

**West Midlands Regional Spatial Strategy  
Phase Three Revision  
Interim Policy Statements and  
Policy Recommendations  
March 2010**



**West Midlands  
Regional Assembly**

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## Context

Following the publication of Regional Planning Guidance for the West Midlands in June 2004 which subsequently became the Regional Spatial Strategy (WMRSS) for the West Midlands, the West Midlands Regional Assembly (WMRA), in its role as Regional Planning Body (RPB), was tasked by the Secretary of State to further develop selective elements of the WMRSS. This revision process has been undertaken in the following three phases:

➤ **Phase One** was completed in January 2008 and sets out a long-term strategy for the Black Country area.

➤ **Phase Two** focused on housing development, employment land, town centres, transport and waste together with overarching policies relating to climate change and sustainable development. This Phase was subject to an Examination in Public (EiP) in Spring 2009. The Panel Report was published in September 2009, but in March 2010 the Government advised WMRA that the Secretary of State's Proposed Changes would not be published before July 2010. Further details can be found on the Government Office for the West Midlands (GOWM) website at: <http://www.gos.gov.uk/gowm/Planning/515750/863204/>

➤ **Phase Three** looked at rural services, gypsies, travellers and travelling showpeople, culture, sport and tourism, environment and minerals. The Phase Three Revisions are the focus of this document.

## Interim Policy Statements and Policy Recommendations

The Local Democracy, Economic Development and Construction Act 2009 will, amongst other things, bring together Regional Spatial Strategies and Regional Economic Strategies into a single Regional Strategy for each of the English regions.

From 1st April 2010, the Regional Strategy in the West Midlands will consist of the West Midlands Regional Spatial Strategy (January 2008 version which incorporates WMRSS Phase One) and the existing Regional Economic Strategy (RES).

Any WMRSS Phase Three legacy work will be incorporated in developing the new Regional Strategy.

In the light of these legislative changes, WMRA, GOWM and Advantage West Midlands (AWM) agreed in September 2009 that the issues covered in the Phase Three Revision should be progressed through the new Regional Strategy process rather than through the WMRSS Phase Three Revision. It was agreed that the Phase Three issues be taken forward in one of two ways:

- 1) **Interim Policy Statements** which will provide a framework for relevant policies in the preparation of Local Development Frameworks. Two Policy Statements have been developed which cover the provision of pitches for gypsies, travellers and travelling showpeople and the sub-regional apportionment of construction aggregates;
- 2) **Policy Recommendations** which will feed into the preparation of the new Regional Strategy. The majority of issues within the Phase Three Options document will be progressed in this manner.





# Introduction

The Policy Recommendations were approved by the WMRA in February 2010. The Interim Policy Statements were approved by the WMRA in March 2010. The Interim Policy Statements and Policy Recommendations were also noted by the Joint Strategy and Investment Board (JS&IB) in March 2010 as a basis for future work by the two responsible regional authorities, the West Midlands Leaders Board and AWM.

This document draws together all of the Interim Policy Statements and Policy Recommendations.

## Use of the Interim Policy Statements and Policy Recommendations

**On 30th March 2010 GOWM confirmed that they now expect planning authorities to ensure that their Development Plan Documents are sufficiently flexible to enable them to deliver the requirements set out in the Interim Policy Statements.**

**GOWM also confirmed that the Policy Recommendations should be progressed as part of the new Regional Strategy.**

GOWM letters relating to the Interim Policy Statements and Policy Recommendations can be downloaded from the WMRA website at [http://www.wmra.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/WMRSS\\_Revision/WMRSS\\_Revision\\_Phase\\_3.aspx](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/WMRSS_Revision/WMRSS_Revision_Phase_3.aspx)

If you have any queries relating to the Interim Policy Statements or Policy Recommendations please contact the West Midlands Leaders Board - contact details on the back cover of this document.



Olwen Dutton  
Chief Executive  
West Midlands Regional Assembly

March 2010





# Development of the Interim Policy Statements and Policy Recommendations

The first stage of the WMRSS Phase Three Revision process was the publication of a **Project Plan** which set out the issues to be covered in the Revision. A Draft Project Plan was issued for consultation in November 2007. Following extensive dialogue with GOWM, the final Project Plan was published in May 2009.

Because there were choices as to the nature and content of new or revised policies, an **Options** document was issued for consultation from June to August 2009 to help identify those choices (and the consequences of adopting them).

Following the Options consultation a "Preferred Option" would normally have been developed which would then have been submitted to the Secretary of State. However, as explained in the Introduction, following legislative changes arising from the Local Economic Development and Construction Act 2009 (and advice from GOWM in April 2009) it was agreed by WMRA, GOWM and AWM in September 2009 that the issues should be taken forward into the new Regional Strategy through Interim Policy Statements and Policy Recommendations.

In order to test the Interim Policy Statements and Policy Recommendations at each stage of development, Sustainability Appraisals (SA), Habitats Regulations Assessments (HRA) and Rural Proofing were undertaken.

A **Sustainability Appraisal (SA)** is mandatory for Regional Spatial Strategies under Section 39(2) of the Planning and Compulsory Purchasing Act 2004. The aim of a SA is to promote a better quality of life through the achievement of sustainable development. The SA incorporates the requirements of the EU's **Strategic Environmental Assessment (SEA)** Directive. SEA is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes, and is required for Regional Spatial Strategies under the Directive as transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. The Sustainability Appraisals of the Interim Policy Statements and Policy Recommendations was undertaken by URSUS Consulting Limited.

Under EU Directive 92/43, the Regional Planning Body is required to undertake a **Habitats Regulations Assessment (HRA)**. The purpose of a HRA is to assess the impacts of policies against the conservation objectives of European habitat sites and to ascertain that policies do not adversely affect the integrity of any of these sites. The Habitats Regulations Assessments for the Interim Policy Statements and Policy Recommendations were undertaken by Treweek Consulting Limited.

**Rural Proofing** is the process by which strategies, plans and policies are evaluated for their impact on those who live and work in the countryside to ensure that rural needs are not overlooked. Rural Proofing also assesses the different impacts that a strategy or policy might have in rural areas compared to elsewhere. Rural Proofing of the Interim Policy Statements and Policy Recommendations was led by the Rural Accord's Rural Proofing Team.



# Development of the Interim Policy Statements and Policy Recommendations

The chart below outlines the key stages in the development of the Interim Policy Statements and Policy Recommendations.

In addition to public **consultations** at the Project Plan and Options stages, the development of the Interim Policy Statements have also been informed by the following technical consultations:

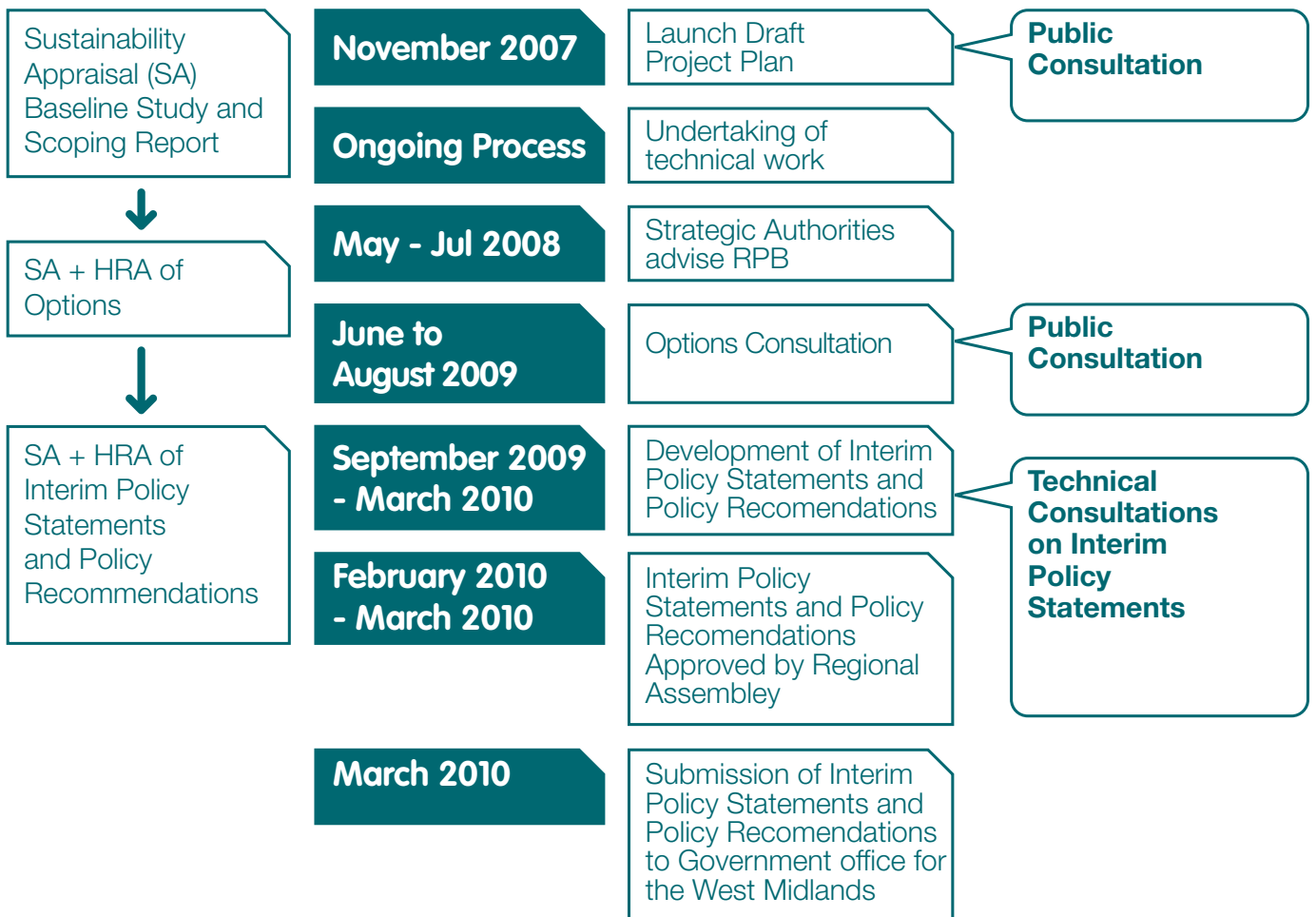
- Consultation with Local Planning Authorities and Gypsy and Traveller WMRSS Reference

Group on the Draft Interim Policy Statement for the Provision of New Accommodation for Gypsies, Travellers & Travelling Showpeople between October – November 2009, and also January – February 2010

- Consultation with West Midlands Regional Aggregates Working Party (WMRAWP) and Minerals Planning Authorities on the Draft Interim Policy Statement for Sub-Regional Apportionment of Aggregates between December 2009 – January 2010, and also in February 2010

To accompany the Interim Policy Statements and Policy Recommendations, **Background Reports** have also been produced for each of the topics considered.

Copies of all the supporting material for the Interim Policy Statements and Policy Recommendations can be found on the WMRA website at [http://www.wmra.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/WMRSS\\_Revision/WMRSS\\_Revision\\_Phase\\_3.aspx](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/WMRSS_Revision/WMRSS_Revision_Phase_3.aspx)



# WMRSS Phase Three Revision

## Interim Policy Statements



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## 1. Purpose of Interim Policy Statement

**1.1** The West Midlands Interim Policy Statement has been developed by the West Midlands Regional Planning Body to inform the Local Development Framework (LDF) process. The overall aim is to increase existing rates of delivery on new pitches and plots for Gypsies, Travellers and Travelling Showpeople in the West Midlands within national policy aimed at increasing such provision (see Appendix 1).

## 2. Scope

**2.1** The Interim Regional Policy Statement addresses the pitch requirements by District for:

- Residential pitches for Gypsies and Travellers – from 2007 -2017 dealing with undersupply
- Residential pitches for Gypsies and Travellers – from 2017 -2027 giving indicative requirements and
- Transit sites of various types for Gypsies and Travellers.

**2.2** The needs of Travelling Showpeople are addressed on a County-wide basis or by group of authorities due to the low level of numbers involved and the wider areas of search for this residential and commercial land use.

**2.3** The Interim Policy Statement also sets out some supporting policy to facilitate LDF production and further textual advice and guidance.

## 3. Summary of accommodation issues for gypsies and travellers and benefits to be realised through increased provision

**3.1** Gypsies and Travellers experience the worst health and education status of any disadvantaged group in England. Life expectancy is, for example, 12 years less for women and 10 years less for men than among the settled community. In 2007, 7% of children of Gypsy/Romany origin and 8.4% of Traveller children of Irish Heritage achieved 5 or more A\* to C grades in GCSE or equivalent exams including English and mathematics in England compared to a national average of 45.4%. Research has consistently shown a link between such measures of disadvantage and the shortage of good quality Gypsy and Traveller sites.

**3.2** Gypsies and Travellers without an authorised pitch for their caravans are homeless. Shortage of authorised sites underlies the unauthorised development of sites by Gypsies and Travellers without planning permission, and unauthorised encampments on roadsides, car parks or other pieces of land. Such unauthorised sites provide uncertain and often very poor living conditions for Gypsies and Travellers, disruption and anxiety for settled neighbours, and costs to local authorities in management and enforcement. They exacerbate community tensions and make community cohesion and social inclusion harder to achieve.

**3.3** There are sound housing, humanitarian, social and welfare reasons for increasing the supply of good quality Gypsy and Traveller sites. The benefits will be felt by Gypsies and Travellers, by members of the settled community and by local authorities. The need for enforcement action in relation to unauthorised sites will be less, and will be more straightforward, if unauthorised sites continue once adequate provision has been made.

## 4. Summary of accommodation issues for travelling showpeople

**4.1** Travelling Showpeople are an occupational group who make their living running funfairs and circuses. Traditionally they have travelled between engagements except in winter months when they occupied 'winter quarters' where they lived, and stored, maintained and tested equipment. Changing patterns of trade and lifestyle mean that some Showpeople now travel to more local engagements from a fixed base throughout the year or need to return to base on occasion through the year. Some family members are retired and again occupy a base through the year.

**4.2** Sites for Travelling Showpeople are sometimes referred to as 'yards' which may be subdivided into 'plots' each occupied by a single family with one or more trailers. A 'plot' is the unit of land occupied by a single nuclear family, and is broadly equivalent to a 'pitch' for Gypsies and Travellers. Plots and yards for Travelling Showpeople normally accommodate both living vehicles and trade equipment





# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

which has to be maintained, tested and stored while not in use. The needs of Travelling Showpeople are different from those of Gypsies and Travellers but again a shortage of appropriate sites is leading to accommodation problems for families and sometimes to problems in carrying out business activities sufficient to threaten livelihoods.

## 5. Current levels of provision in the West Midlands

**5.1** In 2007, there were 1,094 authorised pitches for Gypsies and Travellers across the region, mostly for residential rather than transit use. There were 209 plots for Travelling Showpeople. Table 1 shows current provision at local authority level and demonstrates the current uneven spread of provision for both Gypsy and Traveller pitches and Travelling Showpeople plots.

**5.2** National issues of shortage of site accommodation for Gypsies, Travellers and Travelling Showpeople are applicable in the West Midlands. The sub-regional Gypsy and Traveller Accommodation Assessments (GTAA's - with a few slight corrections where further evidence has been provided subsequently) estimated requirements between 2007 and 2017 for 938 additional residential and 219 additional transit pitches for Gypsies and Travellers. They estimated requirements for an additional 118 plots for Travelling Showpeople between 2007 and 2012. These figures are further explained in the accompanying text to the Interim Policy Statement. There is a need for a significant and urgent increase in the provision of sites for Gypsies and Travellers, and for Travelling Showpeople.

**Table 1 : Current Provision of Gypsy and Traveller Pitches and Travelling Showpeople Plots**

Local authority	Gypsy and Traveller Pitches	Travelling Showpeople Plots
<b>Staffordshire &amp; Stoke</b>	<b>282</b>	<b>13</b>
Cannock Chase	41	3
East Staffordshire	17	-
Lichfield	2	-
Newcastle-under-Lyme	17	2
South Staffordshire	83	5
Stafford	71	-
Staffordshire Moorlands	1	2
Stoke-on-Trent	50	1
Tamworth	-	-
<b>Warwickshire</b>	<b>159</b>	<b>12</b>
North Warwickshire	21	-
Nuneaton & Bedworth	36	2
Rugby	66	-
Stratford-on-Avon	36	5
Warwick	-	5
<b>Worcestershire</b>	<b>240</b>	<b>56</b>
Bromsgrove	18	8
Malvern Hills	20	17
Redditch	-	31
Worcester	20	-
Wychavon	123	-
Wyre Forest	59	-
<b>Birmingham, Black Country, Coventry &amp; Solihull</b>	<b>169</b>	<b>108</b>
Birmingham	10	25 (1 yard)
Coventry	20	-
Dudley	27	10
Sandwell	15	13
Solihull	37	-
Walsall	20	55
Wolverhampton	40	5
<b>Herefordshire, Shropshire, Telford &amp; Wrekin</b>	<b>244</b>	<b>20</b>
Herefordshire	81	-
Shropshire	124	12
Telford & Wrekin	39	8
<b>REGIONAL TOTAL</b>	<b>1,094</b>	<b>209</b>



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

**5.3** Against this background, the aims of the Interim Policy Statement are:

- (i) To increase significantly the number of Gypsy and Traveller pitches across the West Midlands, in order to address existing under-provision as expressed in the sub-regional Gypsy and Traveller Accommodation Assessments (GTAAs).
- (ii) To ensure there are sufficient plots in the Region to meet the accommodation needs of Travelling Showpeople.
- (iii) To ensure that all revised Gypsy, Traveller and Travelling Showpeople policies in the West Midlands Regional Spatial Strategy (WMRSS), Local Development Frameworks (LDFs) and other regional and sub-regional strategies recognise, protect and ensure a traditional travelling way of life for Gypsies, Travellers and Travelling Showpeople, whilst also respecting the interests of settled communities.
- (iv) To ensure that all Development Plan Documents (DPDs) include fair, realistic and inclusive policies in relation to the accommodation needs of Gypsies, Travellers and Travelling Showpeople and that the potential for Gypsies, Travellers and Travelling Showpeople to be evicted and thereby become homeless is avoided.
- (v) To ensure issues of sustainability, both socially and economically for Gypsy and Traveller communities and for the protection of significant

environmental landscape and habitat assets, are properly applied.

## 6. Development of an Interim Policy Statement

**6.1** The regional Interim Policy Statement has developed from Phase 3 of the Regional Spatial Strategy Revision. The provision of sites for Gypsies, Travellers and Travelling Showpeople was one of five planning policy areas which formed the WMRSS Revision Phase 3 which commenced in January 2008.

**6.2** The West Midlands Regional Assembly (WMRA) and Government Office for the West Midlands (GOWM) decided that a 'Preferred Option' developed within the former statutory framework for Regional Planning for the provision of sites for Gypsies, Travellers and Travelling Showpeople would not be appropriate. However, to ensure the avoidance of a policy vacuum, WMRA and GOWM agreed to formulate a Regional Policy Statement, which will serve as planning guidance, until the 'Strategy for the West Midlands' is confirmed.

**6.3** **Until the Strategy for the West Midlands has been completed, the status of this Regional Interim Policy Statement for Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople has been confirmed by GOWM as having 'similar weight to a submitted draft WMRSS'. Discussions with the Planning Inspectorate indicate that the Statement will 'carry weight in both Development Plan Document (DPD) examinations and Planning Inquiries'.**

**6.4** The regional Interim Planning Statement was led by WMRA and involved close liaison with local authority colleagues and a wide range of stakeholders, including direct contact with the various Travelling communities across the Region and the (Travelling) 'Showmen's Guild of Great Britain'. The key stages and activities can be summarised:

1. Assembling an evidence base.
2. Development of 'Options' for new regional planning policy.
3. Consultation on 'Options' for new regional planning policy.
4. Assessment of responses submitted to the WMRSS Phase 3 Revision consultation.
5. Development of a regional Interim Policy Statement, including further consultation with local authorities and other stakeholders.
6. Endorsement and adoption of the regional Interim Policy Statement.

**6.5** Appendix 2 gives further details of the activities involved in each stage. A Background Paper is also available on the Assembly web site, which provides further explanation of how the 'Options' were developed:

<http://www.wmra.gov.uk/documents/Gypsies%20Travellers%20Trav%20Showpeople%20Background%20>



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## 7. Key messages from the WMRSS Phase Three Revision consultation period

**7.1** In developing the Interim Policy Statement, WMRA had particular regard to the responses submitted to the public consultation on Options, along with other comments, contributed from a range of sources, throughout the lifetime of the Phase 3 process.

**7.2** Key messages from the Options consultation process in regards to additional **Residential pitches** for Gypsies and Travellers were as follows:

➤ Opinions differed on whether the total residential pitch requirements (939 at the time of the Options Consultation - summer 2009) for Gypsies and Travellers were appropriate. 26% agreed with the figure, 31% thought it was too low, 30% that it was too high, and 13% made some other comment. Gypsy and Traveller individuals were most likely to think the figures too low on the basis of their own and their children's experiences. District and Parish Councils from across the Region, but particularly from Staffordshire, were most likely to think the figures too high arguing that they may be based on aspirations rather than need for site accommodation.

➤ In the context of such very diverse responses, WMRA decided to retain the 939 additional residential pitches as the planning total for the Region since it was based on the local authorities' Gypsy and Traveller Accommodation Assessments. Following the November 2009 consultation (with local authorities and the Gypsy

and Traveller WMRSS Reference Group) this figure was subsequently slightly adjusted in the light of further evidence provided by local authorities to 938 additional pitches.

➤ There were fundamental and irreconcilable differences in preferences between different categories of consultee over whether a redistributive Option is preferred. Three-quarters of Gypsy and Traveller individual consultees preferred the non-redistributive Option 1 (so that family links could be retained) while the majority of other consultees preferred one of the redistributive Options to widen areas of provision and share 'the burden'.

➤ 7 out of 10 local authorities preferred a redistributive Option, but this was split between Option 2 (partly influenced by planning opportunities and constraints), Option 3 (redistribution to provide a minimum of 14 additional pitches in every local authority area), and a view that none of the Options was sufficiently redistributive.

➤ There was no consensus between local authorities across the Region or within sub-regions on the preferred Option.

➤ The Options preferred by local authorities were incompatible with achieving the regional total of 939 (now 938) additional residential pitches to be provided. Most local authority consultees preferred the Option which gave their authority the lowest additional requirement. Combining preferred Options would have had the effect of lowering the regional total by up to 20% which was unacceptable as it would not meet evidenced need.

➤ In the context of such polarisation in the consultation opinions and lack of consensus on which Option was preferred, WMRA decided to develop a further Option which combined elements of each of the Options consulted upon, maintaining the commitment to delivering the full 939 (now 938) pitches by 2017, and being as sensitive as possible to the effects and sustainability issues attendant upon developing a further distributive Option.

