

Chapter 2 : Towards a More Sustainable Region (Policies SR1 – SR4)

Regional Spatial Strategy Phase Two Submission Proposals	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council response
<p>Policy SR1 Climate Change Paragraphs 2.15 – 2.21 (Pages 19 – 21)</p>	<p>Policies SR1 – SR4 are new policies which were not included within the original Options Consultation. Policy SR1 is in part a response to the emerging guidance on Planning and Climate change which was finally published in December 2007 as a Supplement to Planning Policy Statement 1 (after the Preferred Option was approved for submission). As such, there are a number of issues that will need addressing including targets etc. These issues undoubtedly will be raised by other key stakeholders.</p>	<p>No comments.</p>
<p>Policy SR2 Creating Sustainable Communities Paragraphs 2.22 – 2.25 (Pages 22 – 23)</p>	<p>This new policy outlines the key elements required to contribute towards a sustainable community.</p> <p>Whilst the thrust of the policy is worthy of support it is not clear how it is developing, rather than repeating, national planning guidance.</p>	<p>No comments.</p>

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<p>Policy SR3 Sustainable Design and Construction Paragraphs 2.26 – 2.30 (Pages 24 -26)</p>	<p>This new policy seeks to raise the environmental quality of new development in terms of referring to achieving different codes and standards. Similar issues will need to be considered in more detail as part of the development of Local Development Frameworks.</p>	<p>No comments.</p>
<p>Policy SR4 Improving Air Quality for Sensitive Eco system Paragraphs 2.31 – 2.33 (Pages 27 – 28)</p>	<p>This new policy relates to European Sites of importance for biodiversity which are under threat from air pollution. There are however no sites within or close to Wyre Forest District.</p>	<p>No comments.</p>

Chapter 6 : Communities for the Future (Policies CF1 – CF10)

Regional Spatial Strategy Phase Two Submission Proposals	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council response
<p>Policy CF1 Housing within the major Urban Areas Paragraphs 6.7 – 6.17 (Pages 69 – 72)</p>	<p>This policy covers the Black Country, Birmingham, Coventry and the North Staffordshire Conurbation. It seeks to retain the economically active population in the area through the provision of sufficient housing balanced with employment provision and environmental enhancements. For the Black Country (including Dudley) the pattern of development has been established through the adopted Phase 1 Revision which seeks to concentrate development within and adjacent to the four strategic centres (including Brierley Hill/Merry Hill) and no peripheral urban extensions are proposed in the period to 2026.</p>	<p>Support Policy CF1 (Housing within the Major Urban Areas)</p>
<p>Policy CF2 Housing beyond Major Urban Areas Paragraphs 6.18 – 6.21 (Pages 72 – 73)</p>	<p>This policy sets out the proposal to concentrate growth within 10 settlements of Significant Development which are seen as capable of accommodating large scale development in a balanced and sustainable way.</p>	<p>Support Policy CF2 (Housing beyond Major Urban Areas)</p>

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	<p>In Worcestershire, Worcester and Redditch are identified. The former is an obvious choice given its County town and sub regional role with a good range of higher order services. Redditch is perhaps less established, but given its location immediately south of Birmingham with the potential for improved rail services and its proximity to the M42 /M40 corridor it has the necessary potential characteristics.</p> <p>Beyond these growth settlements, small scale development is expected to be accommodated within and adjacent to other urban areas and market towns.</p> <p>Village development is intended to provide for local needs affordable housing, promote regeneration and support ongoing provision of local services. Priority for development should be brownfield land and conversions within villages with a good range of existing facilities. Thus in rural areas the majority of development should be focused on market towns and larger villages.</p>	

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<p>Policy CF3 Level and Distribution of New Housing Development Paragraphs 6.22 – 6.29 (Pages 73 – 76)</p>	<p>This is the critical policy in terms of setting out the overall level and distribution of housing provision. Table 1 provides a breakdown of net provision (i.e. total completions less losses arising from demolitions) to District Level for 2006 – 2026.</p> <p>Cross boundary provisions arising from potential urban extensions are also outlined.</p> <p>Total provision across the Region is 365,000 with 3,400 for Wyre Forest District.</p> <p>For further comment please see main committee report paragraphs 3.1 – 3.7.</p>	<p>Strong support Policy CF3 (Level and Distribution of New Housing) both in terms of the total level of provision within the Region to 2026, the strategy for distribution and the scale of provision for Wyre Forest District at 3,400 dwellings.</p>
<p>Policy CF4 Phasing of New Development Paragraphs 6.30 – 6.35 (Pages 76 – 79)</p>	<p>This policy provides a broad phasing of development up to and beyond 2016 with the emphasis on boosting completion rates early on, particularly within the Major Urban Areas.</p> <p>Priority is to be given to regeneration sites with greenfield and Green Belt sites only brought forward when there is a clear need for such sites releases.</p> <p>Although increasing provision to 2016 should be supported delivery will be difficult in the light of current market conditions.</p>	<p>Support Policy CF4 (Phasing of New Development) subject to concerns regarding the early delivery of increased provision due to current market conditions.</p>

