keynes, Oxford and Reading (from the South of the region), Bristol and Cardiff (from South West), Manchester & Airport (from North West) and Derby & Leicester from the East of the WM region.</p>
<p>SPR7: Are there opportunities for Strategic Park and Ride in the West Midlands to provide access to “Target Destinations” outside of the Region?</p>	<p>As above.</p>	<p>No comments</p>
<p>SPR 8: Which of the three approaches (Criteria Based, Location or Target Destinations) do you feel would best provide the guidance needed and why?</p>	<p>All three have some merit with particular support for the criteria based approach and ‘target destinations’. The Criteria Based approach appears to be the most practical and holistic.</p>	<p>The Criteria Based and ‘Target Destinations’ approaches will provide the best guidance.</p>

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
	<p>Target destinations provides a strategic rationale and critical mass to sustain higher frequency services.</p> <p>Please see comments set out above in relation to SPR4. The West Midlands Park and Ride Strategy Phase 2 states that in order to take things further a detailed assessment will be required in each of the areas to make a case on an individual site basis.</p>	
CAR PARKING STANDARDS		
<p>PS1: Does the West Midlands need to have regionally specific parking standards that are different to those set out in the national guidelines?</p>	<p>Parking standards are a key differential and can significantly influence demand e.g. out-of-centre business parks with plentiful free parking versus heavily constrained town centre sites with expensive and often limited off-site long-stay parking provision. This needs to be rightly balanced against high public transport accessibility (and the prospects of achieving better public transport services in the future). Given the different characteristics of centres it may not be appropriate to have a one size fits all approach as currently in PPG13. Therefore, some additional guidance and clarification at a regional level that provides a more level playing field and reflects the 'centres' strategy would be welcome. However, there needs to be scope for flexibility to enable LDF's to have sufficient regard to local circumstances.</p>	<p>Some additional guidance and clarification at a regional level that provides a more level playing field and reflects the 'centres' strategy would be welcome. However, there needs to be scope for flexibility to enable LDF's to have sufficient regard to local circumstances.</p>

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
PS2: Should regional parking standards be identified for land uses not included in national guidelines (PPG13: Transport) and if so which?	It is not considered that standards should be set for shared parking facilities. Instead these require a formal parking assessment which is undertaken as part of the Transport Assessment. The timing of trips to the proposed developments would need to be taken into account in order to avoid over provision of car parking.	It is not considered that standards should be set for shared parking facilities. Instead these require a formal parking assessment which is undertaken as part of the Transport Assessment.
PS3: Should some parking standards only be defined in Local Development Frameworks, and if so which?	There should be scope for parking standards to be refined at a local level through the LDF process to ensure that appropriate regard can be had to local circumstances.	There should be scope for parking standards to be refined at a local level through the LDF process to ensure that appropriate regard can be had to local circumstances.
PS4: Do you agree with these suggested criteria on page 76?	It is considered that walking and cycling should also be included under criteria 1, the accessibility of the site.	Amend Criteria 1 to read as follows: “How accessible the site is by public transport, walking and cycling.”
PS5: Should any other criteria be considered?	The key criteria are identified.	No
PS6: Do you agree with the principle of dividing the Region into settlement types?	See recommended response.	Broadly support the overall ambition. In general this clearer classification in the Options Paper is more satisfactory than that set out in the Parking Standards Study. However, as currently worded it is unclear which centres are included in each classification. There are likely to be major differences between large centres in the MUAs and other large centres in terms of public transport accessibility. Also potential issues over dealing with proposals for suburban employment, services and housing schemes.
PS7: Do you agree with the definitions of the settlement types on page 76?	See recommended response.	No. Would prefer to see these realigned with the centres definitions i.e. tiers 1-5. It also needs to be clear which definition applies to any given centre.

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
PS8: Do you agree with the 50% and 20% reductions?	See recommended response.	In working through the implications of applying a 'settlements characteristics' approach, regard needs to be had to the local context and differences between centres. Broadly support this although site specifics will play a major role and 20% reduction may prove too restrictive in certain circumstances, particularly in light of the criteria set out at page 76.
PS9: Do you agree with the Local Accessibility approach on page 77?	See recommended response.	Broadly support this although the limitations of this approach should be recognised. There are frequent changes in the timetabling of bus and rail services and all data should be kept up to date. It is also important to incorporate accessibility on foot and by bicycle into this approach as all journeys by public transport end in a walk or trip by bicycle. It should also be recognised that the suggested approach could incentivise development in less sustainable out-of-centre locations i.e. poor public transport access results in a higher parking allowance that is more attractive to certain occupiers. Policy safeguards may be needed to prevent this from happening.
PS10: Do you agree with the 50% and 20% reductions?	See recommended response.	Broadly agree with the principle but subject to concerns over the need to consider local characteristics... please refer to comments above in relation to PS8.