**7.3** Key messages from the Options Consultation process in regards to additional **transit pitches** for Gypsies and Travellers were as follows:

➤ Opinions differed on whether the total transit pitch requirements (244) would meet the accommodation needs of Gypsies and Travellers. 39% thought the figure was about right, 28% thought it was too low, 17% that it was too high, and 17% made some other comment. Gypsy and Traveller individuals were most likely to think the figures too low. Many of those who thought residential pitch requirements too high also thought transit requirements were too high. Shropshire, Herefordshire and Birmingham authorities later adduced evidence that figures for transit pitch requirements had been interpreted too high because of misunderstandings of the GTAA findings. **Amendments to redress these gave an adjusted total transit pitch requirement of 219 pitches.**

➤ A single geographical distribution of transit provision was consulted on, based on the findings of the sub-regional Gypsy and Traveller Accommodation Assessments. 35% of consultees thought that this distribution would meet the



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

accommodation needs of Gypsies and Travellers; 52% thought that it would not and 14% were not sure. Reasons for thinking the distribution would not meet needs included the need for a more even spread across the region, fear of over-provision in some areas and need for greater provision in metropolitan and urban areas.

**➤ In view of the range and balance of opinion, the regional Interim Policy Statement retains the geographical distribution of transit pitches as that which was consulted upon. This distribution was based upon the Gypsy and Traveller Accommodation Assessments undertaken by local authorities and represents the best and most robust evidence available.**

**7.4** Key messages from the Options Consultation process in regards to additional plots for **Travelling Showpeople** were as follows:

➤ There was more agreement amongst those responding to the consultation that the number of plots allocated for Travelling Showpeople (118) during the five year period 2007-2012 will meet these accommodation needs. 65% of consultees agreed that it would, 18% said that it would not and 17% were unsure but made a comment. Many of those not agreeing with the figures questioned the validity of the Gypsy and Traveller Accommodation Assessments as a basis for predicting need, but failed to provide alternative evidence.

➤ The majority of consultees (54%) favoured Option 1 as being in line

with the wishes of the Travelling Showpeople community and metropolitan authorities. 21% favoured Option 2 as widening potential choice, and 25% did not indicate a preferred Option but made a comment.

➤ The Options for Travelling Showpeople were expressed on a County basis rather than at District level. 60% of consultees agreed with this approach; 19% disagreed and 21% expressed no preference.

**➤ WMRA consider that the consultation response justifies the regional figure of 118 additional plots for Travelling Showpeople, and that these should be distributed on a County basis according to Option 1 – need where it arises as evidenced by the Gypsy and Traveller Accommodation Assessments.**

## 8. Further consultation

**8.1** Further consultation was undertaken in November 2009 with local authorities, other stakeholders and the Gypsy and Traveller Reference Group on a draft of the Interim Policy Statement. A note summarising representations and the WMRA response is available at: [http://www.wmra.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/WMRSS\\_Revision/WMRSS\\_Revision\\_Phase\\_3.aspx](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/WMRSS_Revision/WMRSS_Revision_Phase_3.aspx).

**8.2** All representations were carefully considered and taken into account where possible. In particular, evidenced amendments to GTAA's findings on current pitch provision figures and requirements were incorporated. Efforts were made to

relieve pressure on some authorities and make equitable redistributions of pitch requirements in the most pressured Warwickshire sub-region.

## 9. Interim Regional Policy

### Policy 1 - Residential Pitches for Gypsies and Travellers 2007 – 2017

**9.1** In view of the work undertaken by the West Midlands Regional Planning Body, as part of WMRSS Phase 3 Revision process, the Options Consultation and further consultation on a Draft Interim Regional Policy Statement, the Interim Regional Policy recommends the delivery of the following level of new accommodation:

#### Policy 1: Pitch Requirements for Gypsies and Travellers, 2007 – 2017

**660** additional Residential pitches required between 2007-2012

**278** additional Residential pitches required between 2012-2017

**224** additional Transit pitches between 2007-2017



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

9.2 At a District level the proposed allocation of additional residential pitches for Gypsies and Travellers is:

## Policy 1: Local Authority Allocation of Additional Residential Pitches for Gypsies and Travellers 2007 – 2017

Local Authority	Allocation 2007-2017
<b>Staffordshire &amp; Stoke:</b>	
Cannock Chase	35 pitches
East Staffordshire	15 pitches
Lichfield	14 pitches
Newcastle-under-Lyme	20 pitches
South Staffordshire	42 pitches
Stafford	37 pitches
Staffordshire Moorlands	2 pitches
Stoke-on-Trent	40 pitches
Tamworth	10 pitches
<b>Warwickshire:</b>	
North Warwickshire	16 pitches
Nuneaton & Bedworth	29 pitches
Rugby	42 pitches
Stratford-on-Avon	42 pitches
Warwick	23 pitches
<b>Worcestershire:</b>	
Bromsgrove	14 pitches
Malvern Hills	33 pitches
Redditch	14 pitches
Worcester	22 pitches
Wychavon	42 pitches
Wyre Forest	42 pitches
<b>Birmingham, Black Country, Coventry &amp; Solihull</b>	
Birmingham	19 pitches
Coventry	15 pitches
Dudley	23 pitches
Sandwell	5 pitches
Solihull	28 pitches
Walsall	39 pitches
Wolverhampton	36 pitches
<b>Herefordshire, Shropshire, Telford &amp; Wrekin</b>	
Herefordshire	109 pitches
Shropshire	93 pitches
Telford & Wrekin	37 pitches
<b>REGIONAL TOTAL</b>	<b>938 pitches</b>

9.3 Appendix 3 sets out for each local authority its pitch requirement on the basis of need where it arises (Consultation Option 1) and its proposed requirement for provision in this Interim Policy Statement. The final column explains derivation of the proposed figure.

## Justification

9.4 The principles underlying the proposed allocations are:

- The regional total of 938 additional pitches 2007-2017, based on the GTAAs amended in the light of subsequent evidence from local authorities, is to be achieved.

- There is a need to take a strategic view across local authorities in accordance with Circular 1/2006, and not simply to develop strategy just on the views of the individual authorities themselves taken in isolation.

- 'Need where it arises' (Option 1 in the public consultation) as estimated by the region's GTAAs was the starting point. This is in accord with Gypsy and Traveller community wishes and those of some authorities, as expressed in the consultation.

- A limited redistribution of pitches was undertaken to reduce the number of additional pitches to be provided in some Districts where Option 1 requirements were particularly high. The primary objective was where possible, to increase deliverability by reducing the task for Districts which had already made significant provision. An ideal maximum additional requirement was set at 42 pitches, three times the figure 14 which was used as a minimum pitch requirement (for a local authority area though



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not necessarily all on one site) in consultation Option 3 as a minimum sustainable Gypsy and Traveller community to recognise family links and avoid isolation. Appendix 4 provides further information on the derivation of the 14 pitch minimum and 42 pitch maximum premises.

➤ In order to maintain the regional total of 938 pitches, redistribution obviously requires additional pitches to be provided in some other Districts. Thus a decrease in any local authority area's allocation had to be balanced by an increase in provision in other local authorities nearby. This was done on a case by case basis, aiming to 'divert' pitches over as short a distance as possible while at the same time increasing choice for Gypsies and Travellers by raising provision in some Districts with low requirements under consultation Option 1 (need where identified in the GTAA)

**9.5** Given West Midlands geography and the current pattern of provision for Gypsies and Travellers, these principles played out differently in different sub-regions, and the distribution of pitches in the Interim Policy Statement reflects necessary pragmatic decisions to balance often conflicting factors. Local authorities with a need where it arises requirement of over 42 pitches form four sub-regions:

➤ Shropshire and Herefordshire: both unitary authorities have relatively high current provision and need where it arises requirements. There was no redistribution because of the large spatial size of these authorities and the extent of unconstrained land available.

➤ South Staffordshire: South Staffordshire has 8 pitches in excess of the 42 threshold. These have been shared between Lichfield, Sandwell and Telford & Wrekin as the geographically closest areas with either low need where it arises requirements or high capacity evidenced by the extent of unconstrained land. Individually, the increased allocations were small and never exceeded 3 pitches. Pitch allocations in Cannock Chase, Stafford, Wolverhampton and Walsall were not increased despite their proximity to South Staffordshire because of their relatively high current provision and need where it arises requirements. In addition, the Habitats Regulations Assessment of the draft Policy Statement highlighted the sensitivity of Cannock Chase as a significant European site.

➤ Wychavon and Wyre Forest: together these authorities had requirements 26 pitches in excess of the 42 pitch maximum. Requirements were diverted from Wychavon to adjoining Bromsgrove and Redditch, both of which have very low current provision and need where it arises requirements. In both instances the allocation achieves the 14 pitch threshold set for a sustainable community. Two pitches were diverted from Wyre Forest to Dudley primarily on the grounds of geographical proximity, easing the sub regional pressure with only marginal impact on adjoining authority areas.

➤ Rugby and Stratford on Avon: together these authorities had requirements 34 in excess of the 42 pitch threshold. Pitches were diverted to Redditch, Solihull, Warwick,

Coventry, North Warwickshire and Tamworth. Diversions were primarily determined by proximity and/or accessibility along the A5 route which formed the underlying rationale for the Local Authorities' GTAA in this area. Diversions in excess of 3 pitches to Warwick, Coventry and North Warwickshire were made on the grounds of current provision and 'needs where they arise' requirements which are low relative to other authorities in this sub-region. The allocation to Nuneaton & Bedworth was not increased because it has the highest current provision and requirements among potential 'importers' of pitches.

## Policy 2 - Residential Pitches for Gypsies and Travellers beyond 2017

### Policy 2: Pitch Requirements beyond 2017

**A co-ordinated review of sub-regional GTAAs should be undertaken no later than 2015 or sooner if refreshed evidence is agreed by the Responsible Regional Authorities to be required from the local authorities to inform the Strategy for the West Midlands (Regional Strategy). In the meantime Local Planning Authorities are expected to use the indicative figures in Table 1 below to provide a basis for planning for pitch provision beyond 2017 if fresh GTAA evidence has yet to be established.**



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

**Table 2 : Indicative Requirements for Residential Pitches for Gypsies and Travellers Beyond 2017.**

Local Authority	Indicative requirements	
	2017-2022	2022-2027
<b>Staffordshire &amp; Stoke</b>	<b>77 pitches</b>	<b>89 pitches</b>
Cannock Chase	13 pitches	15 pitches
East Staffordshire	5 pitches	6 pitches
Lichfield	5 pitches	6 pitches
Newcastle-under-Lyme	7 pitches	8 pitches
South Staffordshire	15 pitches	17 pitches
Stafford	13 pitches	15 pitches
Staffordshire Moorlands	1 pitches	1 pitches
Stoke-on-Trent	14 pitches	17 pitches
Tamworth	4 pitches	4 pitches
<b>Warwickshire</b>	<b>54 pitches</b>	<b>63 pitches</b>
North Warwickshire	6 pitches	7 pitches
Nuneaton & Bedworth	10 pitches	12 pitches
Rugby	15 pitches	17 pitches
Stratford-on-Avon	15 pitches	17 pitches
Warwick	8 pitches	10 pitches
<b>Worcestershire</b>	<b>60 pitches</b>	<b>69 pitches</b>
Bromsgrove	5 pitches	6 pitches
Malvern Hills	12 pitches	14 pitches
Redditch	5 pitches	6 pitches
Worcester	8 pitches	9 pitches
Wychavon	15 pitches	17 pitches
Wyre Forest	15 pitches	17 pitches
<b>Birmingham, Black Country, Coventry &amp; Solihull</b>	<b>59 pitches</b>	<b>68 pitches</b>
Birmingham	7 pitches	8 pitches
Coventry	5 pitches	6 pitches
Dudley	8 pitches	9 pitches
Sandwell	2 pitches	2 pitches
Solihull	10 pitches	12 pitches
Walsall	14 pitches	16 pitches
Wolverhampton	13 pitches	15 pitches
<b>Herefordshire, Shropshire, Telford &amp; Wrekin</b>	<b>85 pitches</b>	<b>99 pitches</b>
Herefordshire	39 pitches	45 pitches
Shropshire	33 pitches	39 pitches
Telford & Wrekin	13 pitches	15 pitches
<b>REGIONAL TOTAL</b>	<b>335 pitches</b>	<b>388 pitches</b>

**9.6** In the absence of new GTAA evidence and subject to further higher level strategic policy which may subsequently be approved or come into force, local planning authorities are expected to use the indicative figures in Table 2 post 2017, so that provision will be made across the region. This is based upon an anticipated household growth which is an annual 3% compound increase in the level of residential pitch provision for Gypsies and Travellers, assuming the back log of provision has been made by 2017.

**9.7** Indicative additional pitch allocations 2017-2022 and 2022-2027 at District Level, assuming that each District will take a similar proportion of the regional total as in 2007-2017, are outlined in Table 2.

## Policy 3 - Transit Pitch Provision for Gypsies and Travellers

**9.8** For the purposes of this regional Interim Policy Statement, transit pitches are identified as any type of accommodation which meets the needs of Gypsies and Travellers on a temporary basis, for example a formal transit site, an informal stopping-place or designated location to address seasonal demands or instances of emergency. A wide range of transit provision is required in the West Midlands, to facilitate movement both around and through the Region reflecting the culture and lifestyle of Gypsies and Travellers.



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

**9.9** The proposed District allocation for additional transit pitches for Gypsies and Travellers is:

## Policy 3: Local Authority Allocation of Additional Transit Pitches for Gypsies and Travellers 2007 – 2017.

Local Authority	Allocation 2007 - 2017
<b>Staffordshire &amp; Stoke</b>	<b>44 pitches</b>
Cannock Chase	5 pitches
East Staffordshire	5 pitches
Lichfield	5 pitches
Newcastle-under-Lyme	5 pitches
South Staffordshire	5 pitches
Stafford	2 pitches
Staffordshire Moorlands	2 pitches
Stoke-on-Trent	10 pitches
Tamworth	5 pitches
<b>Warwickshire</b>	<b>40 pitches</b>
North Warwickshire	5 pitches
Nuneaton & Bedworth	5 pitches
Rugby	5 pitches
Stratford-on-Avon	10 pitches
Warwick	15 pitches
<b>Worcestershire</b>	<b>68 pitches</b>
Bromsgrove	0 pitches
Malvern Hills	10 pitches
Redditch	18 pitches
Worcester	20 pitches
Wychavon	20 pitches
Wyre Forest	0 pitches
<b>Birmingham, Coventry &amp; Solihull</b>	<b>20 pitches</b>
Birmingham	10 pitches
Coventry	5 pitches
Solihull	5 pitches
<b>Black Country</b>	<b>12 pitches</b>
Dudley	3 pitches
Sandwell	3 pitches
Walsall	3 pitches
Wolverhampton	3 pitches
<b>Herefordshire, Shropshire, Telford &amp; Wrekin</b>	<b>40 pitches</b>
Herefordshire	5 pitches
Shropshire	20 pitches
Telford & Wrekin	10 pitches
<b>REGIONAL TOTAL:</b>	<b>219 pitches</b>

## Justification

**9.10** Following the public consultation, the proposed provision in this regional Interim Policy Statement for additional transit pitches for Gypsies and Travellers, 2007-2017 was directly based on the findings of the sub-regional GTAA's, amended for evidence provided by local authorities through consultation. These determined both the regional pitch total, the allocation between County groups and the indicative allocations to Districts.

## Further Advice and Guidance

**9.11** To facilitate movement around and through the West Midlands, all authorities are encouraged to contribute to the creation of a 'Transitory Network'. Since unauthorised encampments can occur anywhere and the resulting tensions can best be resolved through a collaborative response, this includes those authorities where the GTAA has identified nil need.

**9.12** Each District will be expected to identify locations to deliver the number of additional Transit pitches identified. However, whilst indicative pitch numbers are allocated on a District basis, it is hoped that joint working between local authorities will enable the identification of suitable sites over a wider geographical area and thereby contribute to speedier delivery.



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Policy 4 - Identification of Residential and Transit Sites for Gypsies and Travellers and the LDF Process

### Policy 4 : Identification of Sites / LDF Process:

- a) **Local Development Frameworks** – each Local Planning Authority (LPA) should identify the location of specific sites within their Development Plan Documents (DPD's), to ensure the requirements set out in the regional Interim Policy Statement (see ODPM Circular 01/2006) are met. These locations must be attractive to Gypsies and Travellers and take into account factors such as: impacts on significant environmental assets, access to the highways network and key services, any local evidence in relation to unauthorised encampments and historical patterns of travel and annual events. Where joint LDFs are prepared, the distribution of pitch numbers between authorities can be adjusted, where appropriate.
- b) **Criteria-based Policies** – criteria-based policies can accompany site allocations in DPDs but these should be supplementary only, with primary significance given to meeting the pitch numbers in the above Policies. A criteria based supplementary policy must be fair, reasonable, realistic and should not place undue constraints on the development of Gypsy and Traveller sites.
- c) **Identification of a Range of Sites** – each LPA is encouraged to identify a range of sites within their DPDs, which will meet the variety of accommodation needs, required by Gypsies and Travellers. Specifically:
- i. the allocation of small sites is particularly recommended to facilitate the delivery of private family sites, together with larger allocations to deliver publicly owned and run sites.
  - ii. the allocation of land to meet the specific accommodation needs of New Travellers should also be made within DPDs where locationally required.
  - iii. both stopping places and more formal transit sites, which offer a range of basic services will be required. Where formal transit sites are required (as identified in the GTAAs) LPAs are encouraged to prioritise the delivery of these in order to directly address travelling patterns or repeated incidence of roadside encampments.
- d) **Consultation with Travelling communities** -LPAs are expected to consult with the Travelling communities within their respective areas, as part of their LDF process, to determine the most appropriate type of sites which will best meet their needs.
- e) **Rate of Delivery** – LPAs should endeavour to actively promote policies and practices which encourage applications for new accommodation and prioritise addressing the existing backlog of need. LPAs may choose to take individual action or work in partnership with local Registered Providers (RPs) or Private providers but it is important that positive progress is made at regular stages and will be subject to a regular monitoring regime.



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Policy 5 - Plots for Travelling Showpeople

9.13 At a County level the proposed allocation of additional Plots for Travelling Showpeople is:

### Policy 5: Allocation of Additional Plots by County and Local Authority Grouping for Travelling Showpeople 2007 - 2012

County	Allocation 2007 – 12
Shropshire, Herefordshire and Telford & Wrekin	9 Plots
Staffordshire and Stoke-on-Trent	23 Plots
Warwickshire	1 Plot
Worcestershire	22 Plots
Birmingham, Black Country, Coventry & Solihull*	63 Plots
<b>REGIONAL TOTAL:</b>	<b>118 Plots</b>
* As at Jan 2010, 30 of these plots were required for the relocation and expansion of an existing funfair operator in Birmingham. As the operator's area of search extends south beyond the conurbation, provision could be made elsewhere e.g. within Warwickshire, if a suitable site were to be required and identified. Please note Policy 6 (b) below.	

## Justification

9.14 The regional Interim Policy Statement considered additional plot requirements at County level rather than at District level because of the problems of allocating relatively small plot numbers between Districts for a group who often have a wide area of search and must satisfy commercial as well as residential criteria when developing sites.

➤ The time period is 2007-2012 because of difficulties in predicting requirements over a longer period in a changing occupational market.

➤ Following the Options consultation, the WMRA proposed provision in the regional Interim Policy Statement for additional plots for Travelling Showpeople, 2007-2012, directly based on the findings of the

sub-regional GTAA's. These determined both the regional pitch total and the allocation between Counties and groups of authorities.

➤ In its response to the WMRSS Phase 3 Options consultation, the West Midlands Branch of the Showmen's Guild supported Option 1, to distribute additional plots upon the basis of 'Need Where It Arises' and subsequently expressed its agreement with the draft Interim Policy Statement.

well as more traditional concerns of housing needs. Consequently, when allocating land for new plots/yards, both accommodation needs and commercial requirements should be taken into account. In circumstances where a part yard or whole yard (a collection of plots) relocation is required, LPAs should acknowledge that this may result in significant geographical movement across the Region.

## Identification of Sites in Relation to Commercial Requirements

9.15 The accommodation needs of Travelling Showpeople are influenced by economic considerations as

# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Policy 6 - Identification of Residential and Transit Sites for Gypsies and Travellers and the LDF Process

### Policy 6 : Supporting Travelling Showpeople Policy

a) **Identification of Sites** – LPAs should allocate sufficient sites within their Local Development Frameworks, to address the level of need identified within the Interim Regional Statement after discussion with this business sector's representatives and neighbouring authorities to ensure relevant, sensitive and appropriate allocations of plots.

b) **Relocation** - By working collaboratively, LPAs should address any individual cases for re-location as they arise, which will not only meet the needs of the Travelling Showpeople communities concerned but also bring economic benefits for the individual local authorities affected and the wider regional economy overall. Relocation requirements should be justified, and clear mechanisms and criteria, including planning constraints, for identifying any necessary alternative site(s) need to be set out.

c) **Relocation** - Where such a relocation is required between local authority areas, the resultant change overrides the plot numbers given in Policy 5. Annual Monitoring will track any such adjustments.

d) To ensure all allocations are appropriate, in terms of size (to meet both residential and commercial needs), design and location (to facilitate ease of movement by large vehicles from the yard to the Highways network), it is recommended that the guidelines produced by Showmen's Guild of Great Britain are referred to in assessing site capacity and scheme design.

**Active Dialogue with the West Midlands Branch of the Showmen's Guild** – to enable the delivery of new Travelling Showpeople plots / yards it is essential that LPAs develop an effective channel of communication with the Travelling Showpeople communities within their areas and those of neighbouring areas. The Showmen's Guild holds specific knowledge as to the accommodation requirements of Showpeople, which should be beneficial in enabling delivery and meeting need.

## Plot Requirement for Travelling Showpeople beyond 2012

**9.16** An annual growth rate of 1.5% compound should be assumed beyond 2012 based on plot requirements at the start of the period. At regional level this produces an indicative estimate of between 25 and 30 additional residential plots each five year period beyond 2012.

## Policy 7 - Supplementary Policy to Facilitate Delivery of the Interim Regional Policy Statement

### Policy 7 : Supplementary Policy for Gypsy, Travellers and Travelling Showpeople Accommodation

Consultation and Active Dialogue with Travelling communities – to enable the identification of suitable sites, LPAs or groups of authorities are encouraged to open an active dialogue with the Travelling communities within their areas, to obtain a better understanding of their patterns of residence, travel and lifestyle. Local authority support for the establishment of local / sub-regional forums or networks would be helpful in terms of improving the capacity of individual Gypsy and Travellers and organisations to contribute to the debate around new accommodation and foster a more inclusive approach to Gypsy, Traveller and Travelling Showpeople issues overall.



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Design and Size of Sites

**9.17** It is essential that Development Control understands the specific needs and issues involved in new site/yard delivery. When considering site design, Development Control policy and processes should refer to the guidance produced by both Communities Local Government (CLG) and the Homes and Communities Agency (HCA), along with any examples of Best Practice from within the West Midlands and from other Regions, and, importantly, any advice obtained through consultation with local Travelling communities.

**9.18** Those preparing the design and layout of sites and preparing planning applications for Gypsy and Traveller accommodation should consult the Police and Fire Services for their advice, expertise and experience in ensuring the consistent delivery of high design standards across the West Midlands.