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<p>Policy CF5 The Re-use of Land and Buildings for Housing Paragraphs 6.36 – 6.39 (Page 80)</p>	<p>An overall regional minimum target of 70% of completions on brownfield land is set out with higher levels in the two conurbations.</p> <p>The policy also prioritises the development of brownfield land before greenfield allocations are released.</p> <p>Note: for Wyre Forest District with provision at 3,400 dwellings a high level of brownfield completions should be achievable, even potentially higher than the 83% rate achieved during the last 10 years.</p>	<p>Support Policy CF5 (Re-use of land and building for housing)</p>
<p>Policy CF6 Making Efficient Use of Land Paragraphs 6.40 – 6.42 (Page 81)</p>	<p>This policy confirms the need for LDFs to include appropriate density policies which seek to provide high density development in and adjacent to strategic town centres (which includes Kidderminster) and key transport interchanges.</p> <p>Paragraph 6.42 includes an important caveat to ensure a mix of provision in Strategic Town Centres.</p>	<p>Support Policy CF6 (Making Efficient use of land) and in particular the reference in paragraph 6.42 to the need for a mix of provision to include accommodation for families.</p>
<p>Policy CF7 Delivering Affordable Housing Paragraphs 6.43 – 6.52 (Pages 81 – 84)</p>	<p>This policy sets out the approach to the provision of affordable housing and outlines requirements for LDFs in part restating advice in PPS3. A minimum target of 6,000 dwellings per annum (gross) for the Region and 1,000 dwelling pa for the South Housing Market Area (SHMA) are given.</p>	<p>The overall approach of Policy CF7 (Delivery affordable housing) be supported subject to consideration being given to raising the affordable housing targets to take more account of the recent Strategic Housing market Assessments.</p>

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	<p>Although the significant shortage of affordable housing is acknowledged in the accompanying supporting text the proposed targets particularly for the SHMA appear too low when measured against the findings of the recent SHMA Strategic Housing Market Assessment.</p>	
<p>Policy CF8 Delivery Mixed Communities Paragraphs 6.53 – 6.59 (Pages 84 – 86)</p>	<p>This policy seeks to ensure LDFs provided an appropriate mix of housing provision to meet emerging needs. As such it reflects advice in PPS3.</p>	<p>No comments</p>
<p>Policy CF9 Gypsies and Travellers Paragraph 6.60 (Page 86)</p>	<p>This policy remains unchanged from the adopted RSS and will be the subject of Phase 3 Revision proposals.</p>	<p>No comments</p>
<p>Policy CF10 Managing Housing Land Supply Paragraphs 6.61 – 6.68 (Pages 86 -87)</p>	<p>This policy requires LDFs to include measures to manage the release of housing sites to deliver the other RSS policies. Of particular importance is the reference to having regard to the future potential of windfall site development when identifying sites to meet the required ten year trajectory of housing provision. Whilst this approach may appear to conflict with PPS3 advice the regional significance of this issue is clearly set out in the supporting text with for example over 70% of new capacity arising in 2005/06 coming from windfalls.</p>	<p>Strongly support Policy CF10 (Managing housing land supply) particularly Clause B ii) and the importance of taking full account of windfall capacity in preparing LDFs and site allocations, in the light of the particular circumstances applying within the West Midlands Region and the ongoing potential to contribute towards delivering sustainable development patterns.</p>

Chapter 7 : Prosperity for All (Policies PA1 – PA10)

