

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

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

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

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

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

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

Your Details

Name: Ken Harrison

Job Title: Policy & Regeneration Manager

Organisation: Wyre Forest District Council

Address: Duke House, Clensmore Street, Kidderminster, Worcs. DY10 2JX.

Email: Ken.Harrison@wyreforestdc.gov.uk

The questionnaire can also be completed online. Visit the homepage of the Assembly's website at www.wmra.gov.uk for more details.

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

Mail: WMRSS Revision,
West Midlands Regional Assembly,
Albert House, Quay Place,
92-93 Edward Street,
Birmingham B1 2RA

Fax: 0121 245 0201

Email: wmrss@wmra.gov.uk

Web: www.wmra.gov.uk

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

Please tick one box O Yes O No

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

Yes. Perceptions of important and critical services are likely to vary between communities. It is considered that local determination would be more appropriate.

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

Please tick one box O Yes O No

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

Yes, more attention should be given to the needs of this group. For example, this is particularly the case where areas are poorly served by public transport and impacts on those families who may only have access to one car which is used for commuting purposes during the daytime. The question is how this may be achieved e.g. Broadband access and community transport arrangements to facilitate access to services in nearby urban centres etc.

However the needs of this group should not be seen as a priority over other areas of service deprivation. A comprehensive policy approach is required.

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

Please tick one box O Yes O No

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

No. This would not be consistent with the urban renaissance thrust of the RSS. It is apparent that the majority of services are now polarised in larger facilities and larger centres. The current supply chain system seems to rely on this model and as such it is unlikely that modest growth will itself secure local services. The scale of growth required to achieve this ambition may in all probability be too high with potential adverse sustainability consequences.

A key factor for the Phase 3 revision to consider may also be business diversification with the emergence of new rural businesses and service providers that can differentiate and diversify their offer to attract new business in new ways, rather than relying on significant population growth.

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

Please tick one box Option 1: Sustainable – Climate Change Driven
 Option 2: Community Based
 Option 3: Status Quo

Please provide reasons for your preference

Option 1. It is considered that this option would help to achieve RSS Objectives and support the emerging development strategy for the District. It also places an emphasis on improving public transport provision.

It is considered that Option 2 could prove to be resource intensive due to the need to undertake locally led reviews of service levels. It may not be practical to implement at this stage due to the stringent Local Development Framework production timescales set out in Local Development Schemes.

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

Provide a robust framework for limiting new development in the rural areas and focus new development on the Market Towns. This could then be successfully interpreted at the local level through Local Development Framework.

Gypsies and Travellers

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

Please tick one box Yes No

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

Yes, in the absence of further evidence.

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

Please tick one box Yes No

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

No comment.

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

Please tick one box Option 1 Option 2 Option 3

Please provide reasons for your preference.

Option 2. Worcestershire County has the highest proportion of local authority provision. There appears to be no justification for increasing the number of pitches for the County. Option 2 based on planning criteria, provides a more realistic pitch provision figure for the Wyre Forest District. Constraints within the District include Green Belt and flood risk zones which could impact on site specific allocations.

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

No comment.

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

Please tick one box Yes No

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

Yes, as based on the findings of the GTAA.

Gypsies and Travellers continued

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

Please tick one box O Yes O No

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

Yes, as based on the findings of the GTAA.

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

Please tick one box O Yes O No

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

No further comment.

Travelling Showpeople

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

Please tick one box O Yes O No

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

Yes, based on the findings of the GTAA.

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

Please tick one box O Option 1 O Option 2

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

Unable to make an informed comment in the absence of further evidence.

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

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

Please provide reasons for your preference.

Yes, to promote sufficient flexibility, due to the specific requirements relating to plots for travelling show people (for example larger site requirements for storage purposes); it could be harder to allocate suitable sites within individual Districts.

Question CST1: Which of the Options on page 53 do you think should be used as a basis of revising Policy PA10 Part A and why?

Please tick one box Option 1: Remove the portfolio
 Option 2: Update portfolio to include all regionally significant assets

If you have chosen Option 2, what assets (see B.O.P. report, item 11 on page 59) do you think should be added/removed and explain why you think they are or are not of regional significance.

Option 2. It is considered that overall the portfolio provides a comprehensive approach, albeit with some inconsistencies that require addressing. It should be updated in consultation with Section 4(4) authorities and Destination Worcestershire to inform the Phase 3 Revision.