**9.19** LPAs should acknowledge the diversity and complexity of the range of communities that are encapsulated within overall Gypsy and Traveller communities, which necessitates a variety of site layouts. For example, some sites for New Travellers may be quite informal in design and may not feature all standard facilities, whereas some sites for other Gypsies and Travellers may require additional land in order to accommodate animals and/or commercial activities.

**9.20** A figure of 14 pitches – not all necessarily in the same place – has been identified in the Interim Policy Statement as an approximation to an ideal minimum provision at the District level to facilitate the creation of sustainable communities and guard against potential isolation. However, it is recognised that individual sites may be much smaller or larger, as determined by local requirements, and that an allocation of 14 pitches does not have to be met in one location.

## Enabling of both Private and Public Sites

**9.21** LPAs are encouraged to actively enable the delivery of both public and private provision for Gypsies and Travellers. Whilst it is anticipated that half or more of the additional pitch requirements will be met by Gypsies and Travellers themselves, it is essential that public provision is facilitated to meet the needs of the more vulnerable sections of the Travelling communities, including the elderly, young people and those with health issues.

**9.22** It is likely that most new provision for Travelling Showpeople will be privately funded, but in view of the prevailing economic circumstances this assumption should be kept under regular review. Any emerging evidence of an increasing inability to make self-provision should be investigated to see whether public support can be made available.

## Maintenance of Sites

**9.23** As additional accommodation will only be delivered as result of the input of a considerable range of resources, it is essential that good quality accommodation is retained. Effective management and maintenance arrangements should be put in place as a condition of new and refurbished pitch provision to ensure that sites do not fall into disrepair, leading to abandonment and loss of provision.

## Role of the Homes and Communities Agency

**9.24** The Homes and Communities Agency (HCA) administers the Gypsy and Traveller Site Grant Programme which provides public funding for the delivery of new and refurbished accommodation by local authorities, RSLs and Registered Providers. The HCA will use the ‘Single Conversation’ process to discuss the delivery of new accommodation for Gypsies, Travellers and Travelling Showpeople with each local authority and thereby ensure that this element of housing need is not left unaddressed.







# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

**9.25** Consequently, local authorities are encouraged to consider developing bids to the Grant programme and to seek advice from the HCA, the Assembly (or its successor body) and GOWM, where appropriate. Examples of innovation in delivery are particularly encouraged, with creative partnership arrangements between local authorities, RSLs and Registered Providers, and Gypsy and Traveller communities. Proposals for shared-ownership or self-build schemes may be suggested.

**9.26** Local authorities are also asked to encourage the provision of sites through private funds, such as private developer contributions and Gypsy and Traveller pitch provision within new large-scale residential developments.

## The Green Belt

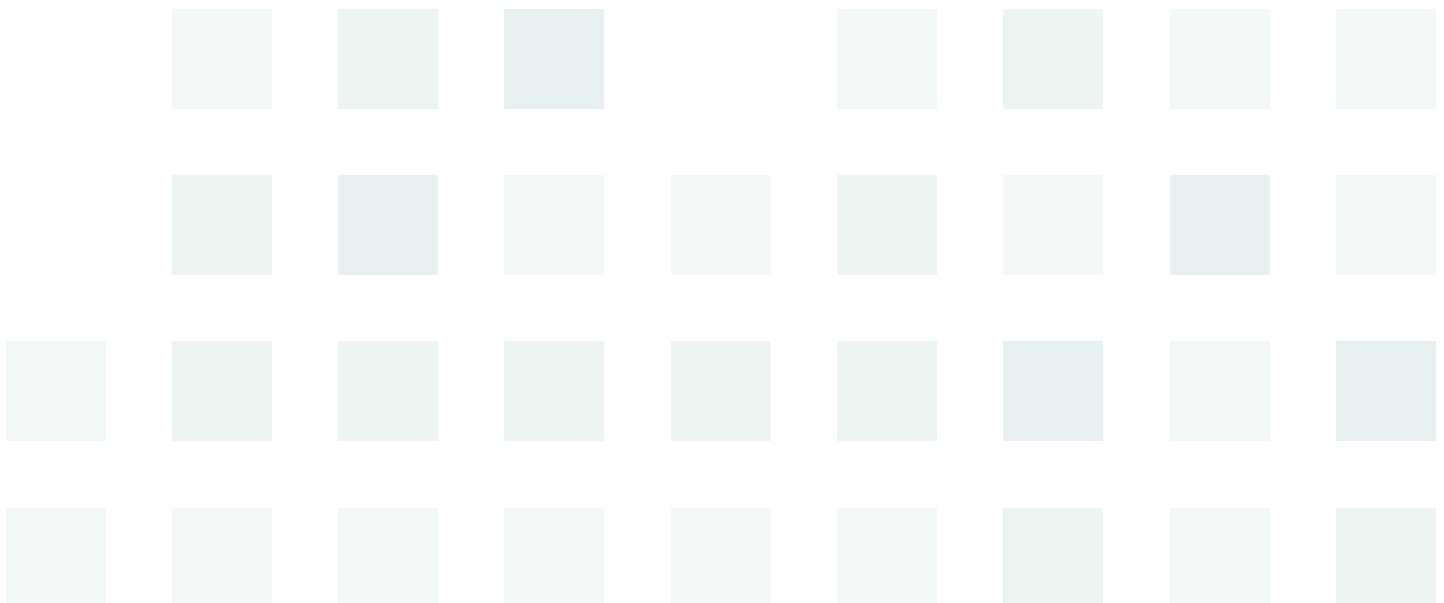
**9.27** ODPM Circular 01/2006 acknowledges the difficulties that many rural authorities face in terms of the supply of affordable land to meet the accommodation needs of Gypsies and Travellers. Consequently, while development within the Green Belt is normally inappropriate, authorities in this situation should consider including a 'Rural Exception Policy' in their DPDs and bear in mind the possibility of adjustments to Green Belt boundaries which can be made in exceptional circumstances for the provision of Gypsy and Traveller sites.

## Joint Working / Cross-Boundary Working

**9.28** It is recognised that the delivery of additional pitches and plots will be challenging for many local authorities and it is therefore suggested that a collaborative approach may benefit some of the issues involved. The delivery of new accommodation for Gypsies, Travellers and Travelling Showpeople must be seen within the wider agendas of community cohesion and social inclusion. Local authorities are encouraged to consider undertaking community development work to secure improved community understanding of the issues involved and to develop local leadership in order to drive forward a sustainable pattern of delivery.

## Monitoring

**9.29** Progress on the delivery of new accommodation by each LPA will be monitored through the Annual Monitoring Report (AMR). The HCA will be partners with the regional bodies monitoring this and will include the results in its Single Conversation work with local authorities.





# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Appendix 1

### Summary of National Policy Background

The Government is committed to increasing the levels of authorised site provision for Gypsies, Travellers and Travelling Showpeople. The Government established a new policy framework to significantly reduce the current levels of unauthorised camping and avoid the problems that some unauthorised sites can cause, for example increased tension between Gypsies and Travellers and the wider community and costs to the local taxpayers.

In attempting to tackle these inequalities and specifically to resolve the problems which unauthorised development and camping can create, the Government expects local authorities to take a balanced approach by carrying out effective but fair enforcement of planning policies and by working to develop new sites and improve existing ones. The Government believes that well managed, authorised sites can provide a solution for all concerned, and in support of this the Department for Communities and Local Government (CLG) provides capital funding through the Gypsy & Traveller Site Grant Programme. The Grant Programme is expected to make £97million available nationally to local authorities and Registered Social Landlords over the 2008-2011 period,

with innovative approaches to site delivery being encouraged.

Moreover, Gypsies, Travellers and Travelling Showpeople have an important part to play in terms of the delivery of new sites, with many likely to be established through private funds. In relation to this and to enable Gypsies, Travellers and Travelling Showpeople to make self-provision, Government requires Local Planning Authorities to allocate sufficient land in their Local Development Frameworks (LDFs) to meet pitch / plot requirements for both social and private sites and respond positively to Travellers seeking guidance in regards to the overall planning application process.

### ODPM Circular 01/2006

The Government's position on addressing the issues brought about by unauthorised camping and development has been developing for some years, with new Policy statements being issued in 2006 and 2007. ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites was issued on 2 February 2006 and put in place a legislative framework for planning Gypsy and Traveller sites, with local authorities having to address the unmet need of Gypsies and Travellers within their area (need for accommodation to be identified through an assessment of accommodation needs, as required under the Housing Act 2004).

The Circular defines Gypsies and Travellers and recognises that some may well have a lifestyle of active travel and be self-employed in occupations such as seasonal agricultural work but that some Travellers may have a more settled lifestyle, as they work in trades which require lesser mobility or no longer travel due to issues of health and/or age.

### CLG Circular 04/2007

CLG Circular 04/2007: Planning for Travelling Showpeople was issued on 21 August 2007 and acknowledged that previous Guidance (Circular 22/91) had failed to deliver adequate sites for Travelling Showpeople. The Circular indicated that the needs of Travelling Showpeople should be treated in a similar way to those of Gypsies and Travellers and that Gypsy and Traveller Accommodation Assessments are to include the needs of Travelling Showpeople, which will then be incorporated into revised Regional Spatial Strategies (WMRSSs) and Local Development Plans (LDPs).

The Circular defines Travelling Showpeople in relation to their distinctive occupations – fairs, rides and amusements with associated catering and other stalls – which result in a pattern of frequent travel for short periods of time.





# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## The Green Belt and Sites in Rural Areas

ODPM Circular 01/2006 also acknowledges the difficulties that many rural authorities face in terms of the supply of affordable land to meet Gypsies' and Travellers' accommodation needs. Consequently, it states that authorities in this position should consider including a Rural Exception Sites Policy in their Development Plan Documents and that while development within the Green Belt is normally inappropriate, adjustments to Green Belt boundaries can be made, in exceptional circumstances, for the provision of Gypsy and Traveller sites.

## Connecting Traveller Accommodation Need to General Housing Need

Gypsy and Traveller and Travelling Showpeople policy does not and should not operate in isolation, and the Government has signalled its intention for Gypsy, Traveller and Travelling Showpeople accommodation to be planned for and delivered in the same way that all other housing is provided. In relation to this intention, several recently introduced changes should have a positive impact upon the delivery of new sites in the future.

## Housing Green Paper: More Affordable, More Sustainable

The Housing Green Paper, published in July 2007, set down new expectations in relation to an enhanced role for local authorities in creating a 'strategic vision' for housing policy and delivery across their communities. This 'strategic vision' should encompass the needs of all sections of the community, which includes the needs of Travellers and is intended to encourage the incorporation of accommodation needs of Gypsies, Travellers and Travelling Showpeople as part of general housing provision in the future.

## The Housing and Regeneration Act 2008

The Housing and Regeneration Bill received Royal Assent in July 2008 and will help to deliver the commitments set out in the Housing Green Paper, namely to provide more and greener homes, in mixed and sustainable communities. One of the key features of the Bill was the decision to merge the Housing Corporation (which delivered Social housing) and English Partnerships (which delivered large scale regeneration projects). A new single National Agency known as the Homes and Communities Agency (HCA) became formally operational on 1 December 2008. One of the HCA's responsibilities is the delivery of the national Gypsy & Traveller Site Grant Programme, acting on the advice of the Regional Housing Executive in terms of funding bids from local authorities and RSLs. The HCA will assist through its expertise in delivering challenging projects.





# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Appendix 2

### Key stages in the Gypsies, Travellers and Travelling Showpeople element of the WMRSS Revision Phase 3 Process

#### 1. Assembling an Evidence Base

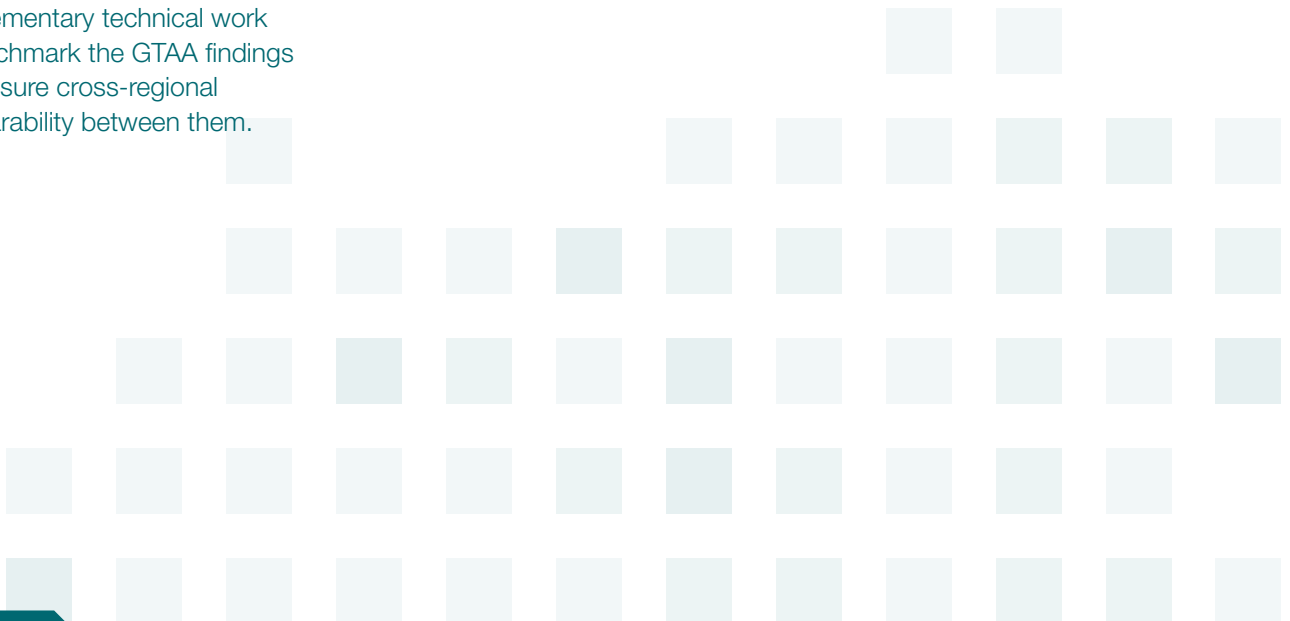
- Completion by the local authorities of their six sub-regional Gypsy and Traveller Accommodation Assessment (GTAA's) in 2007/2008.
- Establishment of an WMRSS Gypsy and Traveller Reference Group (local authority officers and representatives from other stakeholder organisations) in summer 2008, to advise on the process of engagement and the development of policy.
- Production of a Regional Overview of the sub-regional GTAA's.
- Submission of advice from Strategic 4 (4) Planning Authorities.
- Supplementary technical work to benchmark the GTAA findings and ensure cross-regional comparability between them.

#### 2. Development of 'Options' for new Regional Planning Policy

- Consideration of other Regions' approaches to the development of Options where they were further advanced in their respective WMRSS Revision processes.
- Consideration of outcomes from WMRSS Examinations in Public in other Regions, e.g. South West, East of England.
- Contributions made by members of the WMRSS Gypsy & Traveller Reference Group and by individual Gypsies, Travellers and their representatives.
- Development and appraisal of 'Scenarios' to identify merits and limitations of potential re-distributive Options.
- Commissioning of a 'Constraints and Opportunities' mapping exercise to indicate, in general terms, the broad availability of land within each District to accommodate new provision.

#### 3. Consultation on 'Options' for new Regional Planning Policy

- Three Options for new Policy on the provision of permanent pitches for Gypsies and Travellers,
- An Option on the provision of transit pitches and
- Two Options on the provision of plots for Travelling Showpeople.
- Period of public consultation ran between 29 June – 14 August 2009.
- Consultation events facilitated with Gypsies and Travellers in the West Midlands Region – events were held in Hereford, Nuneaton & Bedworth, Stoke-on-Trent, Telford and Worcester.
- Distribution of a questionnaire to the Travelling Showpeople community, via the West Midlands Branch of the Showmen's Guild.







# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## 4. Assessment of Responses Submitted to the Options Consultation

- Collation and assessment of responses undertaken by WMRA consultants, URSUS Consulting, between August – October 2009.
- Assessment of responses to Gypsies, Travellers and Travelling Showpeople element of WMRSS Phase 3 Options consultation completed by the Centre for Urban and Regional Studies, University of Birmingham, in October 2009.

## 5. Development of Interim Policy Statement

- Formulation of a Statement undertaken by WMRA between October 2009 – March 2010.
- Formal comment sought from local authorities on the draft Statement – November 2009.
- Input by WMRSS Gypsy & Traveller Reference Group – November 2009.
- Consideration of representations received and amendment to the draft.
- Input from the WMRSS 3 Reference Group 5 Jan 2010 and the WMRSS Policy Leads and Coordination Groups both on 6 Jan 2010.

## 6. Endorsement and Adoption of Interim Policy Statement

- Consideration by West Midlands Regional Assembly Board at its meeting on 15 January 2010.
- Consideration by the Regional Planning and Environment Executive (RPEE) at its meeting on 23 February 2010.
- Approval by the full Regional Assembly at its meeting on 17 March 2010.
- Ratification by the Joint Strategy and Investment Board (JS&IB) at its meeting on 23 March 2010 (as well ratification by the West Midlands Leaders Board (WMLB)).
- Submission to GOWM on 31 March 2010.





# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Appendix 3

### Derivation of Preferred Option Allocation of Additional Residential Pitch Requirements

Local authority	Consultation Option 1	Provision in Interim Policy Statement	Derivation
Cannock Chase	35	35	Need where it arises from GTAA
East Staffordshire	15	15	Need where it arises from GTAA
Lichfield	11	14	Increased allocation for pitches (3) diverted from South Staffordshire
Newcastle under Lyme	20	20	Need where it arises from GTAA
South Staffordshire	50	42	Reduced to 42 pitch allocation; pitches diverted to Lichfield (3), Sandwell (2) and Telford & Wrekin (3)
Stafford	37	37	Need where it arises from GTAA
Staffordshire Moorlands	2	2	Need where it arises from GTAA; unrealistic to increase allocation because of isolation from existing areas of Gypsy and Traveller settlement and lack of evidence of demand to live in the area
Stoke on Trent	40	40	Need where it arises from GTAA
Tamworth	7	10	Increased allocation for pitches (3) diverted from Rugby
North Warwickshire	10	16	Increased allocation for pitches (6) diverted from Rugby
Nuneaton & Bedworth	29	29	Need where it arises from GTAA
Rugby	66	42	Reduced to 42 pitch allocation; pitches diverted to Tamworth (3), North Warwickshire (6), Warwick (3) and Coventry (12)
Stratford on Avon	52	42	Reduced to 42 pitch allocation; pitches diverted to Warwick (7), Redditch (1) and Solihull (2)
Warwick	13	23	Increased allocation for pitches diverted from Rugby (3) and Stratford on Avon (7)



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

Local authority	Consultation Option 1	Provision in Interim Policy Statement	Derivation
Bromsgrove	3	14	Increased allocation for pitches (11) diverted from Wychavon
Malvern Hills	33	33	Need where it arises from GTAA
Redditch	0	14	Increased allocation for pitches diverted from Stratford on Avon (1) and Wychavon (13)
Worcester	22	22	Need where it arises from GTAA
Wychavon	66	42	Reduced to 42 pitch allocation; pitches diverted to Bromsgrove (1) and Redditch (13)
Wyre Forest	44	42	Reduced to 42 pitch allocation; pitches diverted to Dudley (2)
Birmingham	19	19	Need where it arises from GTAA
Coventry	3	15	Increased allocation for pitches (12) diverted from Rugby
Dudley	21	23	Increased allocation for pitches (2) diverted from Wyre Forest
Sandwell	3	5	Increased allocation for pitches (2) diverted from South Staffordshire
Solihull	26	28	Increased allocation for pitches (2) diverted from Stratford on Avon
Walsall	39	39	Need where it arises from GTAA
Wolverhampton	36	36	Need where it arises from GTAA
Herefordshire	109	109	Need where it arises from GTAA; allocation remains unchanged because of the extent of unconstrained land
Shropshire	93	93	Need where it arises from GTAA; allocation remains unchanged because of the extent of unconstrained land
Telford & Wrekin	34	37	Increased allocation for pitches diverted from South Staffordshire



# Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

## Appendix 4

### Justification for 14 Pitches Minimum Allocation

In consultation Option 3, a minimum 14 pitch allocation for each local authority was adopted to achieve redistribution to increase choice for Gypsies and Travellers and to increase deliverability by spreading responsibility for provision more widely between local authorities. This followed the approach adopted by the East of England Regional Assembly in its Preferred Option for its Single Issue Review where a minimum of 15 pitches was adopted. In the West Midlands the pitch number was amended downwards by one pitch because overall requirements are lower than in East of England.

The East of England approach, including the minimum pitch allocation, was thoroughly tested at Examination in Public and was broadly endorsed in the Panel Report, and in the Secretary of State's Proposed Changes, and finally in the revision to the East of England Plan.

Justification for setting a pitch minimum at about this level comes from the CLG report Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies (2007), page 52 which refers to alternative means of dispersing requirements between areas of high and low need:

*'Again, there is unlikely to be evidence unless it is provided in GTAA's (and some have attempted to discover locational preferences) and/or advice from local authorities. We think that:*

*➤ EITHER dispersion should be relatively modest in terms of distance and extent. For example, where an LPA with high need generated by current provision adjoins one with no site provision, some of the requirements might be 'diverted' to the adjoining area, especially if road links between the areas are good. This would enable existing community and family links to be maintained. Such possibilities might be identified from the maps at Q2.*

*➤ OR new areas of site provision should be positively planned, and should be sufficiently extensive to create a viable local community. A 'viable' community should probably be at least 15 pitches with the possibility of extension to accommodate extended family members and family growth in the future, and should be well supported. Planned 'new' communities should, of course, meet other positive criteria for sites including especially employment opportunities and good road access.'*

Justification of the 14/15 pitch minimum is in the second bullet. It is clear that this is intended as a viable community, but could include either a single site or several smaller sites. The approach now adopted in the West Midlands essentially seeks to combine both aspects suggested by the CLG report.

### Justification for 42 Pitches Maximum Allocation

In allocating additional pitch requirements, factors relating to equity and the practicalities of delivering high numbers of new pitches were considered and it is therefore proposed that no authority should be expected to provide more than 3 times the minimum allocation (i.e. 14 pitches X 3 = 42 pitches). In effect, this capping of allocations allows recognition to be given to those authorities which have made a significant degree of provision to date, in comparison to authorities which have made limited provision.





# Sub-Regional Apportionment of Construction Aggregates

## Policy Objective

- 1. To produce new sub-regional apportionments for construction aggregates for the West Midlands for the period 2005 – 2020 and to provide advice to Mineral Planning Authorities (MPAs) on extending those apportionments up to 2026.
- 2. Construction aggregates (sand and gravel and crushed rock) are essential to built development, other construction and maintenance of infrastructure (e.g. roads, flood defences). They are therefore essential to deliver growth, create and maintain sustainable communities and to sustain Urban and Rural Renaissance in the West Midlands.