Regional Spatial Strategy Phase Two Submission Proposals	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council response
<p>Policy PA1 Prosperity for All Paragraphs 7.1 – 7.9 (Pages 90 – 92)</p>	<p>This policy sets out the overarching approach to employment development across the region. It remains largely unchanged from the existing RSS with only relatively minor updates to refer to the role of settlements of Significant Development, the rural areas, sustainable development.</p>	<p>PA1 (Prosperity for All) policy amendments be supported.</p>
<p>Policy PA2 Urban Regeneration Zones Policy PA3 High Technology Corridors Policy PA4 Development related to Higher/Future Education Policy PA5 Employment Areas in Need of Modernisation and Renewal</p>	<p>This group of policies are either unchanged from the existing RSS or subject to only minor drafting amendments to reflect more substantive changes made to other policies.</p>	<p>No comments.</p>
<p>Policy PA6 Portfolio of Employment Land and Premises Paragraphs 7.30 – 7.35 (Pages 96 – 97)</p>	<p>This policy along with Policies PA6A and PA6B is intended to replace the existing RSS Policy PA6 (Portfolio of Employment Land).</p> <p>The policy sets out the types of sites needed to make up the Regional Portfolio including the three locally significant categories which LDFs will need to make provision for within the scale of provision set out in Policy PA6A.</p>	<p>PA6 (Portfolio of Employment land and premises). Policy amendments be supported.</p>

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	<p>The broad thrust of the policy remains unchanged and should be supported.</p>	
<p>Policy PA6A Employment Land Provision (Pages 98 - 99)</p>	<p>This policy incorporates part of the existing PA6 policy which sets out issues which Planning Authorities should consider when drawing up Employment land portfolios as part of LDFs. In addition the policy sets out indicative long term employment land requirements for each District together with a requirement for a continuing 5 year reservoir of readily available land.</p> <p>For further comments please see main committee report paragraphs 3.8 – 3.12</p>	<p>PA6A (Employment Land Provision) policy approach along with level of provision set out in Table 4 for Wyre Forest District be support.</p>
<p>Policy PA6B Protection of Employment Land and Premises (Page 100)</p>	<p>This policy is intended to replace sub paragraphs C and D of the existing PA6 policy in order to set out a Regional approach to the ongoing protection of existing employment land and premises.</p> <p>It strikes an appropriate balance between the need to consider alternative uses for obsolete sites as part of the regeneration process, whilst providing guidance on the need to maintain important employment areas for their contribution to maintaining sustainable communities into the future.</p>	<p>PA6B (Protection of Employment Land and Premises) the policy approach and revised wording be supported.</p>

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<p>Policy PA7 Regional Investment Sites Paragraphs 7.37 – 7.39 (Pages 101 – 102)</p>	<p>Minor amendments to the RIS policy are proposed including a new criteria (iv) referring to good quality public transport links. No sites are identified within or close to Wyre Forest District.</p>	<p>No comments.</p>
<p>Policy PA8 Major Investment Sites Paragraphs 7.41 – 7.43 (Page 103)</p>	<p>Minor amendments to the Major Investments Sites (for large scale single users) policy are proposed including a new criterion iv) referring to good quality public transport links. Again no sites are identified within or close to Wyre Forest.</p>	<p>No comments.</p>
<p>Policy PA9 Regional Logistics Sites Paragraphs 7.44 - 7.46 (Pages 104 - 105)</p>	<p>Minor amendments to the Regional Logistics Sites (for warehousing and distribution) policy, are proposed including an increased emphasis on the need for good access to regional rail and highway networks. No sites are identified within or close to Wyre Forest.</p>	<p>No comments.</p>
<p>Policy PA10 Tourism and Culture Paragraphs 7.47 – 7.51 (Pages 105 – 107)</p>	<p>This policy remains unchanged from the adopted RSS and will be the subject of Phase 3 Revision proposals.</p>	<p>No comments.</p>

Chapter 7 : Prosperity for All (Policies PA11 – PA13c)

Regional Spatial Strategy Phase Two Submission Proposals	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council response
<p>Policy PA11 Network of Town and City Centres Paragraphs 7.52 – 7.58 (Pages 107 - 109)</p>	<p>The proposed amendments to Policy PA11 still retain reference to the existing 25 Strategic Centres within the region. However, it is now proposed to set out a four tier hierarchy of centres which reflect current and future roles. Birmingham is the only Tier 1 centre, with Merry Hill and Wolverhampton Tier 2. Within Worcestershire, Worcester is a Tier 3 and Kidderminster and Redditch are identified as Tier 4. Paragraph 7.56 advises that the division is intended to act as a guide to the current role and status of centres. Generally it is a reasonable and logical assessment. The Divisions are reflected in future floorspace provisions contained in new Policy PA12A.</p> <p>Policy in relation to other non strategic centres is to be dealt with under a new Policy PA12B. The proposed Policy also now includes reference to Strategic Centres being the preferred location for indoor sport and leisure venues that attract large numbers of people. A further amendment seeks to reinforce the need to improve public transport access to the centres.</p> <p>Guidance in paragraph 7.57b refers to centres outside of the Major Urban Areas and</p>	<p>Support the proposed revisions to Policy PA11 and accompany explanatory paragraphs, including the identification of Kidderminster as a Tier 4 centre. Support the linkage made in paragraph 7.57 with the local regeneration areas identified in Policy UR.2.</p>