However, if greater flexibility is required perhaps reference to the ‘Portfolio of Assets’ could remain in the Policy but the list could instead be included in the background text or appendices, enabling the list to be amended without needing to change the Policy?

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

Please tick one box Yes No

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

National Planning Policy framework should be sufficient here. The approach to protect as well as improve may be appropriate for natural and heritage based assets, but the numerous commercial assets will be determined by market viability and this would perhaps be beyond the scope of planning?

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

Please tick one box Option 1: Retain existing PA10 B & C
 Option 2: Update existing PA10 B & C
 Option 3: Develop a new policy in addition to PA10 B & C

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

Option 2. For example reference to sustainable transport and access would appear more consistent with the latest transport policy; quality of attractions and tourist accommodation and the vulnerability of such

cultural and tourism attractions to environmental impacts such as flooding.

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

Please tick one box Yes No

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

It is considered that more detailed consultation at the sub regional level should perhaps take place on this and that Section 4(4) authorities are best placed to comment.

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

Please tick one box Yes No

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

Yes. Particularly Option 2 on page 57. However, it is unclear how the 'strategic gaps' would practically be addressed at the regional and/or sub-regional level.

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

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

Please tick one box O Yes O No

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

Consider that criterion F could fall beyond the scope of the RSS.

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

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

Please tick one box Option 1: Needs Led
 Option 2: Growth Led
 Option 3: Competitiveness Led

Please provide reasons for your answer.

Option 3. This option appears to be the best fit with the RSS and the preferred development strategy for the Wyre Forest District - which would help to promote Kidderminster as a Local Regeneration Area.

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

Please tick one box O Yes O No

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

N/A

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

Please provide reasons for your answer.

A combination of A and B. It is considered that Brownfield Land Action Plans could help to deliver key brownfield regeneration sites. This is particularly important for area former industrial towns such as Kidderminster and Market Towns such as Stourport on Severn where there are significant brownfield opportunities on former industrial sites.

Policy QE4 – Greenery, Urban Green Space and Public Spaces

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

Please tick one box O Yes O No

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

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

Perhaps a cross reference to the role of the watercourses and waterways.

Policy QE5 – Protection and Enhancement of the Historic Environment

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

Please tick one box O Yes O No

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

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

N/A

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

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

Please tick one box O Yes O No

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

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

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

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

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

If you disagree, please provide reasons for your answer.

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

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

Please tick one box O Yes O No

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

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

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

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

Please provide reasons for your answer.

Areas identified in the Regional Opportunities Map. This would support the approach advocated for the Local Development Frameworks to identify local opportunity maps. It would also support a network of green infrastructure which is central to the regeneration strategy.

Policy QE8 – Forestry and Woodlands

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

Please tick one box O Yes O No

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

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

Pleased to note the links to climate change adaptation and links with wood fuel for heat and energy.

Protection of Agricultural Land

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

Please tick one box Yes No

Are there any suggested issues which revised text for Protection of Agricultural Land should not include?
If so, please tell us why you think these issues should be excluded.

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

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

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Policy QE9 – The Water Environment

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

Please tick one box O Yes O No

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

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

Support for a specific policy on the efficient use and management of water resources and the environment.

Air Quality

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

Please tick one box O Yes O No

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

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

Include a reference to the need for Local Development Frameworks and Local Transport Plans to address localised air quality issues.

Integrated Approach to the Management of Environmental Resources

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

Please tick one box O Yes O No

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

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

Particular support for criterion e) and emphasis on character assessment.

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

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

Please provide reasons for your answer.

Consider that Option 3 would be most likely to assist environmental improvements and the regeneration of Kidderminster. It would support the preferred options for development set out in the emerging Wyre Forest District Core Strategy.

Flood Risk

Question ENV17: Do you agree with the suggested list of issues a – 1 on page 84 that a new Flood Risk Policy could include?

Please tick one box O Yes O No

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

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

A more positive approach towards drainage capacity and the integration of SUDs into new development and transport/ highways infrastructure and also retrofitting.
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Energy

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

Please tick one box O Yes O No

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

It is unclear how this could be achieved. It is perhaps more a matter for specific Supplementary Planning Documents.
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Question ENV19: Which of the Renewable Energy Target Options do you think should be used in the WMRSS to promote the development of renewable energy and low carbon technologies in the West Midlands? (see page 90).

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

Please provide reasons for your answer.