## Key Messages from the Phase Three Options Consultation

- 3. The suggested aggregates apportionment was not considered realistic. There was a considerable body of opinion which considered that the apportionment was too high for Staffordshire, and some were of the view that it was too high for the region as a whole. Most of those responding supported an apportionment using different sub-regions and methods, although there was some resistance to using the sub-regions proposed by the Section 4(4) authorities.

## Background

- 4. In order to maintain adequate and steady supplies of materials on the one hand, and protect valuable landscapes and communities on the other, a national managed aggregates supply system operates providing guidelines for regional provision.
- 5. The Government determines the future national requirements for aggregates and apportions it between the regions based on past production, regional shares, future levels of construction activity and growth to give a regional requirement. (National and Regional Guidelines for Aggregates Provision in England: 2005-2020 June 2009).
- 6. The 2003 guidelines were apportioned sub-regionally by the Regional Planning Body following advice from the West Midlands Regional Aggregates Working Party (WMRAWP) and incorporated into the West Midlands Regional Spatial Strategy (June 2004) as Policy M2 (of the WMRSS) following an examination in public. The 2003 national and regional guidelines and sub-regional apportionment set out in Policy M2 cover the period up to 2016. The figures need to be reviewed and projected forward to cover the period up to 2020 to ensure supplies are available to meet future needs.
- 7. Across the country there are geographical imbalances between the supply of, and demand for, aggregates at national level and therefore a mixture of sites is needed to contribute to meeting local, regional or national demands. This imbalance is reflected in the West Midlands region by the

relationship between consumption in urban areas and the provision of supplies of primary aggregates from mainly rural areas particularly from Staffordshire for sand and gravel and Shropshire for crushed rock.

- 8. However not all the material produced and sold in the region is consumed in the West Midlands region. Based on the most recent information (AM2005 Collation) 87% of the sales were consumed in the West Midlands. As a whole the West Midlands consumed 17,827million tonnes of aggregates in 2005 of which 33% were imports. Of that 33% ninety three percent was crushed rock imported from other regions and Wales.

- 9. The draft revision to the WMRSS Phase 2 (covering the period up to 2026) proposes major new housing development across the region, additional employment sites and the development of a better transport system.

- 10. This level of future growth may require additional materials to be found by defining areas for new minerals extraction. However, demand for resources could be reduced by reducing the quantity of material used in new construction, and maximising the use of alternative materials in construction projects wherever possible.



# Sub-Regional Apportionment of Construction Aggregates

## Policy Position

**11.** The Government published a new regional guideline in June 2009 for the West Midlands which requires 370 million tonnes of aggregates and alternate materials to be provided over the period 2005-2020.

**12.** This comprises the production of 247 million tonnes of primary aggregates (165 million tonnes of sand and gravel and 82 million tonnes of crushed rock), and assumes that 100 million tonnes of alternate materials will become available and 23 million tonnes of materials will come from imports outside the region during the 16 year period of the guidelines.

**13.** In the absence of mechanisms to apportion the alternate materials requirements amongst the various Mineral Planning Authorities in the region, the figure of 247 million tonnes for primary aggregates was used to carry out the sub regional apportionment.

**14.** The West Midlands Regional Assembly carried out two technical consultations with WMRAWP members on eleven options, six derived from the WMRAWP based on past sales, increased proportions of recycled aggregates and substitutions between mineral types; and five alternative options produced by consultants.

**15.** The methodology developed by the consultants to generate the five 'alternative' options was based on consideration of a range of criteria, including the location of the mineral resources, past sales, potential future demand and environmental constraints. By applying different weightings to the various factors five 'alternative' options were produced and they were:-

- Supply led
- Growth led
- Environment led
- Equal weighting to all the factors
- Demand and resource

**16.** In response to comments made during the first consultation about the datasets, weightings and the five options not being considered to be deliverable or sustainable, the consultants produced two further refined options, based on past sales and phasing. These further two options, together with a past sales option were considered by the WMRAWP and the Regional Planning and Environment Executive before a final decision was made by the Regional Assembly Board on the 17th March 2010.

**17.** The Regional Assembly took into account the information and evidence from the consultations, the technical advice from the WMRAWP and the results of the Habitats Regulations Assessment and the Sustainability Appraisal/Strategic Environment

Assessment and agreed that the regional guidelines could be met at an acceptable environmental cost. They also agreed that the apportionment methodology which represented the most practicable, realistic and sustainable option capable of being delivered was Option F for both sand and gravel and crushed rock.

**18.** The adopted method applied is based largely on past sales but takes into account the distribution of demand and the availability of relatively unconstrained sand and gravel and crushed rock resources in the region. For the purposes of carrying out the apportionment of both sand and gravel and crushed rock a 10 year average (of past sales) was chosen to reflect the need for a better indication of trends over time and would be based on the period 1998 - 2007.

**19.** Table 3 is the sub-regional apportionment up to 2020 agreed by the Regional Assembly following technical advice from the WMRAWP and the constituent Mineral Planning Authorities.





# Sub-Regional Apportionment of Construction Aggregates

**Table 3: Apportionment of the Regional Guidelines 2005-2020 (million tonnes) provision by existing Sub-Regions.**

	Annual Provision Sand & Gravel	Annual Provision Crushed Rock
Herefordshire	0.462	0.364
Worcestershire	1.009	0.157
Shropshire	1.496	2.647
Staffordshire	5.662	1.210
Warwickshire	1.154	0.745
West Midlands County	0.528	0
<b>Regional - Annual Total</b>	<b>10.31</b>	<b>5.12</b>
<b>Regional Total 2005-2020</b>	<b>165</b>	<b>82</b>

+ West Midlands County Apportionment redistributed between the other counties in 2006.

**20.** In determining the requirements beyond 2020 the MPAs will have to project the agreed figures at a constant value for a further period of 6 years up to 2026. This is based on advice from CLG when determining the likely sub-regional apportionment for the period 2016-2021 (which was the end date of the current WMRSS) from the previous National and Regional Guidelines (June 2003).

**21.** Mineral Planning Authorities will need to plan to maintain appropriate land banks for sand and gravel and for crushed rock, which is sufficient to deliver 10.31 million tonnes and 5.12 million tonnes per annum respectively across the region.

**22.** Mineral Development Plan Documents (DPDs) should include policies that reflect the new sub-regional provisions for sand and gravel and crushed rock following the redistribution of the sand and gravel future provision amongst the various mineral planning authorities as a result of the

application of the new sub-regional apportionment methodology.

**23.** MPAs in collaboration with local planning authorities and the minerals industry should ensure that economically important aggregate mineral resources in the region are safeguarded and that aggregates and aggregates-related infrastructure are safeguarded particularly existing and planned rail depots in order to meet future demands.

**24.** It will be essential to ensure that production is maintained from existing and planned aggregates sites and aggregates and aggregates-related infrastructure by limiting encroachment from non-mineral development through applying buffers or consultation zones.

**25.** The sub-regional provisions for both sand and gravel and crushed rock should be subject to testing of practicality and environmental acceptability in the preparation of mineral DPDs including through Sustainability Appraisal/Strategic Environment Assessment and Habitats Regulations Assessment. Mineral DPDs must consider the potential adverse effects of aggregates extraction, processing and transportation on the integrity of European nature conservation sites and adopt measures to avoid those adverse effects.

**26.** The regional guideline will be reviewed annually and revised when necessary according to Mineral Policy Statement No1 (annex 1 paragraph 5.1). The delivery of the sub-regional provision will need to be monitored on an annual basis and reviewed before 2015 or as part of the preparation and approval of the Regional Strategy.



# Sub-Regional Apportionment of Construction Aggregates

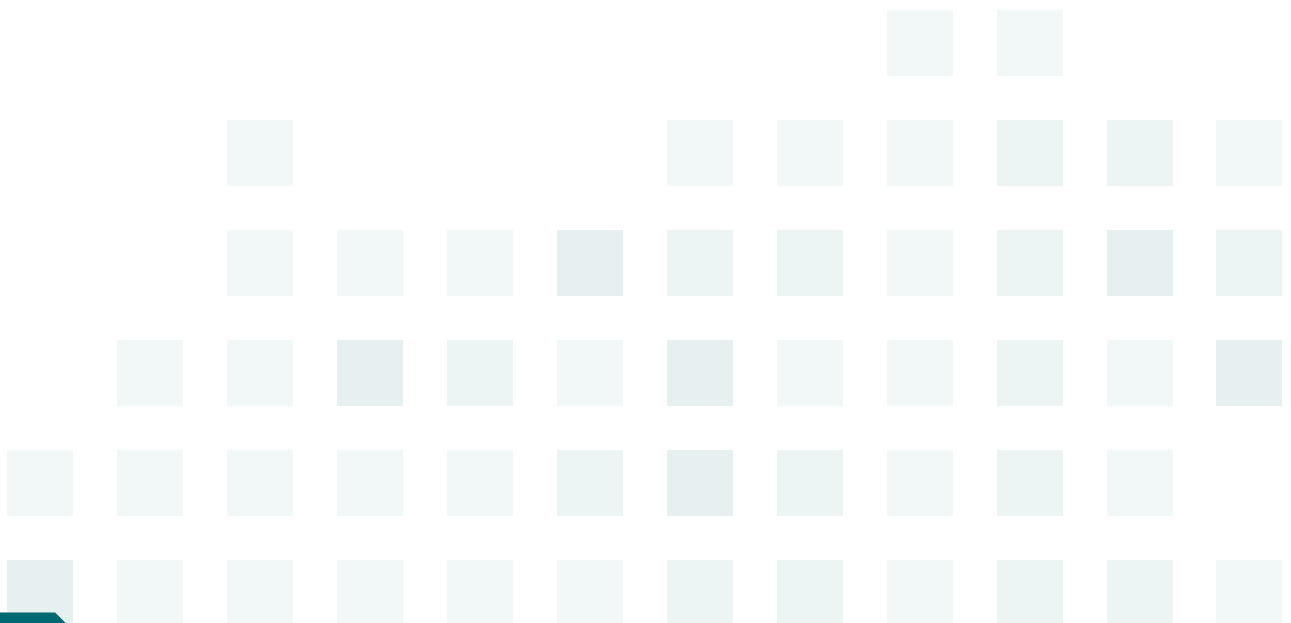
## Contribution of Alternative Materials to Future Supply

**27.** The Government's regional provision includes a requirement to provide 100 million tonnes of alternative materials over the period 2005-2020. This is an increase in the contribution towards total aggregates provision from 24% to 27% and an increase of 17.5% for the annual requirement – 5.5 million to 6.66 million tonnes.

**28.** The quality of the available data is not sufficiently robust to determine reliable geographical area based local apportionments for alternate materials. However, Policy W9 in the revised draft WMRSS (Phase 2) requires new sites for facilities to store, treat and recycle soils and construction and demolition waste to be provided and for more recycling through on-site activities and purpose-built facilities in urban areas.

**29.** MPAs in their LDFs will need to consider if there is sufficient capacity to deliver the increase level of recycling now required. They will also need to consider what other measures they can take to maximise the use of alternative materials in local construction projects.

**30.** The delivery of this increase in use of alternative materials will require better collection of data (e.g. through regular WMRAWP surveys of secondary aggregates, waste management capacity monitoring, and monitoring of on-site recycling through the development management process) and greater emphasis being placed on the reuse and recycling of on site materials particularly in the Major Urban Areas subject to environmental considerations being met.



# WMRSS Phase Three Revision Policy Recommendations

## Policy Objectives

The revision objectives, as set out in the WMRSS Phase Three Project Plan are to identify:

- The role, if any, that service provision plays in enhancing the sustainability of rural communities;
- Whether particular services are critical to enhancing the sustainability of rural communities, and if this is the case;
- Prioritise those services, particularly those which meet the needs of disadvantaged groups, in different types of rural areas, and;
- Whether different policy responses are required in remote and accessible rural locations.

## Key Messages from Options Consultation

64% of respondents to the Options consultation concurred that it is very difficult to define rural services as “important” or “critical” as perception varies by locality and over time. Whilst a prescriptive list of critical services would not be appropriate at a regional level, more detailed work on a settlement or district basis was considered a desirable outcome to support need as determined locally.

72% of respondents agreed with the view that more attention should be given to meeting the service needs of “accessible” rural areas; however, a counter point was apparent that there was no rationale for the precedence towards these areas as framed by the consultation questionnaire and that the needs of each community should be considered through

community planning approaches. 63% of respondents agreed with the premise that new developments should be allowed in settlements lacking a service base in order to help reverse a cycle of decline distinguishing such places. The emphasis was on meeting local needs balanced by appropriate service and infrastructure provision with the co-dependency role of rural settlement groups highlighted.

65% of respondents suggested a community-based approach to policy development with a number of respondents emphasising that this was compatible with a sustainable climate-driven approach. The majority of strategic authorities sought the status quo suggesting that Policy RR 4 could reasonably be supplemented by regional guidance to encourage the development of a range of locality-based approaches without the prescription that was implied in the “service reviews”.

In short the three options forwarded in the consultation, Climate-change driven, Community-based and Status quo were revealed to be an oversimplification of how communities of place work in relation to services supporting them and their ongoing sustainability.

## Supporting Text

Rural Renaissance remains one of the main challenges of the West Midlands Region. It is a key contributor to diversifying and modernising the economy and supporting appropriate housing. In short, with 80% of the region being Shire and containing 20% of the population the ability of such areas to be increasingly resilient, sustainable

places to live and work deserves ongoing recognition and support. The Region’s 2,300 villages perform an essential role in maintaining and enhancing the rural way of life. The Living Working Countryside Report (The Taylor Review 2008) and the Government’s response to it raises a clear expectation that the planning system will respond more positively to rural sustainability through its support for rural businesses and affordable housing development acting as a catalyst to sustainable places in terms of facilities and services such as shops, pubs, schools, local businesses, health and less visible welfare services. Many of the changes necessary to help achieve this will be small scale, incremental, locationally specific and founded upon community involvement. PPS4 Planning for Sustainable Economic Growth lends support to a thriving and dynamic countryside.

Studies demonstrate how difficult it is to make hard and fast conclusions about the viability of settlements as sustainable places based on service provision within a settlement or distance from a market town alone. Instead a complex picture emerges, supported by consultation responses, in which a fresh approach to sustainability is taken, including access to services but with increasing emphasis on shared experience, mutual support, self reliance, local resilience and social enterprise being valid contributors to social sustainability. This could be either based on a single or networked group of settlements: a community of place, beyond and between individual settlements.

Much of what makes places sustainable will, in practice, be influenced as much by how accessible the area is to market towns or major urban areas as it is to the type, range and scale of services and facilities that are available locally, including less tangible services such as rural broadband. Differing solutions will be required in the West Midlands for identifying how best to maintain and develop those rural services underpinning communities.

As examples, a number of initiatives have been developed in the West Midlands with a view to improving accessibility to services in rural areas including the Shropshire and Peak District Pathfinders which provide a “one stop shop” for public services.

Proactive community engagement is well placed as a tool or methodology to identify localised service centred community needs, particularly where it is used alongside other community led information sources such as Parish Plans to support Local Strategic partnerships and Local Planning Authorities in place making; delivering their Sustainable Community Strategies through Local Development Frameworks. As examples, Shropshire Council are currently mapping a process of community engagement with their rural areas due to start in early 2010 using a methodology based on the “Devon Toolkit” and the Welsh Assembly Government have commissioned a report on deep rural localities providing an evidence base of prioritised rural service needs.

The Panel Report into the WMRSS Phase Two Revision acknowledged the important aim of achieving rural renaissance and found the rural renaissance policies fundamentally

sound. It noted, however, the limited scope of that review and the narrow field of the WMRSS Phase Three Revision, being focussed as it had been on trying to define critical rural services.

The WMRSS Phase Two EIP Panel Report strongly implied that a clearer lead must be provided in meeting the challenges and objectives to address rural issues to address the failure in some areas to carry forward the agenda in practice. The West Midlands, with its strong Rural Renaissance emphasis, is well placed to take a strong lead in delivering inclusive communities as part of a living working countryside.

The WMRSS Communities for the Future Chapter, in particular Policy CF2 and Rural Renaissance policies, emphasise the importance of understanding local needs both for affordable housing and promoting local regeneration and support for retaining or achieving new services designed to meet those needs. As we move forward with policy development, the region should apply an approach based on community intelligence and preference that must be seen as part of the apparatus used by Local Authorities in planning to meet local need in their rural areas.

This recommendation feeding into the Regional Strategy presents an opportunity to embed bottom up planning approaches, centred on delivery into practice. A shift in emphasis is recommended rather than further policy review:-

➤ Policy RR4 already requires, through the Development and Local Transport Plan process, that in meeting the challenges of rural areas the maintenance,

improvement and facilitation of new and existing services should be sought locally, i.e. taking them to where people live, or in accessible locations, such as market towns and that the potential impact new development could have to support such service provision must be considered.

- Policy RR1 already draws a useful distinction between rural locations under the influence of the Major Urban Areas, which have generally good access to services in these but whose settlements are possibly less resilient as they are caught within their influence; and remote rural areas where access is generally poor but whose settlements often have greater self containment and are therefore more dynamic.
- Policy RR3 emphasises the critical service role of market towns providing for a rural hinterland.

The delivery gap identified does not point to regional prescription about which services are, or are not, critical as this is demonstrated to change with time, place, accessibility and proximity, community maturity etc; it points to the importance of understanding what local people and communities in rural areas want from their services and service providers.

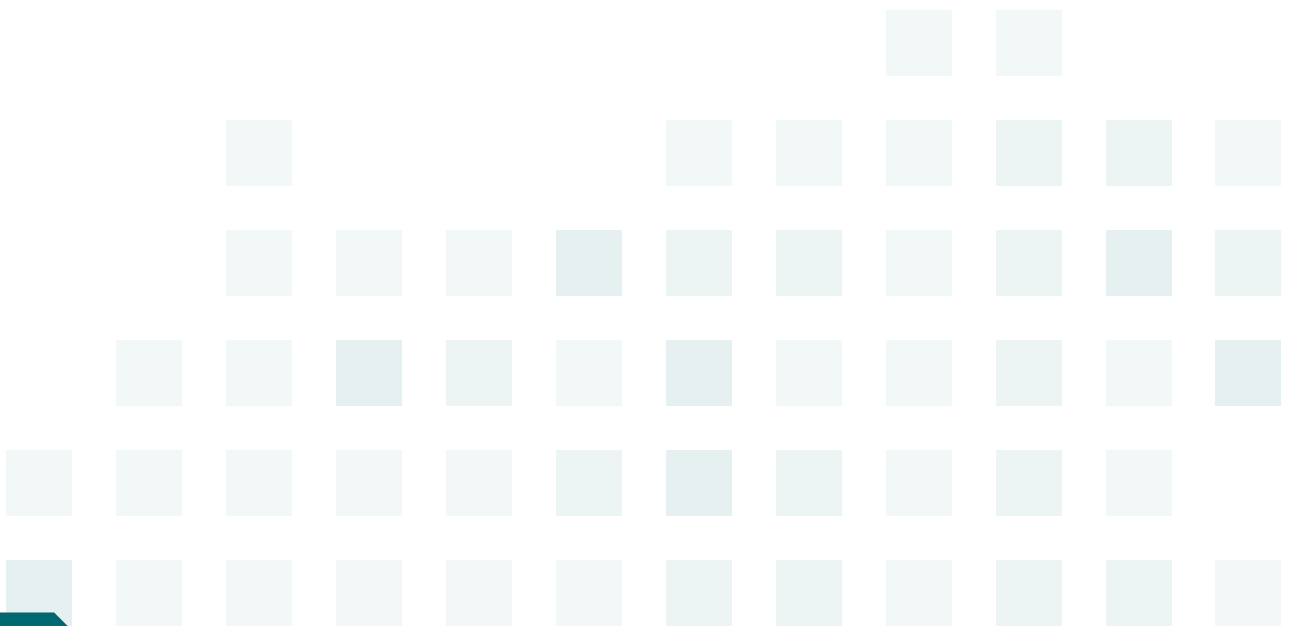
It suggests a need for consistency in adopting a community responsive approach to the LDF process, which clearly identifies community needs and aspirations and supports innovative approaches towards plan led delivery through local Investment and Implementation plans.



## Recommended Policy Approach

Any review of policy for the new Strategy for the West Midlands should provide a strategic framework which must:

- Not be prescriptive about which services are “critical” or key.
- Provide a framework for locally based analysis centred on “community of place”.
- Recognise that “sustainability” is multi-layered and that low carbon solutions may apply equally to some rural based services.
- Tie in Rural Renaissance policies with Communities for the Future policies showing clear links.
- Require Local Planning Authorities in their plan making and development management process to take into account legitimate local service needs of rural communities and what contribution can be made towards delivering more sustainable places based on local intelligence.
- Require Local Planning and Transport Authorities to demonstrate how their LDF’s and LTP’s have used tested and/or innovative approaches to locally led reviews to assess rural service provision at a scale appropriate to the locality and to demonstrate how this delivers the Regional Strategy, and local Spatial Strategies addressing rural settlements.
- Be clear about the approach to be adopted as to how local development may usefully contribute to local regeneration and needs, i.e. locally identified (bottom up community led) service, facility and infrastructure needs including affordable housing.
- Be able to demonstrate through their Local Implementation Plan or Single Conversation Investment Plan how this evidence is to be used to guide delivery matched to that need.
- Be clear how local community plans such as Parish Plans have been taken into consideration in establishing a coherent strategy for rural renaissance.
- Be able to demonstrate how the resilience of cross-border communities has been supported.



## Context

The West Midlands has lower participation in most culture and sports activities compared to the national average. This Policy Recommendation aims to ensure that Culture and Sport is embedded in the Regional Strategy so it can effectively contribute to addressing this fact and associated factors such as poor health and other issues around the regions poor regional profile, lack of regional identity and poor economic performance.

The role of Culture and Sport is recognised as an important tool in delivering sustainable communities and 'living places' to achieve urban and rural renaissance. There is a real challenge to be inspirational and break away from what has been described as a 'Lack of Culture of Culture' in the West Midlands <sup>1</sup> and to increase participation and engagement which, for residents, can:

- Improve health - physical and mental well-being;
- Improve education and help address social exclusion;
- Deliver safe, strong and sustainable communities;
- Improve achievement, e.g. sporting success.

Also, make the Region:

- More attractive to businesses, residents, visitors and in-movers as a result of the cultural offer;
- Support the growth and diversification of the regional economy;
- Achieve a positive regional image and identity.

The Department for Culture Media and Sport (DCMS) definition of culture is very broad. Some aspects of culture such as urban green space, the conservation and enhancement of the historic environment and tourism are covered by the other Policy Recommendations relating to the Quality of the Environment and Tourism and the Visitor Economy. This Policy Recommendation focuses on Arts, Sport, Museums, Libraries and Archives, and participation and engagement with the Historic Environment.

### DCMS define Culture as including the following sub-sectors:

- Arts
- Sports
- Museums, Libraries and Archives
- Heritage
- the Historic and Built Environment
- Parks and open spaces
- Tourism
- Creative Industries (film and radio, architecture, fashion, design and music)
- Children's play
- Festivals and Events

<sup>1</sup> Cultural Demand in the West Midlands, West Midlands Regional Observatory and Culture West Midlands (bmg research), 2009

## Key Messages from Options Consultation

The WMRSS Phase Three Options consultation focused on updating WMRSS Policy PA10 in the context of strategic cultural assets.