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	<p>need to support growth where required in the strategy for centres which serve Local Regeneration Areas identified in UR2 (which includes Kidderminster). A list of centres with recent poor performance is given but does not include Kidderminster.</p>	
<p>Policy PA12 Birmingham's Role as a Global City Paragraphs 7.59 – 7.61 (Pages 109 - 110)</p>	<p>Minor changes, Birmingham is now identified as a 'Global' City previously it was a 'World' City.</p>	<p>No comment</p>
<p>Policy PA12A comparison Retail Floorspace Requirements 2006-2026 Paragraphs 7.62 – 7.69 (Pages 110 – 112)</p>	<p>This new policy introduces, for the first time, a retail floorspace requirement for each of the strategic centres. Requirements are only in relation to comparison (i.e excluding convenience or food) retail and are expressed in gross floorspace (i.e. including storage etc) up to 2021 and to 2026.</p> <p>For Kidderminster a requirements of 25,000 sq.m. to 2021 and a further 10,000 sq.m. 2021 – 2026 is set out. These figures are at the lowest end of the range for Tier 4 centres.</p> <p>In order to gauge the scale of this provision in the context of Kidderminster it is worth noting that 25,000 sq.m. is approximately the size of Weavers Wharf excluding Tesco or Crossley Retail park excluding Sainsburys.</p>	<p>General support for the aim of the new policy in setting out a hierarchy of requirements across the Region. However there are some concerns that the figures may be over optimistic, particularly having regard to assumptions regarding expenditure growth and the impact of e-tailing.</p> <p>For Kidderminster, there are some concerns regarding the scale of provision to 2026 of 35,000 sq.m. Both in terms of physically finding suitable and available land for such provision, together with the potential impact on the existing centre retail businesses. Would therefore wish to see floospace figures set out to 2021 as a maximum provision which will be assessed in more detail as part of the preparation of Core Strategies and detailed district retail studies looking at the potential for specific centres.</p>

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	<p>Currently there are only limited commitments and identified sites available.</p> <p>The proposed requirements are based on West Midland Regional Centres Study undertaken by Rogers Tym and Partners which was published in 2006 and then updated in 2007 to include requirements for 2021 – 2026. The study involves modelling projected expenditure its distribution and likely future floorspace turnover rates. Like all such studies it involves a number of key assumptions. Firstly for the update study the rate of growth in comparison goods expenditure is revised to reflect actual growth in comparison goods expenditure 2001 – 2004 of 8% plus per annum per capita.</p> <p>Future expenditure is expected to grow by between 3.8 – 5.15% pa capita. This extra available expenditure is projected to support an increasing need for more comparison floorspace. However, these assumptions may be open to question particularly if there is a slowdown in the economic cycle. In addition the impact of internet shopping has been scaled back in the update study to a range of 8.7 – 12.4% at 2021, compared with the previous assumption of 20%. This contrasts with the recent continued strong growth in internet sales.</p>	<p>For the post 2021 Requirements this needs to be treated with considerable caution and the policy should refer to the LDFs having regard to the potential 2021 – 2026 needs. Such a cautious approach would be justified in view of the relatively modest levels of expenditure that have been assigned to e-tail or internet transactions in the WMRCS update report compared with the original study.</p> <p>Generally support the guidance set out in paragraph 7.68. The reference in paragraph 7.69 of the supporting text to the need to including provision for small shops and independent retailers is strongly endorsed.</p>

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	<p>In recognition of the uncertainties surrounding longer term retail projections the policy does state that planning permissions for post 2021 provision should not be granted before 2016 and that LDFs should have regard to the post 2021 requirement. Paragraph 7.67 goes further saying that the post 2021 requirement is only indicative and will be subject to revision through the RSS review process.</p> <p>As part of the LDF evidence base the Wyre Forest Retail and Leisure Study (December 2006) produced by White Young Green identified a need for approximately 20,300 sq.m. net comparison shopping floorspace to 2021. This would equate to a gross figure of approximately 27,000 sq.m.</p> <p>Paragraph 7.68 provides an element of flexibility (up to 5,000 sq.m.) in securing provision through LDF and also provides some safeguards arising from over provision adversely impacting on neighbouring centres.</p> <p>Finally, paragraph 7.69 provides a welcome recognition of the need to include a range of premises to include those suitable for small shops and independent retailers as part of future provision.</p>	