Option 3. This would reflect sub-regional evidence perhaps produced on a more detailed basis. This could promote a more proactive approach at the local level, particularly to small scale renewable technologies. Sub regional targets could usefully provide an indication as to which technologies could

contribute towards the target. Care would need to be taken to avoid locational disadvantage and this approach would rely on the production of a very strong evidence base.

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

Please tick one box O Yes O No

Please provide reasons for your answer.

Yes, although it is considered that these should be disaggregated to the sub regional level, to reflect a more localised evidence base. For example, Worcestershire County Council has commissioned consultants to undertake a preliminary audit of the potential for renewable energy generation within Worcestershire.

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

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

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

PPS 22 advocates that criteria based policies should be set out in Regional Spatial Strategies. This can then be used as a basis for Local Planning Authorities to develop more specific criteria to reflect local circumstances within their Local Development Frameworks.

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

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

Contribution to the global environment

Contribution to the local economy

Impact of fauna, flora and animal life

Noise

Odour

Traffic Implications

Visual Impact

Other factor(s) (please specify below)

N/A.

Positive Uses of the Green Belt

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

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

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

Option 2 – PPG2 is sufficiently clear and particular issues and opportunities will often be specific to location and as such matters to be addressed in Local Development Frameworks.

Safeguarding Mineral Resources

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

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

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

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

Please tick one box Yes No

If yes, please provide reasons for your answer.

No comment.

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

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

Please tick one box Yes No

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

Yes, although safeguarding priorities should be equal in both urban and rural areas. However, care should be taken not to undermine regeneration/renaissance in the MUA's, defined 'Local Regeneration Areas' and Market Towns. There are naturally different issues arising from urban and rural areas. Issues relating to urban areas may include noise and effects on local resident's amenity; congestion on local highway networks; impacts on townscape etc. These could usefully be recognised. In rural areas care should be taken to the erosion of landscape character together with possible adverse impacts on biodiversity and geodiversity.

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If no, please give reasons for your views.

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

could be as follows:

Non-Mineral Development in a MCA comprising more than:

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

2 hectares for any Use Class B1, B2, B8

1 hectare for any residential development

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

This is considered to be an issue for the Minerals Planning Authorities to comment and advise on.
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Safeguarding Mineral Resources continued

Question M5: What minerals related infrastructure should be safeguarded in the Region? These could be for example:

Sites / facilities for concrete batching
the manufacture of coated materials
other concrete products

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

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

There is a need to ensure that long term options are kept open for the sustainable distribution and handling of materials in the future.

Future alternative uses for minerals related infrastructure that is no longer required should also be considered.

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

This is dependent on location and specifics, but it is considered that this is an issue for the Minerals Planning Authorities to comment on.

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

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

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

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

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

Please tick one box Yes No

If yes, what matters should the policy address?

The priority should remain on sustainable resources and technologies. However, there is a growing concern over energy supply and ensuring options remain open should cleaner coal technology emerge. However, this will be a matter for the Minerals Planning Authorities and Minerals Local

Development Frameworks to consider.

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

Please tick one box Yes No

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

As above.

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

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Are there any other matters which an updated Policy M4 should address?
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Future Supplies of Construction Aggregates

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

Please tick one box Yes No

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

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

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

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

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

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

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

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

More emphasis on requirements to reuse and recycle on site materials.

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

- Future Patterns of Housing and Employment growth
- Existing Mineral Infrastructure
- Local Resource Availability
- Environmental Acceptability and Designations

- None of the above
- Other (please specify)

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

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

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

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

Please provide reasons for your answer.

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

Future Brick Clay Provision

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

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

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

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

Please tick one box

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

Please provide reasons for your answer.

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

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

Please tick one box

- Yes
- No

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

This will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

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

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

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

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

All those listed appear to be important considerations, but this will be a matter for the Minerals Planning Authorities and Minerals Local Development Frameworks to consider.

Please send your completed questionnaire by post to:

WMRSS Phase Three Revision
West Midlands Regional Assembly
Regional Partnership Centre
Albert House
Quay Place
92-93 Edward Street
Birmingham
B1 2RA

Or by fax: 0121 245 0201

Or by email: wmrss@wmra.gov.uk

(Electronic copies of the questionnaire can be downloaded from www.wmra.gov.uk)

Or complete online: www.wmra.gov.uk

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

All submissions must be received by 14th August 2009

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