The key messages from the consultation include:

- A list of strategic cultural assets within a revised Policy PA10 was not wholly supported, as it could be inflexible – an indicative list across generic themes might be more appropriate.
- Policy should seek to protect, as well as improve, existing strategic cultural assets.
- There was support for developing a new policy to address strategic gaps in cultural assets and broaden the emphasis from primarily economic drivers to include social benefits such as health.
- Issues relating to quality and accessibility associated with cultural assets should be addressed. This includes improving the transport infrastructure; encouraging new facilities to be in accessible locations; improving access to green space and parks; and the need for local assessment of demand to identify gaps to fill.

## Background

The WMRSS Phase Three revisions for Culture, Sport and Tourism had a focus on updating existing WMRSS Policy PA10. With the progression of policy development from the WMRSS Phase Three Revision towards the preparation of the new Regional Strategy, it was decided to develop a broader based policy for Culture and Sport, learning from previous WMRSS work. A Policy Recommendation for Tourism and the Visitor Economy has been prepared separately to ensure that the policy recommendations align more closely with the current West Midlands Regional Economic Strategy (WMRES).

The Policy Recommendation for Culture and Sport was prepared jointly on behalf of the Regional Assembly by the four cultural agencies (Sport England, English Heritage, Arts Council and Museums, Libraries and Archives) at a West Midlands regional level, based on working arrangements set up by DCMS.

The four agencies identified some strong shared themes and issues based on national and regional strategies and evidence which have helped shape the Policy Recommendation. In developing policy, each agency identified three key national policy drivers, how each of those was manifested at a regional level and what

evidence base underpinned them (where available). These policy drivers are summarised below.

## English Heritage

- Enjoying the historic environment – participation in the historic environment (in terms of visiting a historic environment site) for the region is lower than the national average, across all adults and priority groups (black and minority ethnic, people with limiting illness or disabilities, lower socio-economic groups) [Taking Part Survey, 2005-2008].
- Understanding and valuing the historic environment – initiatives across the West Midlands (e.g. historic characterisation) are helping people to identify, protect and manage the historic environment and heritage assets, and to better appreciate what is distinctive and special about places. A Regional Landscape Framework (currently being prepared) will help to develop regional landscape guidelines. However, further work is necessary to regionalise national studies that demonstrate the social, economic and environmental value and take forward the Regional Historic Strategy.

- ↘ Conserving and enhancing the historic environment – the West Midlands has a higher percentage of listed buildings, scheduled monuments and registered parks and gardens at risk than the national average (but less conservation areas at risk) based on the 2009 Heritage at Risk Register.

## Museums, Libraries and Archives

- ↘ Continuous improvement in the quality of experience – regionally there is uneven provision and some services are at risk, in particular in Wolverhampton, Warwickshire, Walsall and Birmingham.
- ↘ Learning and Skills - greater participation in positive learning activities, improved access to learning materials and increased employment opportunities. Regionally, there are low levels of skills and high levels of worklessness.
- ↘ Sustainable Communities and their economies - greater social cohesion and social responsibility and introduction of new audiences to the service. Regionally, participation is above the national average but there is lower participation by skilled/unskilled working classes with lower incomes, the elderly, 14-19 year olds and minority groups.

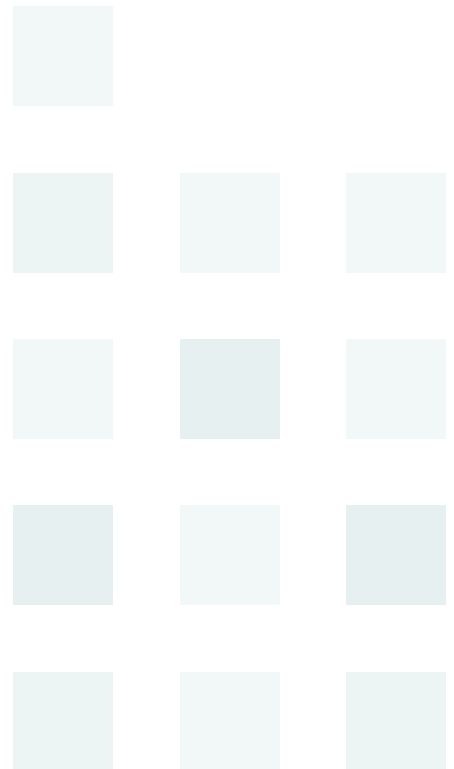
## Arts Council

- ↘ Increase engagement, particularly for children and young people– engagement of young people in positive activities in the region shows variation from the highest performing local authority nationally (Herefordshire) to six local authorities below the national average, the lowest being Birmingham, Dudley, Stoke and Sandwell. Priorities include a pilot to deliver the 5 hour cultural offer in Telford and opportunities in Birmingham, being Europe’s youngest city, and Building Schools for the Future. Engaging young people in culture can address the particularly low levels of educational attainment and high levels of youth crime in the region, for example, through Creative Apprenticeships. In terms of Adult Engagement, Birmingham is the least engaged core city in the UK. Arts engagement is below the national average in 10 of the 14 top tier local authorities in the West Midlands.
- ↘ Create a sustainable arts infrastructure – developing the arts offer in priority areas of regeneration such as Birmingham Eastside and pathfinders and addressing hard to reach communities through a Touring Strategy and digital media. Supporting the Arts sector to be sustainable, resilient and innovative.

- ↘ Growth in the Creative Economy – opportunities to address key regional issues such as worklessness, the low performing economy and capitalise on the regions strong industrial heritage.

## Sport England

- ↘ Grow – to increase participation in sport for young people (5 Hour Offer) and adults. The West Midlands has the lowest level of adult participation in sport in England, primarily in Birmingham, the Black Country, Stoke on Trent, Tamworth and Telford and Wrekin. Those who participate least include the economically deprived, women, ethnic minorities and the disabled.



➤ Sustain – to improve satisfaction with sports facilities. The Active People Survey shows the West Midlands satisfaction score is lower than the national average and the recently published Place Survey shows the West Midlands is the worst performing region on public satisfaction with sports and leisure facilities; the lowest levels being in Bromsgrove, Stoke, Birmingham and Sandwell. Issues identified through facility audits include the age and quality of sports facilities and/or a shortfall in supply.

➤ Excel – to develop talent and improve the region’s elite success. The West Midlands has several key sports assets, including Lilleshall National Sports Centre, Villa Park and Edgbaston Cricket Club, but there are some gaps in strategic elite sports provision, including a 50m swimming pool, which are needed not only for training and competing but also for hosting events, attracting visitors and improving the regional profile.

Further background information can be found in the Culture, Sport and Tourism Background Paper. In particular, it summarises research undertaken specifically to inform the WMRSS Revision - the BOP Report <sup>2</sup>. The research trialled an approach for mapping and ranking defined groups of strategic cultural assets and for identifying spatial gaps in the distribution of certain asset types across the region. It should be noted, however, that the research and criteria for mapping and ranking historic and natural assets were incomplete and inconsistent with national

designation criteria. The research also excluded any assessment of need.

## Recommended Policy Approach

The West Midlands suffers from a ‘lack of a culture of culture’ and a real cultural shift is needed to raise aspirations, increase participation and engagement, improve the quality, management and range of our facilities and access to them and strive for excellence in all the region does.

The West Midlands has some of the lowest participation in cultural activity of all the regions, in particular attendance of museums and galleries, arts events, visiting historic sites and sport. In contrast, participation is comparatively high for archives (although there are low numbers of participants overall) and libraries. The lowest participation in the arts, sport and museums/ libraries is located in Birmingham, the Black Country, Stoke on Trent, Staffordshire, and Telford and Wrekin.

The West Midlands population is also less satisfied, compared to a national average, with some of the cultural assets in particular sports facilities, libraries and parks and open spaces. In contrast, there is higher satisfaction with theatres and concert halls. The lowest satisfaction levels are in Birmingham, Sandwell, Dudley, Walsall, Staffordshire and Stoke on Trent.

The region also is the poorest economic performer with low or poor image compared to other

regions <sup>3</sup>, and culture and sport have their part to play in delivering economic growth. The lasting outcomes on the road to success will include delivering real sustainable communities, improving health, education and skills, and social inclusion, improving our economic performance and development of a positive regional profile.

An increase in the provision of cultural facilities and events, and in participation and engagement, however, should not give rise to negative impacts. New and improved provision and management of facilities should therefore: utilise sustainable transport in line with the WMRSS transport policies, taking into account any transport/ access issues in rural areas where alternative access/transport solutions might be needed; actively promote sustainable design and construction and high quality design (see draft WMRSS Policy SR3); and take place in an environmentally sustainable manner in line with the Quality of the Environment and climate change policies.

The Regional Strategy policy for Culture and Sport should develop the following policy principles:

1. Increase **participation and engagement**, focusing on those areas or cultural sectors with lowest participation/ engagement and/or lowest community satisfaction with cultural facilities. This should include action in relation to:-

<sup>2</sup> Mapping and Gapping Analysis of Cultural Assets in the West Midlands, WMRA (Burns Owen Partnership Report) August 2008

<sup>3</sup> Regional Perceptions Indicator - West Midlands Report, WMRO, November 2009.



## a. Places

Deliver 'living places' through improvement to the quality of, and access to, existing cultural and sports infrastructure to improve the quality of experience and promote a sustainable network of cultural assets. This should be informed by strategic and local assessment of needs and opportunities.

Measures should include:

- Transformative interventions where participation is the lowest.
- Seizing opportunities through investment initiatives and partnership working such as growth points, Building Schools for the Future and co-location.
- Conserving and enhancing heritage assets and encouraging opportunities for enjoyment and increased interest in, and participation with, the historic environment in line with the Policy Recommendations regarding the Quality of the Environment.

Encourage the provision of new culture and sports assets where national, regional, sub-regional and local assessments indicate shortfalls in supply or where innovative viable opportunities are proposed. Strategic and innovative culture and sports assets, to include those

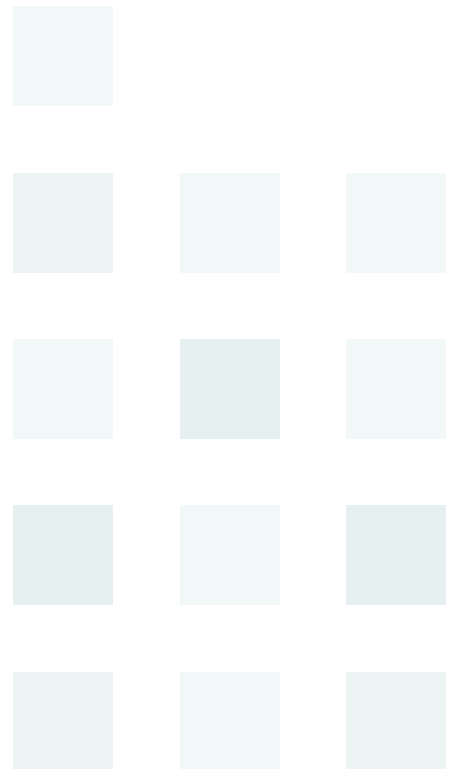
to be identified in the forthcoming Sports National Governing Body Whole Sports Plans, should be supported where they meet other policies in the Regional Strategy.

## b. People

Encourage a long term cultural shift in attitudes, aspirations and behaviours, targeting low participating/engaged groups through research, strategic and local advocacy, outreach, increasing volunteering, investment and marketing to raise aspirations and address other barriers to participation and engagement so as to widen access to cultural activities and opportunities.

Culture and Sport should be used to support the building of prosperous communities, to reduce the gap in economic growth rates between the West Midlands and other regions and to promote regeneration and tackle deprivation. In particular, this should include supporting the development of a positive regional image and perceptions, the role of Birmingham as a global city and the sustainable economic growth/diversification of the region (see Policy Recommendation on Tourism and the Visitor Economy) in order to:

- Encourage innovative and efficient opportunities
- Strive for excellence by:
  - Addressing strategic gaps in the regions cultural and sporting infrastructure,
  - Improving and developing existing strategic assets and services to provide high quality sustainable cultural opportunities,
  - Hosting major cultural events (e.g. target for Commonwealth Games) – facilities, spaces, promotion etc.
- Develop the cultural industry (including the creative industries) to provide employment, develop and expand skills.



# ➤ Tourism and the Visitor Economy

## Policy Objectives

The WMRSS Phase Three Revision aims to strengthen regional policy to meet the strategic, sporting and tourism needs of the Region and to support sustainable economic growth and regeneration.

This Policy Recommendation seeks to ensure that emerging policy reflects the nature and key characteristics of tourism and the visitor economy, identifies key synergies and opportunities, and sets a framework which promotes economic growth in the sector, while contributing to sustainable development and climate change objectives.

The visitor economy is recognised in the West Midlands Economic Strategy as a key growth sector for the region in terms of contributing to:

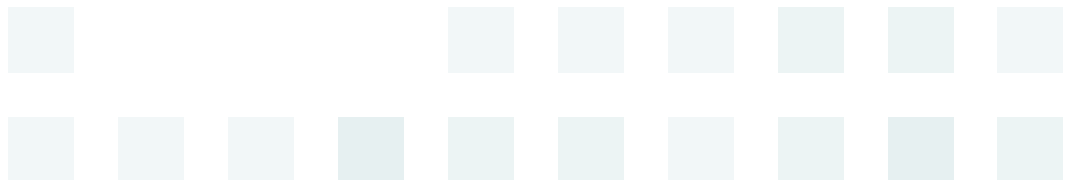
- Wealth and GVA generation;
- Urban and rural renaissance objectives;
- Creating new employment opportunities and diversifying the economy, whilst protecting and enhancing the environment.

Tourism and cultural facilities that contribute positively to the environment add to the creation of an attractive and welcoming 'sense of place'. They can generate a positive image and reputation for the region for businesses, residents, visitors and investors.

The visitor economy encompasses a broad range of activities and land uses. The UN World Tourism Organisation defines tourism as comprising "the activities of persons travelling to and staying in places outside their usual environment for not more than one consecutive year for leisure, business and other purposes".

## Key Components of the Region's tourism product

- Visitor Accommodation
- Visitor Attractions
- Business tourism and conference venues
- Sporting events
- Museums
- Heritage assets, including industrial heritage
- Historic and Built Environment
- Festivals and Events
- Cultural facilities, theatres
- Food and drink/restaurants
- Landscape/countryside
- Canal network
- Retail
- Transport infrastructure



# ➔ Tourism and the Visitor Economy

In planning effectively for the sector and facilitating sustainable growth, it is important that the emerging Regional Strategy reflects a clear understanding of the wide ranging nature of tourism activity. In addition to core visitor accommodation and attraction facilities which have historically formed the focus for spatial tourism policies, a large number of components and elements of environmental quality and infrastructure make up the tourism offer. Key components and areas where there are clear cross-cutting links with tourism are noted in the box (opposite).

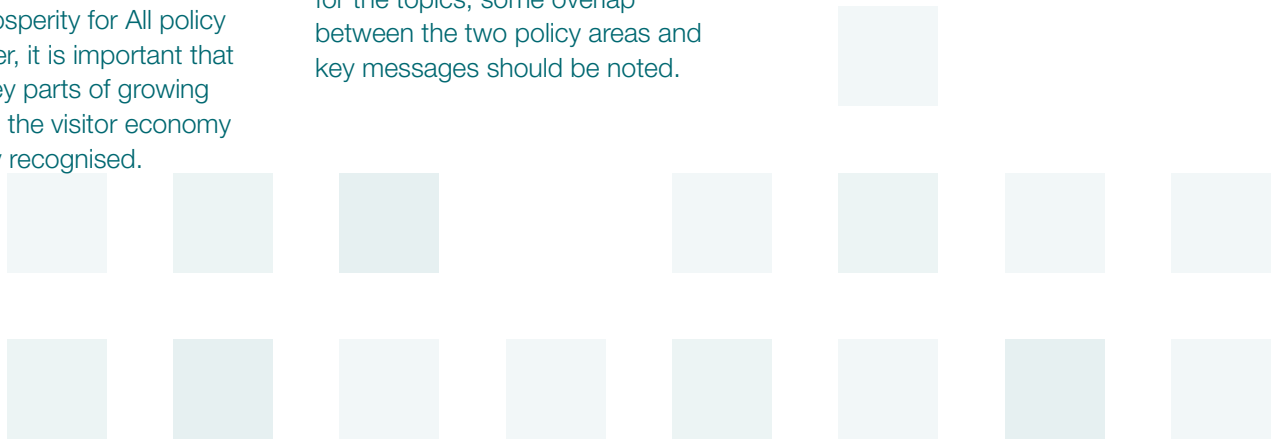
Transport infrastructure and arrival and departure points are key components of overall visitor experiences, the policy for which should be considered alongside key existing and new tourism facilities.

Many of these parts of the overall tourism product are addressed in their own right within other policy areas, in particular, the Quality of the Environment, Culture and Sport, and Prosperity for All policy areas. However, it is important that their role as key parts of growing and managing the visitor economy are specifically recognised.

This Policy Recommendation aims to set out an approach which promotes sustainable economic growth in tourism and the visitor economy, and to provide a clear understanding of key assets and the nature of tourism activity and its interaction with other key policy areas.

## Key Messages from Options Consultation

The WMRSS Phase Three Options consultation was focused on updating WMRSS Policy PA10 in the context of strategic cultural, sporting and tourism assets. It has subsequently been determined that, in the context of the emerging new Regional Strategy, this would be best served through preparing discrete Policy Recommendations on Culture and Sport and Tourism and the Visitor Economy. Nevertheless clear synergies exist between these areas. As consultation on the Phase Three Options was undertaken prior to taking the decision to develop discrete policy recommendations for the topics, some overlap between the two policy areas and key messages should be noted.



# ➤ Tourism and the Visitor Economy

Key messages on tourism from the options consultation include:

- Recognition of the synergies between cultural, sporting and tourism assets, but support for a clear economic rationale for policies in relation to tourism and the visitor economy. Recognition that tourism policy should contribute to overall regional sustainable economic growth and regeneration.
- There was support for developing a new policy for tourism, and that current WMRSS Policy PA10 did not reflect the nature and characteristics of the visitor economy at this time.
- While an exercise to identify strategic visitor and cultural assets has significant merit as the basis for policy preparation, it was recognised that the Burns Owen Partnership (BOP) report<sup>2</sup> which was undertaken as part of the WMRSS Phase Three work had limitations. Care also needed to be taken with definitions and in drawing inferences solely from supply-side data.
- Tourism policy should be informed by pertinent market intelligence, and volume and value data. Tourism is to a significant extent a market-driven activity and policy should be informed by an understanding of market demand and factors driving growth.
- Policy should seek to protect, as well as improve, existing strategic cultural and tourism assets, while taking prevailing market demand into account.
- While tourism is an important element of local economies, emerging regional policy for tourism should concentrate on strategic regional and national level products and issues.
- Need for an understanding in strategic policy development of the broad nature of tourism demand and activities, and relationships with other key policy areas.
- Recognition of the need to consider the environmental, transport, infrastructure and other implications of tourism activity, especially in environmentally sensitive areas and areas of high existing pressure.
- Consideration should be given to developing policies which recognise key destinations and hubs of visitor activity, in addition to individual assets.
- Issues relating to quality and accessibility associated with cultural assets should be addressed and include: improving the transport infrastructure; encouraging new facilities to be in accessible locations; siting of standard and consistent brown and white signs; improving access to green space and parks; and the need for local assessment of demand to identify gaps to fill. Also recognition that the private sector is responsible for delivery of a large component of a high quality tourism product.
- Accessibility and transport infrastructure are major issues in planning for future tourism growth. The majority of visitors travel to most destinations by car. At present, tourism public transport usage is often limited by mismatches between the visitor economy and a public transport system which is largely orientated towards travel to work and resident usage, i.e. peak leisure and visitor demand often is at weekends and evenings when frequency of public transport services is reduced.
- The need to manage tourism to maintain the environmental and heritage character of the region.
- The need to support small scale local visitor activity as well as major attractions.

<sup>2</sup> Mapping and Gapping Analysis of Cultural Assets in the West Midlands, WMRA (Burns Owen Partnership Report) August 2008

# ➤ Tourism and the Visitor Economy

## Supporting Text

The WMRSS Phase Three Revision for Culture, Sport and Tourism had a focus on updating existing WMRSS Policy PA10. While recognising the clear synergies between tourism and culture & sport, policy recommendations for each have been presented as discrete, albeit, closely linked topic areas.

This Policy Recommendation for Tourism and the Visitor Economy has been prepared by Advantage West Midlands on behalf of the West Midlands Regional Assembly, building on discussions with the Tourism West Midlands (TWM) Board and taking account of representations made by respondents on the WMRSS Phase Three Options consultation.

## National and Regional Strategy

DCMS's "Winning: A Tourism Strategy for 2012 and Beyond" sets a context for the sector, seeking to focus the industry to ensure the tourism benefits of the London 2012 Olympic Games are maximised. VisitEngland is responsible for tourism strategy at national level and a new tourism strategy for England is due to be published in March 2010 which will set economic growth targets for the sector.

At regional level, The West Midlands Visitor Economy Strategy (VES) sets a framework for sustainable growth, focusing on growth market opportunities in business tourism, culture, food and drink and festivals and events. Key policy references include:

- Tourism is a key sector of the region's economy. It generates expenditure and jobs in its own right and it contributes to the wider development of the economy as a whole. Tourism can and should make a significant contribution to the delivery of the WMES objectives, including "image and perceptions", not least as tourism has a key role to play in communicating strong, positive messages in the marketplace about the region and its assets.
- Tourism and culture have a key role to play in establishing the profile, image and contribution of Birmingham as a global city.
- The visitor economy makes a significant direct contribution to the regional economy through visitor expenditure and support for employment. This spend creates demand for new and additional services that leads to the creation and growth of small businesses.
- The visitor economy is a key driver of diversification; it can contribute to urban and rural renaissance and is part of the dynamic economy where innovation seeks to reduce the impact on the environment which in itself is an essential part of the tourism offer.
- Business Destinations: facilities for visitors are also used by the business community, whether at work or at play. They make an important contribution to choosing the West Midlands as the inward investment region of choice, supporting inward investment and helping develop business destinations.
- Quality of Life: the facilities, services and natural and historic environments that visitors are looking for also provide local people with more choice and enrich the quality of life of local communities. The aim is to decouple levels of consumption from environmental impact and to provide a tourism and visitor economy that is resilient to climate change.
- Accessibility in its broadest sense is critical to the competitiveness and the environmental impact of the visitor economy. Part of the appeal of the West Midlands as a business and leisure destination is its strategic and central location, including the strategic road network, Birmingham International Airport and Birmingham New Street station as key gateways. At present, the majority of the visitor travel is car-borne. The aim is to promote and develop an integrated transport network and sustainable transport options which aid competitiveness and meet the needs of the visitor travel market and, at the same time, minimise the environmental and climate change impacts of travel.



## Nature of the West Midlands Visitor Economy

As a context for development at local level, it is important that regional policy demonstrates an effective understanding of the nature and scope of activity and the sector's key assets, market strengths and opportunities.