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
PS11: Do you agree with this Site Specific Accessibility approach on page 77?	See recommended response.	Broadly agree. WFDC has used the Accession Model in its approach towards seeking developer contributions to sustainable transport. However, the limitations of the Accession Model are currently very apparent. In particular there are issues relating to accuracy. Site specific levels of accessibility can be masked by this Accession mapping approach. As mentioned in response to PS9 there is a risk of incentivising development in unsustainable locations for certain types of development.
PS12: Do you agree that site specific considerations should result in a 50% or 20% reduction in provision?	See recommended response	Consider that for sites with average journey times that the 50% standard is too restrictive. Average journey time is not a particularly good indicator and is open to wide interpretation. It is considered that this should be given further thought. As mentioned in response to PS9 there is a risk of incentivising development in unsustainable locations for certain types of development.
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?	Current RSS Policy T8 states that further guidance should be developed for inclusion in the RSS Review to ensure a consistent approach across the Region to the introduction of road user charging schemes.	Pending the announcement of future Government Policy on this issue the main elements of Policy T.8 should remain unchanged.
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?	The Government's Report into the Feasibility of Road Pricing in the UK (2004) concluded that if the government wants to implement road pricing it will have to take the lead on this issue with regard to setting the standards. It may therefore be appropriate to change the policy to refer to the national scheme.	In the light of the conclusions of the Governments Road Pricing Report (2004) it may be appropriate to amend the policy to refer to a potential national scheme as an option.

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
ROLE OF AIRPORTS		
A1: Do you have any comments on the suggested policy revision outlined on page 81?	The Government's White Paper sets out a clear role for BIA, but is less specific about the long term potential for other airports within the Region. It concluded that the Government's preferred location for a new runway to meet future growth in passenger demand in the Midlands is at Birmingham. Therefore, support this policy revision and its clear definition of the roles for the region's airports.	Support the proposed Policy T11 revision particularly the limitation for Wolverhampton Business Airport to a continuation of its current role of serving business and general aviation.
A2: What surface access modal split targets should be included in the WMRSS?	See recommended response.	The District Council notes that the RSS Phase 2 Review is intended to incorporate the land use and surface access implications arising from the Air Transport White Paper. It is difficult to quantify surface access modal split targets without the support of an adequate evidence base. The District Council considers that detailed and current assessments should be undertaken in relation to surface access to the Region's airports. This could then be fed into the Airport Development Document proposed under A5 below.

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
A3: Do you agree with the roles described on page 82 for each airport?	<p>The role of Wolverhampton Business Airport is described as 'continuing its role of providing business and general aviation.</p> <p>Wyre Forest District Council policy (July 2003 CM102) is to oppose expansion of the airport, including any broadening of its role.</p>	<p>Yes. These roles comply with the Government's conclusions set out in the Air Transport White Paper. The District Council considers that surface access links to the Wolverhampton Business Airport would not be conducive to delivering commercial services even on a limited scale. Furthermore the Council is opposed to expansion of the airport because it could potentially cause the following:</p>
		<ul style="list-style-type: none"> i) Cause very serious environmental damage within North Worcestershire ii) Have severe impact on the quality of life of residents in the Wyre Forest District iii) Require massive investment in infrastructure which would result in irreversible changes to the environment. iv) Destroy the integrity of the green belt between Wyre Forest and the western part of the West Midland conurbation.
A4: Is the requirement for an 'Airport Development Document' an appropriate policy to include in the WMRSS?	<p>South Staffs District Council has commenced work on a detailed Area Action Plan (AAP) for the Wolverhampton Business Airport site as part of the LDF process. The preparation of a document by the airport operator setting out their aspirations for their future operation and development could help to inform the AAP.</p>	<p>Yes. It is considered that this would constitute a more integrated approach and would provide local authorities with more opportunities for involvement. It would then form part of the evidence to assist in the development of appropriate policies in the LDFs and LTPs.</p>
A5: If an 'Airport Development Document' policy is not supported, then how else can the WMRSS manage the wider impacts of airport development?	N/A. Please see above.	N/A

Consultation Questions on : Spatial Options – Transport and Accessibility

Regional Spatial Strategy Spatial Options Questions	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council Response
A6: Should the WMRSS include policies to deal with airport related cross-boundary planning issues?	See recommended response.	This would need to be subject to a detailed evidence based approach, particularly in relation to surface access issues.