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<p>Policy PA12B Non-Strategic Centres Paragraph 7.70 – 7.74 (Page 113)</p>	<p>This is a new separate policy which expands on that previously contained with paragraph C of Policy PA11. Read in conjunction with the guidance given in paragraphs 7.72 – 7.74 it generally provides an appropriate framework for considering the future retail provision in the wide range of centres across the Region beyond the identified Strategic Centres. It would apply to centres such as Stourport on Severn, Bromsgrove and Droitwich.</p>	<p>General support for the policy and accompanying explanatory text.</p> <p>One issue of some concern is the scale of comparison retail floorspace permitted of up to 10,000 sq.m. It is not clear whether this relates to the total cumulative provision 2006 – 2026 or specific scheme proposals. For some of the smaller centres a total 10,000 sq.m. floorspace expansion would represent a substantial percentage increase, which could adversely impact on the role of nearby strategic centres.</p>
<p>Policy PA13 Out-of-Centre Retail Development Paragraphs 7.75 – 7.77 (Pages 113 – 114)</p>	<p>The proposed amendments seek to clarify that the policy applies only to comparison goods retailing and that proposals will be considered in accordance with tests as set out in the appropriate National Policy guidance.</p>	<p>Support the proposed revisions to Policy PA13 and accompanying explanatory paragraphs.</p>

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<p>Policy PA13A Office Development Requirements 2006 – 2026 Paragraphs 7.78 – 7.86 (Pages 114 – 116)</p>	<p>This is effectively a new policy which together with PA13B, will replace the existing Policy PA11 paragraph B iii). It is a significant addition for two reasons, firstly, it sets out in policy terms for the first time the scale of office development required to be provided in each of the 25 strategic centres and secondly, it provides much expanded guidance on the regional approach to the location of office development.</p> <p>Reference is made to the significant scale of out-of-centre office development in the period 2003 – 2005 and the high level of out-of-centre commitments.</p> <p>The policy seeks to shift the emphasis on future office provision to sustainable town centre and edge-of-centre locations. Consequently the scale of provision across the Strategic Centres is likely to be challenging, particularly in view of the recent trends and market pressures towards out-of-centre locations.</p>	<p>Policy PA13A sets out a requirement of 40,000 sq.m. gross office space for Kidderminster Centre from 2006 – 2026. In view of the scale of existing office provision in Kidderminster, together with the recent low rates of new development and take up, the proposed additional requirement appears to be unrealistically high. Aside from potential problems of accommodating such levels of provision in town centre or edge of town centre, locations, there is considerable doubt as to whether there is sufficient demand to deliver such provision.</p> <p>Whilst it is appreciated that in arriving at the requirements account has been taken of the need to promote diversification in areas with high manufacturing employment such as Wyre Forest District, the proposed requirement appears unrealistically high and is unlikely to be deliverable. The target should be seen as an aspiration figure which is subject to more detailed consideration and determination through the Local Development Framework.</p>

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	<p>For Kidderminster provision is to be made within or on the edge of centre for 40,000 sq.m. of office development up to 2026. For comparison purposes the Elgar House development in Green Street is approximately 3,000 sq.m. and Crown House 4,000 sq.m.</p> <p>Whilst in terms of the economic and physical regeneration of Kidderminster a very substantial expansion of new office development would be highly desirable, given the nature of the existing office market in the town it is overly optimistic and unlikely to be deliverable.</p>	
<p>Policy PA13B Large-scale Office Development outside the Strategic Centres Paragraphs 7.87 – 7.89 (Pages 116 – 117)</p>	<p>This proposed policy defines large scale office development as being 5,000 sq.m. or more, in line with the existing RSS definition.</p> <p>It sets out a number of conditions that need to be met if large scale office development is to be permitted outside of the Strategic Centres. It also helpfully states that for smaller scale proposals outside of town centres the PPS6 sequential approach should be applied and that cumulative impact of small schemes should be considered.</p> <p>Finally there is a new requirement when granting permissions for B1, B2 or B8 developments to exclude subsequent changes to B1a office use.</p>	<p>Support Policy PA13B</p>

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	Overall the policy should assist in directing future significant office developments to sustainable town centre locations particularly the strategic centres.	
Policy PA13C Regional Casinos Paragraphs 7.90 – 7.91 (Pages 117 - 118)	This is a new policy giving guidance on Regional Casinos. The policy criteria appear appropriate and reasonable.	No comments.