Business and conference tourism is a particular strength, arising from high standards of visitor infrastructure (conference venues, hotels etc.) and the region's central location and high standards of access. The West Midlands is recognised as the pre-eminent business tourism destination in Britain, outside of London. A study of the region's business tourism sector values this part of the visitor economy at approximately £6 billion (KPMG, 2007).

The leisure tourism industry also generates an estimated £6 billion in visitor expenditure and supports 115,000 full time equivalent jobs<sup>4</sup>. The leisure visitor economy is complex, reflecting the diversity of the region. That diversity embraces major visitor attractions, shire and market towns, strong heritage associations and contemporary culture. City-break tourism has been a major growth sector in the UK over the previous decade and retail, culture and night-time economies are being recognised as key elements of the overall product.

Appropriate tourism activity brings clear economic benefits, which should be managed to ensure it supports the landscape, environment and heritage assets which are key elements of the region's overall visitor appeal. Accessibility via a range of transport forms is an integral part of developing tourism opportunities.

The West Midlands is home to a critical mass of high-profile visitor attractions and major heritage assets that draw visitors and their spend into the region, including Alton Towers, Drayton Manor, Warwick Castle, the Shakespeare Properties, Ironbridge Gorge World Heritage Site, Cadbury World, Dudley Zoo and Castle and West Midlands Safari Park. It is important to maintain the day visitor market and grow its value by appealing to the higher-spend day visitor markets, increasing higher spend and extending the visitor day.

The Region has a number of recognised hubs of visitor activity including South Warwickshire, Ironbridge Gorge World Heritage Site and Birmingham City Centre. It is recognised that significant flows of visitors create and sustain vibrant local economies but can also bring increased pressure on environments and on local infrastructure. A sustainable approach to visitor management is required in order to maximise benefits and minimise potential conflicts.

The countryside is a key part of the region's overall visitor appeal and the sector plays a key role in the overall environmental economy. The West Midlands has beautiful countryside, including protected landscapes such as the Malvern Hills, Wye Valley, Cotswolds, Shropshire Hills and Cannock Chase AONBs and part of the Peak District National Park, in addition to a diverse range of high quality landscapes and environments throughout the region. The protection and enhancement of the region's environmental quality and assets will be critical in order to support and secure a tourism offer that is sustainable. Tourism is one of a range of activities which will need to contribute to the overall sustainable management of the countryside and the region's environment.

<sup>4</sup> 2009 economic impact and tourism GVA estimates expected to be available March 2010.

# ➤ Tourism and the Visitor Economy

## Visitor Profile

Approximately 90% of visitors to the West Midlands are on day trips, but the short break market is where the economic growth opportunities lie because overnight visitors deliver higher spend per head with fewer journeys. The market catchment is larger, offering more potential for growth. Day visitors are an important source of income to the tourism businesses of the region but this needs to be balanced by growing the short break market in locations that have accommodation capacity.

In common with most UK destinations outside London, the majority of visitor activity originates from domestic markets. Overseas visitor spending accounts for approximately 5% of overall turnover. Day visits from within the region and surrounding areas account for approximately 90% of overall numbers of visits.

The West Midlands conurbation accounts for the largest proportion of overall visitor expenditure and numbers of trips. However, the sector is proportionately more important in terms of support for employment in rural parts of the region, particularly Herefordshire and Shropshire.

## Challenges

Tourism is a competitive industry. The UK ranks 7th in terms of inbound tourism revenues but overall market share has been decreasing in recent years. All regions and destinations are competing to grow domestic market share. In order to maximise the value of the industry and promote sustainable economic growth, a number of challenges are apparent, including:

- The need for high quality design and development offering good value for money.
- The ability to respond to market demand in a dynamic sector of the economy, harnessing private and public investment.
- The opportunities offered by tourism and the visitor economy in contributing to regeneration.
- A destination based approach to product development. Whole place destination management, integrated transport infrastructure and services, high quality signage, townscape, planning and design of whole places and landscapes, and high environmental standards are all key components which form a positive and enriching visitor experience.

- The need to ensure that development in tourism and the visitor economy is sustainable and contributes to tackling climate change.
- A commitment to developing skills and improved levels of service.

# ➤ Tourism and the Visitor Economy

## Recommended Policy Approach

Tourism and the Visitor Economy within the Regional Strategy should be based on the following policy principles:

1. Regional policy for tourism and the visitor economy should continue to retain a clear focus on promoting sustainable economic growth and regeneration and contributing to the creation of sustainable communities, through attracting additional and higher value tourism activity, whilst protecting and enhancing the environment. In addition to being a source of sustainable economic growth and regeneration, tourism and culture can make a significant contribution to the region's image and reputation.
2. The visitor economy affects most parts of the region. In addition to setting a strategic framework for policy development and sustainable economic growth at sub-regional and local levels, policy at regional level should focus on key assets and destinations.
3. A clear understanding of the key characteristics of the sector, the spatial distribution of key strategic assets and visitor demand/activity patterns and their impact on the environment is required as the basis for regional policy. Policy content at regional level should identify and balance strategic opportunities and constraints for the sector and set a policy direction which clearly recognises the need to

promote sustainable economic growth and regeneration, and key existing strategic assets. These include:

- Key business and conference tourism hubs and venues. The region should continue to seek to capitalise on its world-class business tourism infrastructure and fully exploit its locational advantage and established high profile as a business destination:
- Major visitor attractions.
- Leading cultural venues and museums.
- Visitor destinations which are hubs of activity, including South Warwickshire, Birmingham and the NEC complex.
- Leading sporting venues and events.
- The countryside, canal network and market towns/cathedral cities as hubs of activity.
- Leading heritage assets and environments, including Ironbridge Gorge World Heritage site.

4. There are significant synergies with the region's cultural and sporting infrastructure (see Policy Recommendation on Culture and Sport), in particular, the major (regional, national and internationally recognised) assets which have a distinct appeal. Contemporary culture and the cultural and historic environment heritage of the West Midlands is at the heart of the visitor experience, a key element in attracting visitors to the region and growing

short break opportunities.

5. As an accepted part of the Region's economy, it is recognised that tourism activity often generates travel and development. Tourism development should utilise and encourage sustainable and integrated transport solutions (in line with WMRSS Transport and Accessibility policies), sustainable construction and high quality design (in line with draft WMRSS Policy SR3) and take place in an environmentally sustainable manner (in line with the Quality of the Environment and climate change policies). An increase in visitor activity should seek to minimise negative environmental, transport and other impacts, and contribute to achieving climate change objectives, including by adopting cleaner energy and resource efficient practices. Wherever possible, tourism activity and development should be planned and informed by clear market intelligence. Tourism development is often product-led and frequently depends on a high standard of planning with landscapes, countryside, historic environment and design, forming key elements of the unique place-based character of destinations.

# ↘ Tourism and the Visitor Economy

6. High standards of transport and accessibility, wherever possible by sustainable modes, are of great importance to the visitor economy and the overall development of the region. This includes:

- ↘ Connections to other regions and the wider world through such gateways as Birmingham New Street, Birmingham International Airport, the potential High Speed Railway link to the South East, and the strategic road and rail network.
- ↘ The provision of local infrastructure and services, including tourism and directional signage (eg standard and consistent brown and white signs) to key visitor assets and destinations. A consistent approach to applying signposting schemes across the region should be promoted.
- ↘ Aligning public transport services and tourism flows, including by improving public transport services to and from visitor attractions at peak leisure and visitor times, especially at weekends and evenings.
- ↘ Where major new facilities are planned these need to be located and planned, wherever possible, to promote the use of public transport, walking and cycling and to minimise the need to travel by private car, in line with the WMRSS Transport and Accessibility policies.

7. In addition to encouraging appropriate new development, emphasis should be placed on the sustainable management of assets in the context of their

whole environment experience and impacts, reflecting their importance to regional and local economies and regeneration. Complementary new facilities should be encouraged in line with market demand and other relevant policy considerations. At this time, no specific major new regional tourism development opportunity has been identified. However, tourism policy should enable appropriate major new opportunities to be embraced, in line with other regional policies.

8. Reinforcing the role of tourism and culture in supporting the development of Birmingham as a global city. Developing Birmingham as a premier European city break destination utilising contemporary culture, visitor attractions, the retail product, design and enhancement of the historic environment will further enhance its role as an international leader in the conference and exhibitions sector.
9. The importance of the visitor economy to many rural areas, where activity by its character is more dispersed than in urban areas, but is proportionately more important in terms of business base and employment, should be recognised. Tourism and the visitor economy is a key source of diversification and regeneration for many rural communities.

10. At a local level, tourism can be used as a focus for regeneration and can help sustain the viability and vitality of local services such as shops, cafes, pubs and post offices. This is particularly important for rural areas, where managing and improving local tourist and visitor

assets can also help to manage the potential pressures on the environment and townscapes resulting from visitor activity.

11. A reflection of the importance of the concept of destination experience is required. While key individual assets, including visitor attractions, cultural and heritage-based facilities are key attractors, the principle of high quality planning and design and management of spaces, within the context of an overall destination, is critical to success in the visitor economy.
12. The sector should contribute to place building and the creation of environments which are attractive for businesses, investors and residents, and help to create a sense of place. The visitor economy and visitor demand can create demand for additional cultural, sports and leisure facilities that can help improve the quality of life for people living in the region. Similarly, visitor usage should be planned and promoted in a way which supports the care and management of historic and natural environments.
13. Recognition should be given to the importance of a consumer-led approach to marketing, leading with products and destinations which have resonance with key visitor markets. An attractive marketing policy which leads with key attractors and brand messages provides opportunities to then showcase and raise awareness of the breadth of destinations and tourism assets throughout the region.



# Integrated Approach to the Management of Environmental Resources

## Update of the Environmental Policies in the WMRSS

### Introduction

The policy recommendations in this section update Part 1 of the existing WMRSS Quality of the Environment chapter on environment policies. The integrated approach to the management of environmental resources topic policy recommendation provides for the updating of Policy QE1: Conserving and Enhancing the Environment. The following policy recommendations provide updates for Policies QE2 and QE4-8, and for the text on protection of agricultural land and air quality.

Policy QE3: Creating a High Quality Built Environment for All has been incorporated into the WMRSS Phase Two Revision Sustainable Region policies. Policy QE9: The Water Environment and the paragraphs on development and flood risk are being revised as part of the WMRSS Phase 2 Revision, so are not included in this revision. Policy QE10: Transforming the Environment of the Black Country was included as part of the Phase One Revision issued in January 2008 and will not be revised further during this Revision.

### Policy Objectives

The Revision aims to develop a strategy for the protection, conservation, enhancement and management of regional environmental assets and resources, for their intrinsic value and wider social and economic benefits.

## Key Messages from Options Consultation

The majority of respondents to the WMRSS Phase Three Options consultation (86%) agreed with the concept of an over-arching policy on Integrated Management of Environmental Resources and that the list of issues outlined in the consultation included many of the important elements. Comments from respondents included:

- As the over-arching environmental policy, the “Integrated Approach” Policy should be placed at the beginning of the Quality of the Environment section.
- It was suggested that a vision for the region’s environment in/ beyond 2026 should be included, and a brief description of the value of the environment to the region, its main strengths or assets, and current threats and opportunities.
- Strengthened wording. It was suggested that the policy should indicate that Local Authorities, agencies and others in their Development Plan Documents and other strategies should “embed” rather than “establish” key environmental principles. The overall direction and tone of the policy should be more ambitious. Terms such as “no net loss” and “minimising harm” were outdated and did not meet current planning policy guidance. For example, PPS9 Biodiversity and Geological Conservation stresses the requirement for enhancement; similarly in relation

to draft PPS15 Planning for the Historic Environment.

- Provide links to the WMRSS Phase Two Sustainable Region policies and Spatial Strategy, perhaps through themes of sustainable economy, sustainable communities and climate change.
- Strong reference should be made to the landscape as an integrating spatial framework, and to note the role of nationally protected landscapes in delivering public benefits.
- Include key environmental principles, such as ecosystems services and green infrastructure planning.
- Adding examples of delivery mechanisms as well as highlighting their importance would aid understanding; add issues of building and environmental design quality; international / global environmental goals.
- The concept of an overarching policy on integrated strategy was considered a good idea; however this must include greater links with the economic and social aims to be fully sustainable and integrated.
- Evidence from Natural England’s State of the Environment Report 2008 indicated that the natural environment was much less rich than 50 years ago and under pressure from a range of threats.





# Integrated Approach to the Management of Environmental Resources

## Supporting Text

Securing the Future: the UK sustainable development strategy 2005 recognises the need to live within our environmental limits and identifies the protection of essential natural resources, environmental enhancement, climate change and energy as priorities for action. The United Nations Millennium Ecosystems Assessment investigated the consequences of ecosystem change for human well-being and recognised the integration between environmental resources.

World Class Places: the Government's strategy for improving quality of place 2009 aims to improve design and upkeep of buildings and places, to provide for green space and green infrastructure, and to improve the treatment of historic buildings and places.

Recent national Planning Policy Statements have highlighted the importance of sustainable development, global sustainability, the causes and impacts of climate change, efficient use of land, high quality design, developing resilient landscapes, and conserving and enhancing biodiversity, geodiversity and the historic environment.

The Regional Sustainable Development Framework, A Sustainable Future for the West Midlands 2006 highlights the quality of the region's urban environments as a key issue and valuing the environment and living within environmental limits as key principles. Recognition of the importance of environmental limits has led to the development of concepts such as environmental

capacity, environmental capital and the ecosystems approach. These concepts are developing and are relevant to the WMRSS Phase Three Revision process. The Government's approach is set out in Securing a Healthy Natural Environment 2007, an action plan which aims to embed the ecosystem approach in regional policy and delivery.

A key issue is the importance of conserving and enhancing the quality of the Region's environment, especially its major urban areas, to the delivery of the WMRSS priorities of urban and rural renaissance. This is reflected in the spatial strategy objective to make the major urban areas increasingly attractive places where people want to live, work and invest, and in Policy QE10 on transforming the environment of the Black Country in the Phase One Revision issued in January 2008.

Evidence of the state of the environment suggests that many assets are declining, or that any improvements are too small to make a significant difference within WMRSS time scales. Some assets perform vital functions for life to exist, such as air and water quality, which can be affected by over exploitation or pollution. Others may be irreplaceable if lost, such as soil, ancient woodland and the historic environment.

Environmental limits or thresholds will vary according to a range of factors, so it is often difficult to set levels that should not be exceeded. New development will create demands for water and sewage treatment for example, which may require new infrastructure and improved efficiency levels, or threaten water quality and biodiversity standards

set by European Directive or Government regulations.

Climate change will have significant impacts on environmental assets, with natural habitats and species threatened by changes in temperature and rainfall. There is potential to deliver wider benefits through green infrastructure for urban cooling, linkages for wildlife and as a source of renewable energy.

The growth agenda will lead to greater pressures on environmental assets and vital services. It increases the importance of development conserving and enhancing the environment, as well as meeting socio-economic needs, including green space and recreation. Promoting positive enhancement and environmental gain in all development will help to ensure that the environment is conserved and enhanced.

The WMRSS aims to reflect the interrelationships between environmental assets by ensuring that all assets are conserved and enhanced together, rather than individually. This approach responds to the new emphasis on ecosystems, landscape scale planning, place making and green infrastructure planning. It should provide greater benefits by avoiding changes that may have adverse impacts, and will address climate change impacts, such as increasing intensity of weather patterns, urban heating and displacement of species.

Further work is being undertaken in the region on prioritising environmental issues for the new Strategy for the West Midlands.



# Integrated Approach to the Management of Environmental Resources

## Recommended Policy Approach

The new overarching environmental policy should articulate:

- a) A vision or reference to a vision for the region's environment for positive enhancement and environmental gain, drawing on the ecosystems approach, quality of place and other initiatives, developing the environmental elements from the WMRSS Sustainable Region policies and setting the context for more specific environmental policies, where relevant.
- b) A regional dimension to key global/international goals/themes, such as climate change mitigation and adaptation, loss of biodiversity and the integrity of European sites, enhancement of degraded or damaged areas and environmental justice. Emphasis will be required on the intrinsic importance of environmental assets and the services that the environment provides, such as flood prevention/alleviation and local climate regulation.

c) The contribution that the environment can make towards the creation of sustainable communities, including opportunities to enhance place making, health and well-being, and local distinctiveness, in the context of the growth and regeneration agenda.

d) The importance of protecting and enhancing the quality of the environment for urban and rural renaissance, for the image and attractiveness of the region as a place to live, work and invest, and to deliver a low carbon economy.

e) Key integrating themes which will be promoted to ensure multi-functional benefits, and within which more detailed environmental policy can be provided:

- To conserve and enhance the historic environment and deliver quality in the built environment;
- To protect and enhance green infrastructure and establish and promote a landscape scale approach; and
- To conserve and enhance natural resources and minimise the consumption of resources;

f) The key delivery mechanisms for environmental enhancement.





# Update of Policy QE2 - Restoring Degraded Areas and Managing and Creating High Quality New Environments

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other WMRSS Phase Three topics such as culture, sport and tourism.

## Key Messages from Options Consultation

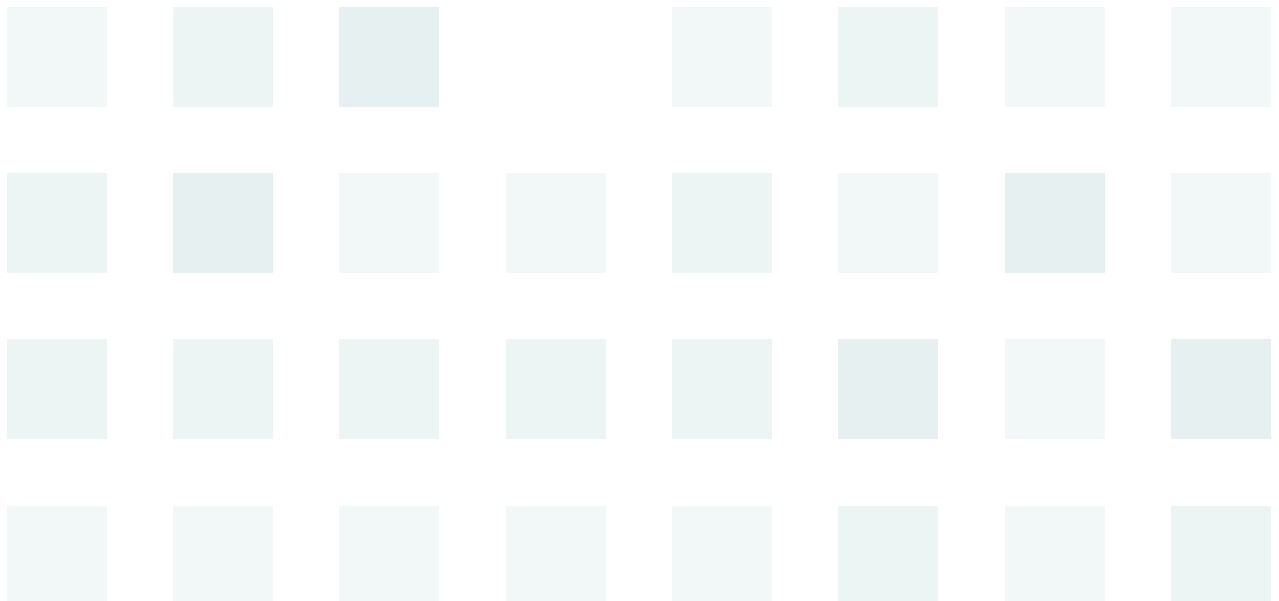
80% of those responding to the consultation supported the list of suggested issues for Policy QE2. A number of views were given on particular issues which should not be included, in particular (d) on the West Midlands Brownfield Land Working Group and (f) on the Regional Centre of Excellence. A range of suggestions were given for additional issues to include, with a number of themes emerging:

- Include importance for geodiversity.
- Address the issue of development viability.
- Move towards a criteria-based approach to the reuse of brownfield sites.
- Recognise positive benefits for mining/quarrying legacy.
- Encourage planning for green infrastructure.
- Emphasise multi-functional benefits.

## Supporting Text

A key issue is the importance of reclaiming and restoring brownfield land, especially in the Region's major urban areas, to the delivery of the WMRSS priorities of urban and rural renaissance. This is reflected in the spatial strategy objective to make the major urban areas increasingly attractive places where people want to live, work and invest, and in the new Policy QE10 on transforming the environment of the Black Country in the Phase One Revision issued in January 2008.

Brownfield and derelict land detracts from the quality of the region's environment, especially its major urban areas, making it more difficult to attract people and economic investment to these areas. Such land provides opportunities to enhance the quality of the environment and meet social and economic needs especially in the major urban areas, but there are concerns that developers will target easier to develop green field sites in preference to brownfield and derelict land in urban areas undermining regeneration.





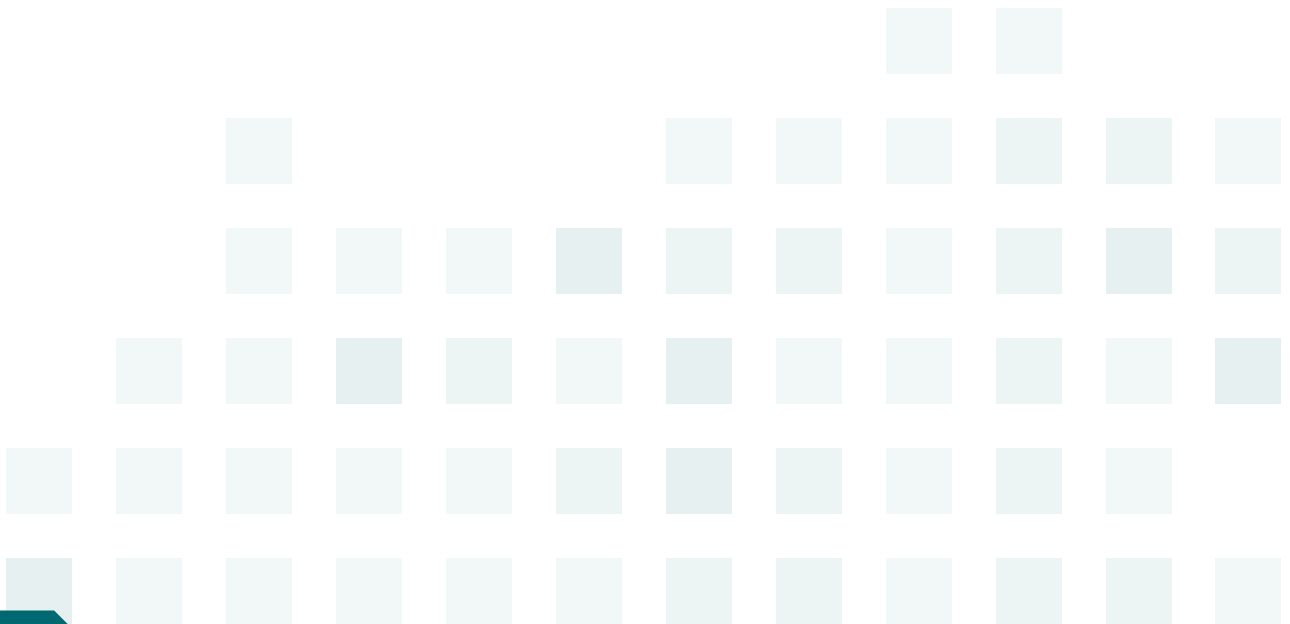
# Update of Policy QE2 - Restoring Degraded Areas and Managing and Creating High Quality New Environments

The West Midlands Economic Strategy identifies the challenge to the region of the forecast growth in brownfield and derelict land. Advantage West Midlands and the West Midlands Regional Assembly have been working with regional stakeholders to enable brownfield land to be brought forward for development in line with housing and business policies. This has led to the development of the regional Centre of Excellence for Land Reclamation as a source of information and expertise about brownfield land.

## Recommended Policy Approach

It is suggested that a revised policy and text for Policy QE2 could:

- a) Recognise the key role that brownfield land can play in the transformation/regeneration of the region, especially its major urban areas.
- b) Ensure that the wider social and environmental benefits of brownfield land, such as brownfield land habitats, and the multiple benefits of green infrastructure, including recreation, flood risk management, biodiversity and geodiversity, and the promotion of good health, are recognised and nurtured, and delivered as an integral part of any new development.
- c) Recognise the particular circumstances of large brownfield sites in rural locations and the potential to contribute to wider sustainability objectives.
- d) Recognise the benefits of the reuse and repair of existing buildings, particularly those of historic interest, and the potential for surviving archaeological interest.
- e) Encourage the preparation of Brownfield Land Action Plans/ previously developed land strategies in areas with significant problems of brownfield land.





# Update of Policy QE4 - Green Infrastructure (formerly Greenery, Urban Greenspace and Public Spaces)

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other WMRSS Phase Three topics such as culture, sport and tourism. Further to wider policy changes at a national and regional level, it was suggested that Policy QE4 should be developed as a new Green Infrastructure Policy.

## Key Messages from Options Consultation

84% of respondents to the Options consultation supported the issues listed for policy QE4. However, a number of respondents felt that the requirement for local authorities to produce Green Infrastructure Strategies was too onerous.

Common themes suggested for inclusion in a revised policy included: allotments and gardens, sports and recreation fields, sustainable transport, cycleways, the footpath network and waterways; rural areas; geodiversity; green infrastructure networks.

It was also felt that there is a need to include the protection and management of existing greenspace, highlight the importance of rights of way networks and make the links to open space strategies.

## Supporting Text

A consistent definition of Green Infrastructure should be used across the range of WMRSS and other regional policy documents. The West Midlands Green Infrastructure Prospectus 2006 sets out a 20 year vision for a greener, healthier West Midlands that recognises the importance of our environment and the many services and benefits it provides. The prospectus defines Green Infrastructure as:

*‘the network of green spaces and natural elements that intersperse and connect our cities, towns and villages. It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside. Green infrastructure provides multiple benefits for the economy, the environment and people.’*

The WMRSS Phase Two Revision Implementation Plan Supplement (March 2009) stressed that Green Infrastructure provides a wide range of economic, social and environmental benefits:

*‘Green infrastructure should be designed and managed as a multi-functional resource that provides a range of environmental services and quality of life benefits such as –*

- *The high quality of environment that encourages economic investment and attracts people to live in an area.*
- *Scope for specific business opportunities such as renewable energy generation – biomass growing and use, for example.*
- *Opportunities for informal recreation and contact with nature that can improve physical health and mental wellbeing.*
- *A setting for social interaction and community activities.*
- *Mitigation and adaptation to a changing climate and the means to address specific issues such as flood alleviation.*
- *Healthy and diverse wildlife and ecosystems.*





# Update of Policy QE4 - Green Infrastructure (formerly Greenery, Urban Greenspace and Public Spaces)

*Consequently, it is essential that green infrastructure is planned, delivered and managed in a co-ordinated and consistent manner across the region, with an appropriate level of investment. It should be planned within new communities, and provided alongside other infrastructure, from the outset.*

*There will be a need for significant investment in green infrastructure in certain locations to address environmental issues and meet the demand for informal recreation.'*

There has been some progress in planning for green infrastructure, especially in some Growth Points, but these principles need to be adopted more widely. There needs to be a strong link between Green Infrastructure Strategies and PPG17 Assessments. It is recommended that PPG17 Assessments form part of Green Infrastructure Strategies.

## Recommended Policy Approach

The policy on Green Infrastructure should be based upon:

a) Placing a greater emphasis on Green Infrastructure, advocating an integrated, multi-functional and consistent approach across the region, as defined by green infrastructure planning.

b) Using the West Midlands Green Infrastructure Prospectus definition as a foundation with supporting text including historic environment/character/local distinctiveness.

c) Placing emphasis on the wider sustainability benefits that Green Infrastructure can deliver in all parts of the region, but especially in areas of deprivation. These benefits include mitigation and adaptation to climate change, minimising flood risk, improving the image and attractiveness of an area, potential contribution to renewable energy/biomass, health and well-being, opportunities for recreation/play, mitigating the adverse effects of growth policies, enhancing the supporting functions of the land around European sites and the conservation and enhancement of biodiversity and woodlands. The growth agenda and new developments will present important opportunities for securing the benefits that Green Infrastructure provides.

d) Referring to recreational resources including access and emphasising the importance of PPG17 assessments being seen as part of wider Green Infrastructure Strategies rather than stand-alone documents.

e) Encouraging/requiring local authorities to produce Green Infrastructure Strategies, especially in growth areas and regeneration areas.

f) Ensuring a strong link to the overarching policy envisaged in the integrated approach to the management of environmental resources topic, recognising the importance of Green Infrastructure as part of Ecosystems Services delivery.

g) Recognising the need to map the existing green infrastructure resource in a holistic and integrated way to make sure all aspects of green infrastructure uses, functions and opportunities are taken into account, and identifying priorities for green infrastructure provision, taking into account related work on regional natural environment priorities and other initiatives.





# Update of Policy QE5 - Protection and Enhancement of the Historic Environment

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other WMRSS Phase Three topics such as culture, sport and tourism.

## Key Messages from Options Consultation

There was a high degree of support in the Options consultation (88%) for the Policy QE5 issues, including understanding the importance of the historic environment, protection and enhancement, recognising wider benefits, and prioritising areas subject to greatest change. A range of comments were made for either exclusions or additions, although there were no particular themes emerging from the comments.

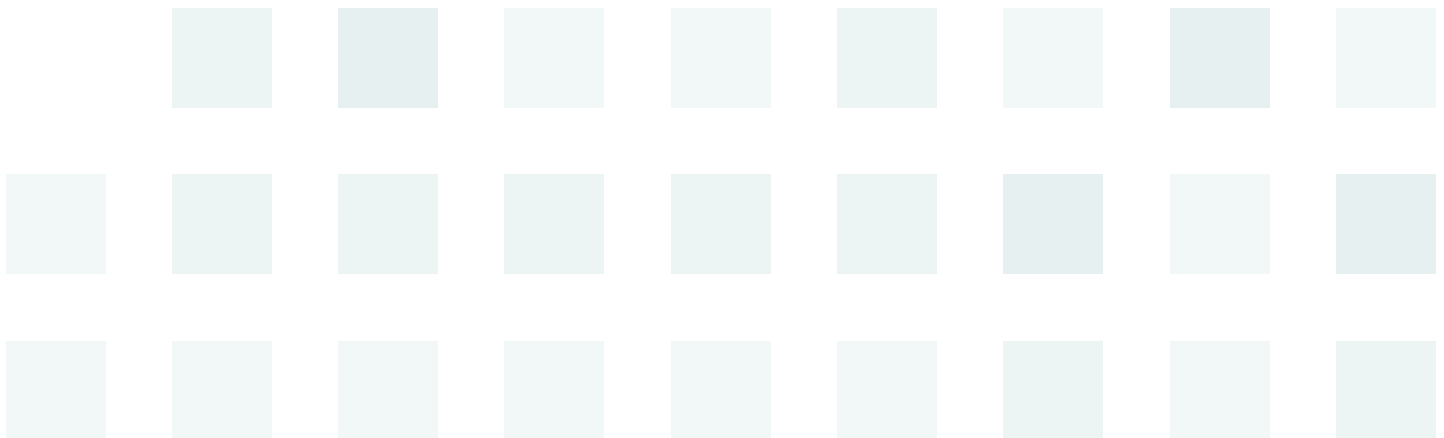
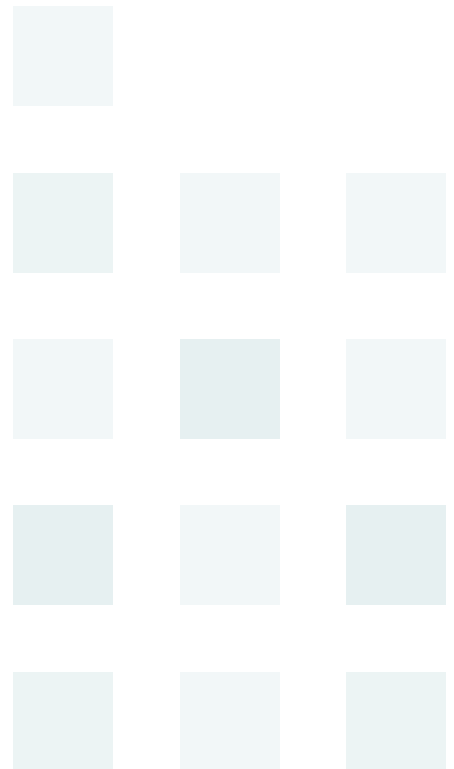
## Supporting Text

The White Paper on Heritage Protection emphasises the importance of the historic environment within planning and in building sustainable communities. The draft PPS15 brings together all aspects of the historic environment

(built environment, archaeology, landscape) and affirms the Government's broad aim that the historic environment and heritage assets, in particular, should be conserved, enhanced and enjoyed aligning this with the principles of sustainable development. It requires that regional strategies should be informed by the character and significance of the historic environment in the region, with particular attention to landscapes, groupings or types of heritage assets that give the region and places a distinctive identity.

The West Midlands Historic Environment Strategy, 'Putting the Historic Environment to Work' (2009), sets out a vision for the historic environment in the region under the three interrelated themes of people, places and policies. It identifies nine priorities to deliver the vision including: broadening understanding of the region's historic environment and how it can contribute to the sense of place and distinctiveness of the West Midlands; ensuring that the historic character and assets of places across the region are conserved and enhanced; and demonstrating how the region's historic environment can positively contribute to sustainable development, climate change, the economy and quality of life.

Valued historic buildings, archaeological remains and historic landscapes across the West Midlands continue to be at risk through neglect, decay, loss of use, and development pressures. The Heritage at Risk Register (2009) shows that the West Midlands is above the national average for listed buildings (Grade I & II), scheduled monuments, and registered parks and gardens at risk. The historic environment offers positive opportunities for growth and regeneration, leisure and tourism, and education and social cohesion, and is also vital to the valued and distinctive character and identity of the West Midlands. However, there is the potential that this irreplaceable resource may come under further pressure, particularly in areas identified for significant housing growth or comprehensive regeneration.





# Update of Policy QE5 - Protection and Enhancement of the Historic Environment

## Recommended Policy Approach

It is suggested that a revised policy and text for Policy QE5 should:

(a) Reflect and take forward the principles of the Heritage White Paper, Heritage Protection Bill and the draft PPS15, such as the finite and irreplaceable nature of the historic environment, the importance of the undesignated resource and of consulting communities to determine what they value and why, and managing change in ways which are informed by an understanding of the significance of the historic environment and local character and distinctiveness.

(b) Take forward the Regional Historic Environment Strategy by recognising and promoting the positive social, economic and environmental benefits of the historic environment to the region's character, local distinctiveness and sense of place, to leisure, educational and cultural activities, to the economy (e.g. heritage-led regeneration, heritage skills, quality of place and attracting inward investment, building repair and reuse, tourism) and to sustainability (e.g. reuse of buildings/resource efficiency).

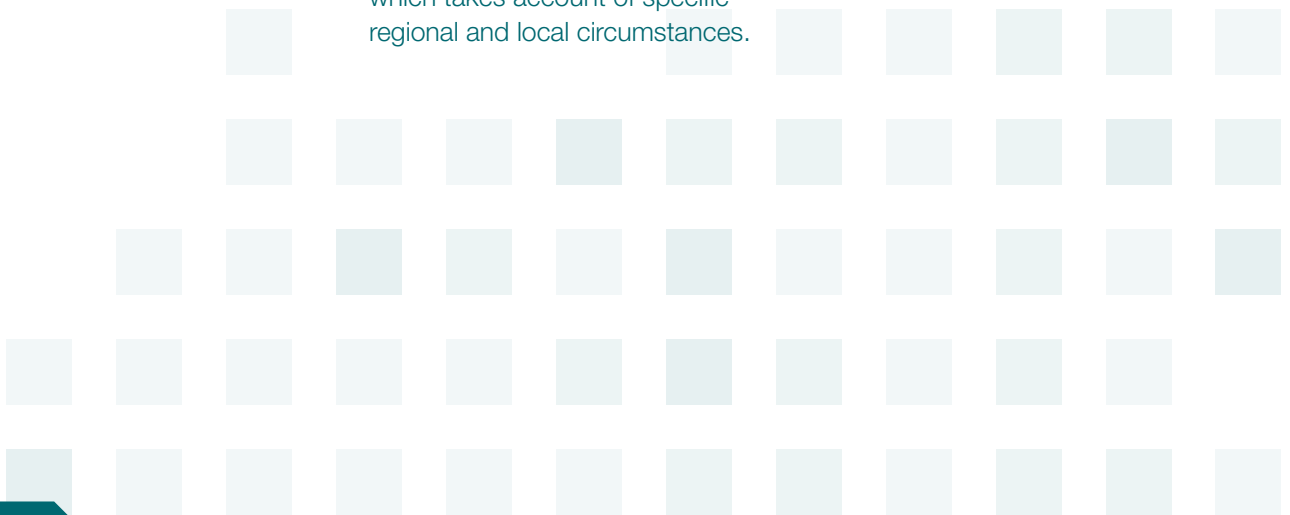
(c) Review the lists of regionally distinctive aspects of the Region's historic environment, and the opportunities and priorities for enhancement and regeneration, including heritage at risk, in the context of the region's urban and rural renaissance.

(d) Provide guidance on the conservation and enhancement of the historic environment in areas of the region likely to experience the greatest change, such as the Major Urban Areas, Settlements of Significant Development, and other areas where growth and regeneration are likely to be concentrated.

(e) Retain an emphasis on the consideration of historic landscapes and townscapes as a whole, and encourage local authorities to build on the region's expanding coverage and resource of historic landscape and urban characterisation initiatives, and other data, through their use in understanding the historic character of places, their significance and their sensitivity to and capacity for change.

(f) Include suitable guidance on the protection, sustainable use, including enhancement where appropriate of the region's two World Heritage Sites, Ironbridge Gorge and part of the Pontcysyllte Aqueduct, which takes account of specific regional and local circumstances.

(g) Establish a strong link to the overarching policy envisaged in the integrated approach to the management of environmental resources topic, with the historic environment recognised as an environmental asset integral to the region's sustainability, quality of place and economic prosperity.





# Update of Policy QE6 - Conservation, Enhancement and Restoration of the Region's Landscape

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other WMRSS Phase Three topics such as culture, sport and tourism.

## Key Messages from Options Consultation

85% of respondents to the Options consultation supported the suggestions set out in the consultation for a revised policy and text of policy QE6.

It was felt that landscape encompassed biodiversity and the historic environment, and therefore needed to be seen as a more overarching concept.

The policy should also encourage local decision makers to allow for positive landscape change.

Landscape Character Assessment was still seen as very important and it was essential that part of the old policy, relating to the importance of the use of Landscape Character Assessment by Local Authorities in developing their plans, policies and proposals, is retained.

Good practice should be drawn from the South East and South West Regional Spatial Strategies to strengthen the Protected Landscape element of the policy.

## Supporting Text

The European Landscape Convention sets out the National and European context for the protection, management and planning of the Region's landscapes and emphasises the importance of all landscapes, not just protected areas. The European Landscape Convention came into effect in the UK from 1 March 2007.

The definition of landscape in the European Landscape Convention is:

*'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'.*

Landscapes deliver a wide range of ecosystem services, with benefits for biodiversity, maintaining and improving air, water and soil quality, reducing flood risk, mitigating temperature rise and supporting biodiversity migration. A wider 'landscape approach' should be integrated into the multi-functional, sustainable planning and management of the whole natural environment.

Protected landscapes – National Parks and Areas of Outstanding Natural Beauty (AONBs) - can be seen as exemplars for this integrated approach. There are five AONBs wholly or partly within the region – Cannock Chase, Cotswolds, Malvern Hills, Shropshire Hills, and the Wye Valley. Their 'AONB Management Plans' provide a framework that sets out local priorities for landscape, geodiversity, biodiversity, the historic environment and access and recreation.

Landscape Character Assessment is widely acknowledged as the established methodology for understanding the character of the region's landscapes and should continue to be used, in conjunction with Historic Landscape Characterisation, as a consistent way to manage the region's landscapes in a well planned way.

Currently, National Character Area (NCA) Descriptions, formally known as Joint Character Areas, are being updated and interim objectives are being set for each Character Area in the West Midlands. Countryside Quality Counts and its successor - the Condition and Quality of England's Landscapes - use England's National Character Areas (NCAs) as the geographical framework for reporting and assessing the direction of landscape change for each NCA using four categories: maintained, enhancing, neglected, and diverging. Currently 10 out of 25 of the region's NCA's are assessed as 'neglected' or 'diverging' (changing in a way inconsistent with character).

A Regional Landscape Partnership has been established and is developing a Landscape Advocacy Document based upon a Regional Landscape Framework. This will be very relevant to the future development of regional landscape policy.



# Update of Policy QE6 - Conservation, Enhancement and Restoration of the Region's Landscape

## Recommended Policy Approach

The policy on the Region's landscape should be based upon:

(a) Recognising the European Landscape Convention as the National and European context for protecting, managing and planning the region's landscapes; and encouraging local authorities to prepare action plans for the implementation of the Convention.

(b) Emphasising the importance of managing all landscapes positively – explaining the shift to 'All Landscapes Matter'.

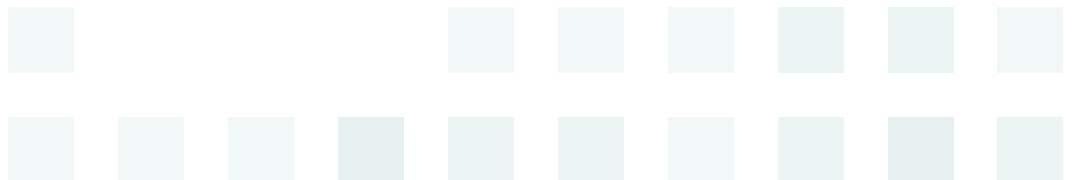
(c) Including the protected landscapes element of the existing Policy QE1 and encouraging local planning authorities and other relevant authorities to have regard to AONB Management Plans and use them as exemplars for an integrated approach to landscape management.

(d) Retaining the use of Landscape Character Assessment including Historic Landscape Characterisation and integrated assessments.

(e) Updating WMRSS Figure 4: Natural and Character Areas in the West Midlands with a new map identifying the National Character Areas and their condition using Countryside Quality Counts / Condition and Quality of England's Landscapes as a monitoring mechanism.

(f) Ensuring a strong link to the overarching policy envisaged in the integrated approach to the management of environmental resources topic and including references to geodiversity (sits mainly within biodiversity policy QE7), townscape, maintaining and strengthening local distinctiveness, tranquillity, noise and light pollution.

(g) Identifying priorities for landscape restoration and enhancement, based on National Character Area Objectives, the monitoring results from Countryside Quality Counts / Condition and Quality of England's Landscapes, AONB Management Plan Objectives, and taking into account related work on identifying regional natural environment priorities and other initiatives. Particular focus should be given to areas of deprivation and subject to the greatest pressures from growth and urban populations.







# Update of Policy QE7 - Protecting, Managing and Enhancing the Region's Biodiversity and Geodiversity

(formerly Biodiversity and Nature Conservation Resources)

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other WMRSS Phase Three topics such as culture, sport and tourism.

## Key Messages from Options Consultation

Two thirds of respondents to the Options consultation agreed with the proposed targets for the protection, restoration and re-creation of habitats to update WMRSS Annex B, with the principle of the inclusion of targets broadly supported by a number of key stakeholders including Natural England, the West Midlands Biodiversity Partnership and the Woodland Trust.

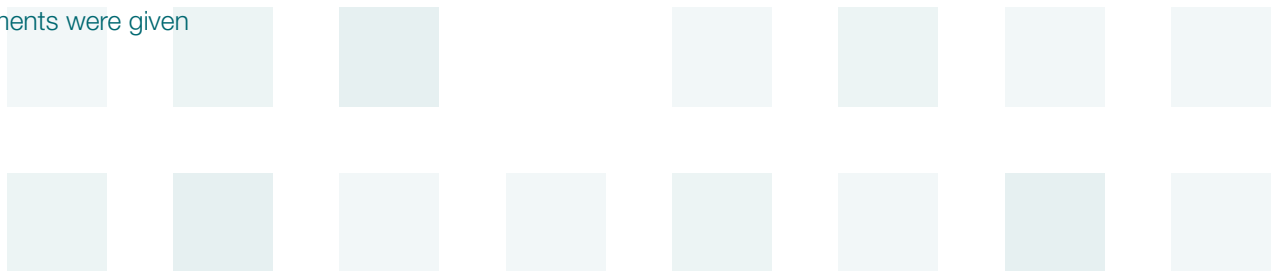
In the case where respondents disagreed with the proposed targets, common reasons were that the targets were not yet fully agreed or that they were too ambitious. Detailed comments were given

on individual targets, and it was also observed by some that the majority of Biodiversity Action Plans management activity falls outside of the scope of the planning system and it was unclear what the WMRSS hoped to achieve by inclusion.

## Supporting Text

The European Convention on Biological Diversity and the England Biodiversity Strategy encourage conservation and enhancement of biodiversity. All public bodies now have a duty to conserve biodiversity. Landscapes for Living takes a landscape scale approach to restoring and enhancing biodiversity. The Regional Biodiversity Strategy identifies the challenges presented by declining species, changing land uses and the impact of climate change.

Geodiversity is a fundamental component of landscape and the natural and built environments and offers regeneration, leisure and tourism and educational opportunities.





# Update of Policy QE7 - Protecting, Managing and Enhancing the Region’s Biodiversity and Geodiversity

(formerly Biodiversity and Nature Conservation Resources)

## Recommended Policy Approach

It is suggested that a revised Policy QE7 should be re-titled “Protecting, Managing and Enhancing the Region’s Biodiversity and Geodiversity”, and could:

- (a) Refer to the need to support resilient natural systems across the region, through the delivery of regional habitat targets at a landscape scale and linking fragmented habitats.
- (b) Recognise the need to ensure that biodiversity assets can adapt to expected future climate change.
- (c) Deliver an agreed set of regional habitat targets ( See Annex B) by maintaining, achieving condition, restoring and expanding habitats, linked to the Regional Opportunities map.
- (d) Require local authorities to support and develop local opportunity maps and take account of them in the preparation of Local Development Frameworks and Green Infrastructure Strategies.