Chapter 9 : Transport and Accessibility (Policies T6, T7, T8, T11 and T12)

Regional Spatial Strategy Phase Two Submission Proposals	Head of Planning, Health and Environment Comments	Recommended Wyre Forest District Council response
<p>Policy T6 Strategic Park and Ride Paragraphs 9.66 – 9.76 (Pages 178 – 180)</p>	<p>The proposed policy involves a mixture of criteria, strategic locations and potential locations. The assessment criteria cover a comprehensive and appropriate range of considerations including transport and environmental impacts. The strategic locations remain unchanged from the existing RSS and include Worcester Parkway. A further nine additional potential locations are identified with none in Wyre Forest.</p>	<p>Support policy T6 (Strategic Park and Ride)</p>
<p>Policy T7 Car Parking Standards and management Paragraphs 9.77 – 9.82 (Pages 180 – 181)</p>	<p>Amendments are proposed in relation to the car parking standards element of the RSS policy. The revision requires local authorities to follow a sub-regional approach to setting maximum standards (for non residential developments) having regard to a range of appropriate considerations. This will provide the guidance for the County to prepare the necessary standards for inclusion in LDFs.</p>	<p>No comments</p>
<p>Policy T8 Demand Management Paragraphs 9.83 – 9.87 (Pages 182 – 183)</p>	<p>A number of minor amendments to the demand management policy are proposed including a recasting of the considerations regarding the introduction of local congestion charging schemes, deletion of the specific reference to Birmingham and deletion of a reference to implementing schemes before 2011</p>	<p>No comments</p>

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<p>Policy T11 Airports Paragraph 9.98 – 9.108 (Pages 188 – 190)</p>	<p>The proposed policy T11 represents a substantial redrafting of the current RSS Airports policy to reflect the 2003 Air Transport White Paper (ATWP).</p> <p>Birmingham International Airport remains the Region’s principal passenger airport and the expansion proposals should ensure increasing modal share for surface access by public transport.</p> <p>For Wolverhampton Business Airport the policy states that further development should be in accordance with the role set out in the ATWP. However the ATWP highlights the problems regarding access to the Airport and states that although the airport could be capable of delivering commercial services any decision on expansion should be a matter for decision locally.</p> <p>In view of the lack of strategic road and public transport access, together with other environmental constraints, it is considered that the RSS should provide strategic direction and restrict any further significant expansion in either the role or facilities at Wolverhampton Business Airport.</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>Objection to Policy T11 (Airports) and in particular paragraph D and the proposed policy in relation to the development of Wolverhampton Business Airport. The District Council considers that surface access links to the airport would not be conducive to delivering commercial services even on a limited scale. The RSS policy should restrict any further significant expansion of the airports role or facilities. 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.

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<p>Policy T12 Priorities for Investment Paragraphs 9.109 – 9.112 (Pages 191 – 195)</p>	<p>This policy sets out the transport investment priorities to support the economic and community growth of the region. They are grouped under three headings namely National and Regional (which includes Birmingham New Street enhancements), Sub-Regional to support Major Urban Areas (MUAs) and Sub-Regional outside MUAs. The latter category being of particular relevance for Wyre Forest.</p> <p>Generally the identified schemes or types of schemes are worthy of support. However there are two detailed points that should be raised relating to potential schemes within the district.</p> <p>Firstly under schemes providing ‘Improved access to regeneration sites’ reference in the key policy links should also include Policy PA6A (Employment Land Provision) to help deliver sub-regional employment sites such as the British Sugar site in Kidderminster.</p> <p>Secondly, in order to promote the Stourport Relief Road proposals, after ‘Improved access to regeneration sites’ add ‘including assisting the regenerating of market towns’ together with a key policy link to policy RR3 (Market Towns)</p>	<p>Policy T12 (Priorities for Investment) be supported subject to inclusion in the table sub-regional priorities outside MUAs, under schemes: ‘Improved access to regeneration sites’ the addition of ‘including assisting the regeneration of Market Towns’ and the addition of key policy links to PA6A (Employment Land Provision) and RR3 (Market Towns)</p>

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