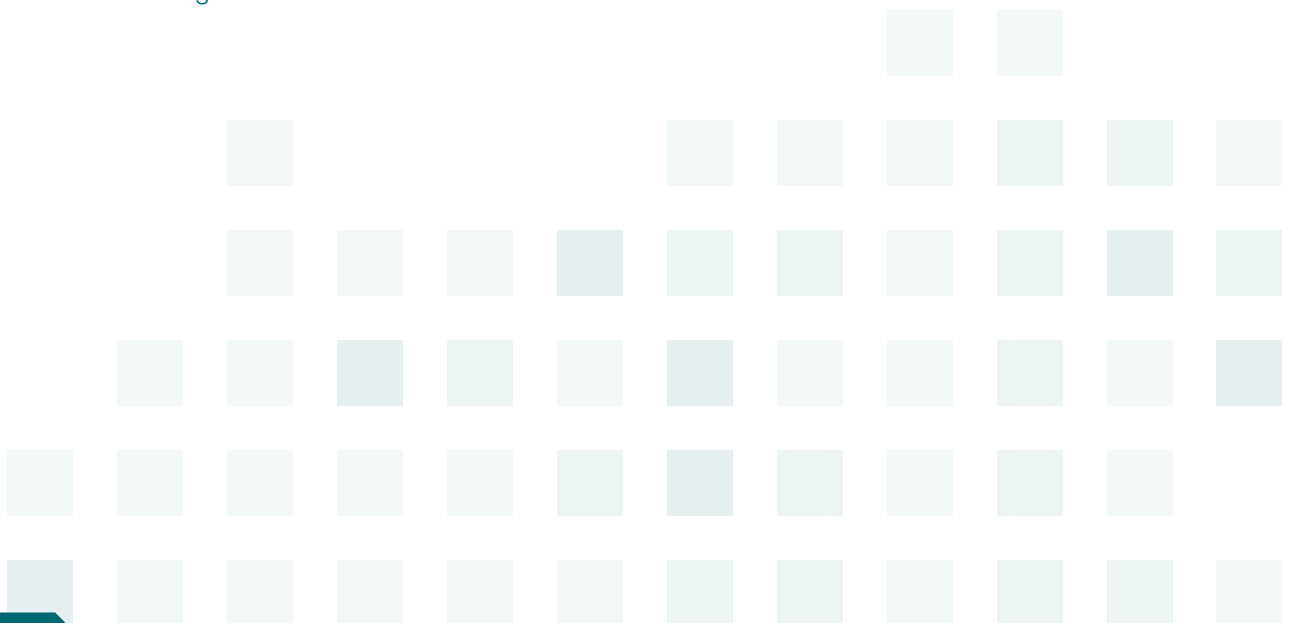
(e) Emphasise the wider social, economic and environmental benefits of biodiversity across the region, such as improving environmental quality, creating and retaining recreational, landscape and tourism assets, providing opportunities for physical activity, improving the image and attractiveness of areas, managing flood risk, mitigating the adverse effects of growth policies and enhancing the supporting functions of land around European sites.

(f) Ensure that benefits for biodiversity are captured from the housing and other growth proposals for the region, and promote its contribution to urban quality and greenspace.

(g) Raise awareness of the statutory duty on all public bodies to ensure wider benefits for the natural environment including the management of Local Sites for biodiversity and geodiversity.

(h) Recognise the potential for biodiversity enhancement associated with mineral extraction.

(i) Incorporate Geodiversity.





# Update of Policy QE7 - Protecting, Managing and Enhancing the Region's Biodiversity and Geodiversity

## Annex B Targets for the protection, restoration and recreation of habitats.

Habitat (all figures in hectares unless otherwise stated)	Maintain Extent	Achieve Condition (all figures in %)	Restoration	Expansion
Arable Field Margins <sup>13</sup>	4425 <sup>13</sup>	100	0	1921
Blanket Bog	1504 <sup>1</sup>	95	30	0 <sup>2</sup>
Coastal and Floodplain Grazing Marsh	7342	85	2566	319
Eutrophic Standing Waters (sites)	500	100 <sup>16</sup>	4	9
Fens <sup>14</sup>	250	100	120	0
Hedgerows (km)	unknown, NNL	75	157	318
Inland Rock Outcrop and Scree Habitats <sup>12</sup>	unknown	n/a	0	0
Lowland Calcareous Grassland	879	85	128	457
Lowland Dry Acid Grassland	956	85	198	130
Lowland Heathland	1630	95	0	507
Lowland Meadows	2926	85	1500	646
Lowland Raised Bog	653	100	98	0
Mesotrophic Lakes (sites)	20	100 <sup>16</sup>	4	0 <sup>3</sup>
Native Woodland <sup>4</sup>	44186	70	11774 <sup>5</sup>	11691
Oligotrophic and Dystrophic Lakes (sites)	3	100 <sup>16</sup>	0	0 <sup>6</sup>
Open Mosaic Habitats on Previously Developed Land	455, NNL	N/A	50	0 <sup>7</sup>
Ponds (sites)	unknown, NNL	N/A	566	536
Purple Moor Grass and Rush Pastures	356	90	76	61
Reedbeds	154	90	0	235 <sup>8</sup>
Rivers (km)	12500	100 <sup>16</sup>	200	0 <sup>9</sup>
Traditional Orchards	8224	75	502	741
Upland Calcareous Grassland	5	100	2	0
Upland Heathland	5146	100	181	20 <sup>10</sup>
Wood-Pasture & Parkland (sites) <sup>15</sup>	unknown	75	80	40
Canals <sup>11</sup> (kms)	1585	80	n/a	n/a



# Update of Policy QE7 - Protecting, Managing and Enhancing the Region’s Biodiversity and Geodiversity

## Notes

n/a – data not available, NNL - No Net Loss.

1. Lowland Raised Bog Maintain Extent Target - figure based on poor quality data; requires further research.
2. Lowland Raised Bog Expansion – the national guidance gives a zero figure for expansion.
3. Mesotrophic Lakes - the national guidance gives a zero figure for expansion.
4. Native Woodland. All 5 native woodland HAPs (Lowland Beech and Yew Woodland, Lowland Mixed Deciduous Woodland, Upland Mixed Ashwoods, Upland Oakwood, Wet Woodland) have been combined into one set of generic native woodland targets. This reflects the fact that on the ground there is a dynamic continuum between woodland types. However, this will not dilute the emphasis placed on nativeness and on achieving the right type of woodland for each individual site.
5. The Native Woodland restoration target refers exclusively to Plantations on Ancient Woodland Sites (“PAWS”).
6. Oligotrophic and Dystrophic Lakes - the national guidance gives a zero figure for expansion.
7. Open Mosaic Habitats Expansion is shown as zero, although new sites will be created through the No Net Loss Maintain Extent target.
8. Reedbeds Size - Only sites over 2ha will count towards this target and preferably sites will be equal to or greater than 20ha.
9. Rivers Expansion is shown as zero, although in practice there will be a few opportunities for new near-natural river course establishment.
10. The geographical opportunity for Upland heathland restoration is believed to be limited and this figure may need to be reviewed after further research.
11. Canals – regionally important and locally distinctive habitat, extent figure brought forward from previous WMRSS.
12. Inland Rock Outcrop and Scree Habitats – new habitat requiring audit and development of targets
13. Arable Field Margins – draft figures derived from Natural England awaiting update.
14. Fens – further audit work underway and extent figure may change.
15. Woodpasture and Parkland – further audit work required to determine the number of sites, the targets are based on national guidance regional figure calculated on the assumption of the target relating to the 5 rural counties spread across the whole region.
16. Achieve condition target for water habitats in line with the Water Framework Directive targets for achieving good ecological status.





# Update of Policy QE8 - Trees, Woods and Forestry (formerly Forestry and Woodlands)

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other WMRSS Phase Three topics such as culture, sport and tourism.

## Key Messages from Options Consultation

There was a high degree of support for the Policy QE8 issues for the protection, enhancement, management and creation of trees, woodlands and forestry. A range of comments were made for either exclusions or additions to the issues outlined in the consultation document, with common themes being:

- Policy QE7 and QE8 should be complementary. Account should be taken of biodiversity targets for other habitats as well as woodland to avoid conflict.
- Stronger reference should be made to woodland creation being linked to a landscape character approach.
- There should be cross-referencing between policies on Trees, Forestry and Woodland with Agricultural Land.

## Supporting Text

Trees and woodlands and in particular ancient and native woodlands and veteran trees, are a fundamental component of the Region's countryside and greenspaces. They make significant contributions to quality of life and well being both in rural and urban areas, providing multiple social, environmental and economic benefits, including significant contributions to climate change mitigation and abatement.

The Strategy for England's Trees, Woods and Forests and the West Midlands Regional Forestry Framework, together with associated guidance, provide the regional and national policy context and guidance for developing the region's tree cover and maximising public benefits.

## Recommended Policy Approach

It is suggested that a revised policy and text for Policy QE8 could:

- (a) Ensure that the place and importance of the Regional Forestry Framework is recognised and both links with and adds value to other strategies and policy areas.
- (b) Recognise the significant contribution that the region's trees and woodlands can make to mitigation and adaptation to climate change, helping to meet the Government's low carbon agenda and contributing to water quality and flood management issues.

(c) Encourage delivery of the multiple benefits to be gained from a significant increase in woodland cover through carefully targeted woodland creation, utilising opportunity mapping guidance.

(d) Reflect the major contribution that trees and woodlands make to green infrastructure, seeking to achieve a greater emphasis on this in line with the recommendations for Policy QE4.

(e) Seek to take forward the major contributions trees and woodlands can provide for delivery of related work on identifying regional natural environment priorities and other initiatives, including ecosystem services delivery at a landscape scale.

(f) Protect and restore the region's veteran trees and ancient woodlands in line with Keepers in Time policy and UK Biodiversity Action Plans habitat targets.

(g) Strengthen the priority given to trees and woodland as an important component of urban greenspace in the West Midlands conurbation and other urban areas, also seeking to ensure that new development and regeneration fully encompasses the range of benefits they can provide, including for health and well-being.

(h) Further develop the evidence base and encourage recognition of the benefits to the regional economy from trees and woodland, including the sustainable harvesting and utilisation of wood and timber for a range of markets.





# Update of Protection of Agricultural Land (Paragraphs 8.38 and 8.39 of existing WMRSS)

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other WMRSS Phase Three topics such as culture, sport and tourism.

## Key Messages from Options Consultation

There was a high degree of support for the protection of agricultural land issues, including the importance of the quality of land, the wider sustainability benefits of agricultural land and the potential to encourage local sourcing of food and energy crops. There were few comments, some calling for a policy and some highlighting the relevance of economic issues to agriculture which did not sit well in the Quality of Environment section.

## Supporting Text

PPS7 advises that best and most versatile agricultural land (grades 1, 2 and 3a in the Agricultural Land Classification) should be taken into account, alongside other sustainability considerations, when considering development. Little weight is given to poorer quality

agricultural land, unless it makes a special contribution to the quality and character of the environment or the local economy. Protection of specific areas of agricultural land is a matter for LDFs.

There may be links to WMRSS Policies PA14: Economic Development and the Rural Economy, and PA15: Agriculture and Farm Diversification although these policies are not the subject of the WMRSS Phase Three Revision.

## Recommended Policy Approach

It is suggested that revised text for Agricultural Land in paragraphs 8.38 and 8.39 of the existing WMRSS could address the following issues:

- (a) The importance of the quality of agricultural land and soils, and food production and food security regionally.
- (b) The need to protect the best quality agricultural land, particularly in areas of significant growth or of valued landscapes.
- (c) The wider sustainability benefits to which agricultural land can contribute, including underpinning of the rural economy, tourism and leisure, access to open space, maintaining landscapes and adaptation to the impacts of climate change.

(d) The potential for diversification of agricultural land to contribute to flood risk management.

(e) The potential to encourage local sourcing of food and energy crops.

(f) The potential for encouraging the management of agricultural land for biodiversity and enhancing the supporting functions of land around European sites.

(g) Any variations in the agricultural importance across the region.



# Update of Air Quality (Paragraphs 8.45 and 8.46 of existing WMRSS)

## Policy Objectives

The purpose of the Revision is to update and align the existing Quality of the Environment policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other Phase Three topics such as culture, sport and tourism.

## Key Messages from Options Consultation

There was a high degree of support for the air quality issues, including the wider benefits of good air quality, the links to transport and accessibility and to the findings of the Habitats Regulations Assessment for the WMRSS Phase Two Revision. Some respondents felt there was a need for a specific policy. However, more questioned the usefulness of the issue being addressed in WMRSS.

Care needs to be taken at regional level to make policies practical and implementable. There is no point having a policy which requires local planning authorities to exercise functions for which they have no powers.

## Supporting Text

The National Air Quality Strategy 2007 sets standards for air quality and objectives to be achieved. Responsibility for managing air quality locally rests with local authorities, who have a duty to declare air quality management areas where objectives are not likely to be achieved. This leaves limited scope for regional air quality policy.

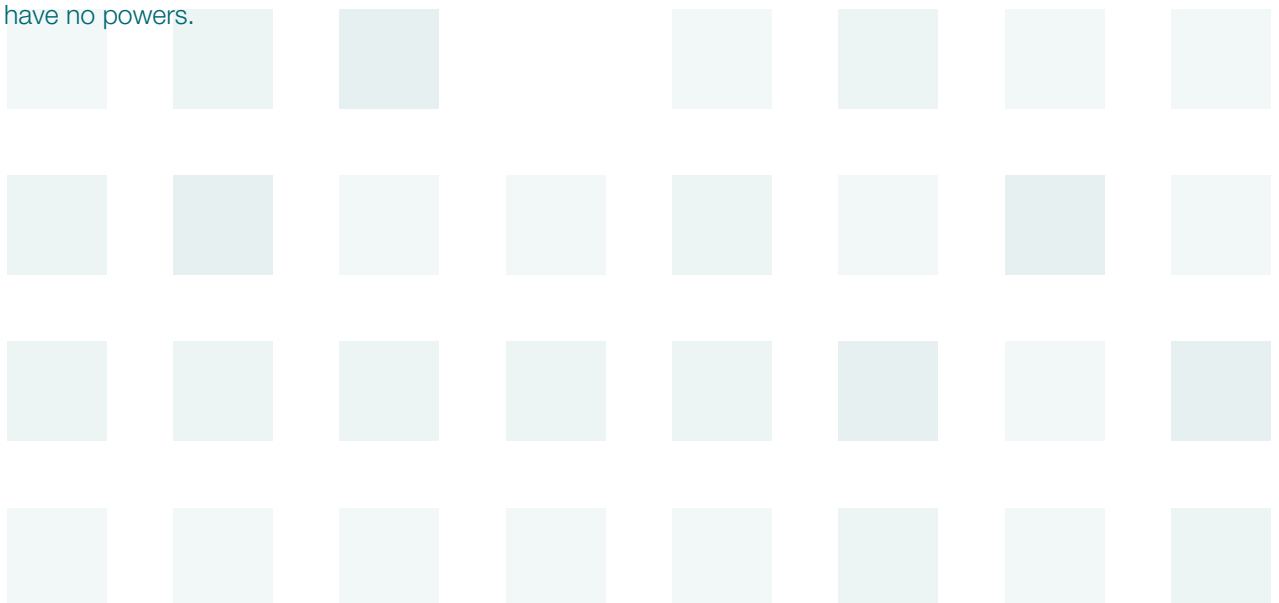
Transport is a major contributor to poor air quality, as recognised by the Government's guidance Delivering a Sustainable Transport System 2008, which aims to contribute to better health by addressing poor air quality associated with transport. Transport and Accessibility policies in the WMRSS will contribute significantly to improved air quality in the region.

The implications of the air quality impacts of new development on European nature conservation sites is covered in the new Policy SR4: Safeguarding the Integrity of European Sites which is being considered as part of the Phase Two Revision.

## Recommended Policy Approach

It is suggested that the text for Air Quality in paragraphs 8.45 and 8.46 of the existing WMRSS could be updated to reflect the following issues:

- (a) The wider benefits which good air quality can provide for human health and biodiversity.
- (b) The links to accessibility, congestion and public transport provision.
- (c) The potential effects of the planned growth in the WMRSS Phase Two Revision.
- (d) The findings from the Habitats Regulations Assessment for the WMRSS Phase Two Revision which highlighted the impacts of the WMRSS Phase Two Revision development proposals on the European nature conservation sites within and beyond the region.
- (e) Any variations in air quality across the region and any actions to help mitigate effects in areas of poor air quality.





# Energy Efficiency - Promoting Energy Efficiency Within Existing Development

## Policy Objectives

The objective was to consider the potential for a requirement that a percentage of the energy needs for new development be provided by on-site or local generation of renewable energy resources / energy efficiency measures.

## Key Messages from Options Consultation

There was a high level of agreement in the Options consultation (83%) on the need for the existing Policy EN2 to be revised to encourage improvements to the energy efficiency in existing buildings as opportunities arise.

However, some local authorities questioned the ability of the planning system to influence the energy efficiency of existing buildings and suggested that this was not a suitable topic for WMRSSs, instead being more of a matter for implementation of national building regulations and specific Supplementary Planning Documents at the local level.

The view was also expressed that this issue was already being addressed by Policy SR3 which was considered as part of the WMRSS Phase Two Revision.

## Supporting Text

There are a number of initiatives at both national and local level that help support energy efficiency in new and existing buildings. These include the EU Energy Performance in Buildings Directive (EPBD) which requires all buildings, domestic and non-domestic, both new and existing to have energy performance ratings; Building Regulations which require all new domestic dwellings to have a "SAP" rating, which is a measure of energy performance and CO2 emissions; and the Government's Code for Sustainable Homes which is a voluntary scheme to promote more sustainable building practices.

The West Midlands Regional Energy Strategy (November 2004) outlines a wide range of measures that could be taken to improve energy efficiency in the industrial, commercial and public, domestic and transport sectors. Only a small range of measures, however, can be influenced at the regional level through the planning system.

Policies to encourage the on-site generation of renewable energy should be placed within the context of an "energy hierarchy" whereby energy demand is reduced through energy efficiency and low energy design before meeting the residual energy demand from first renewable energy and then fossil fuels or grid electricity. This "energy hierarchy" approach, where energy efficiency opportunities are maximised before renewable energy is considered within proposals for **new developments**, was incorporated into Draft Policy SR3 in the WMRSS Phase Two Revision.

There may, however, also be some opportunities to encourage the retrofitting of energy efficiency measures to **existing buildings** through the planning system as part of major refurbishments taking place as part of urban regeneration. For example, where appropriate, there may be opportunities to introduce a requirement that major refurbishments (of a defined scale) submit an Energy Use Assessment alongside a planning application which could then help to identify opportunities to improve energy efficiency.

## Recommended Policy Approach

It is suggested that where opportunities arise, proposals for major developments could be accompanied by an energy use assessment which sets the baseline for the calculation of the proportion of on site generation and describes the measures that are being taken to put the "Energy Hierarchy" into effect.

# Renewable Energy Targets

## Policy Objectives

The Revision will seek to promote the development of renewable energy and low carbon technology resources, subject to appropriate environmental and social safeguards.

The objectives are to review regional targets for renewable energy, as set by the Regional Energy Strategy, and to review the spatial implications of introducing decentralised energy and renewable energy technologies into the region.

## Key Messages from Options Consultation

The Options consultation sought views on three Options for renewable energy<sup>5</sup> targets:

1. Adoption of the national targets for renewable energy,
2. Adoption of Regional Energy Strategy targets (published November 2004), or
3. Adoption of sub-regional targets.

Responses to the Options consultation provided no clear consensus on renewable energy targets although Option 3 (sub-regional targets) was the most popular option (44% of respondents), particularly amongst local authorities. Some respondents favoured a combination of Options 1 and 3, ie. adoption of national targets with a sub-regional variation to reflect resources and needs.

Other key issues identified by respondents included:

- The need for consistency in expressing targets - the national target refers to a percentage of energy generated; whilst the Regional Energy Strategy targets refer to percentage of energy consumed.
- A need for the renewable energy policy to be worded positively and 'dynamically' in line with the economic opportunities, importance of the issue and scale of change required to meet carbon reduction targets.

On the issue of regional targets for specific renewable energy and low carbon technologies, there was no clear consensus but a slight majority of those who expressed a preference were against targets for specific technologies on the basis of the need to retain flexibility to adapt to new technologies and the need for more detailed local work on capacity.

## Supporting Text

The UK Renewable Energy Strategy (July 2009) sets out a path for the UK to meet the legally-binding target that 15% of our energy comes from renewable sources by 2020 - almost a seven-fold increase in the share of renewables in scarcely more than a decade.

The purpose of the UK Strategy is to tackle climate change by reducing the emissions of carbon dioxide, promote the security of energy supply and reduce our overall fossil fuel demand by around 10% and gas imports by 20–30% against what

they would have been in 2020. It also intends to provide opportunities for the UK economy. In parallel with energy saving, nuclear and carbon capture and storage (CSS), the UK Renewable Energy Strategy is a key element of the Government's overall transition plan for setting the UK on the path to achieve a low-carbon, sustainable future that helps address climate change.

The Government's lead scenario suggests that by 2020 the UK could see:

- More than 30% of electricity generated from renewables. Much of this would be from wind power, on and offshore, but biomass, hydro and wave and tidal would also play an important role.
- 12% of heat generated from renewables. The Government expect this to come from a range of sources including biomass, biogas, solar and heat pump sources in homes, businesses and communities across the UK.
- 10% of transport energy from renewables.

The planning system plays a central role in delivering the necessary infrastructure to reduce carbon emissions and ensure continued security of energy supply. Equally, the planning system plays a vital role in safeguarding the landscape and natural heritage.

The UK Renewable Energy Strategy *"expects regions to set targets for renewable energy capacity in line with national targets, or better where possible."*

<sup>5</sup> Renewable energy includes: solar water heating, photovoltaics (rooftop or cladding), biomass heating, biomass CHP, wind generators, micro-hydroelectric, ground source heating and cooling, and air and water source heat pumps. It can also include heat from renewable CHP plants, such as: landfill gas, sewage gas, anaerobic digestion, biomass, and energy from waste.

# Renewable Energy Targets

PPS22 states that “the Regional Spatial Strategy should include the target for renewable energy capacity in the region, derived from assessments of the region’s renewable energy resource potential, and taking into account the regional environmental, economic and social impacts (either positive or negative) that may result from exploitation of that resource potential”. PPS1 also expects regional and local planners to use a robust evidence base to actively plan for, and support, renewable and low-carbon energy generation.

PPS22 also states that “where appropriate, targets in regional spatial strategies may be disaggregated into sub-regional targets. It may also be appropriate to give a broad indication of how different technologies could contribute towards regional targets. But fixed targets for specific technologies should not be set given that rapid technological change may mean that new sources of renewable energy may be developed in the longer term”.

The **West Midlands** currently meets less than 1% of the region’s electricity demand from renewable energy. In order to be realistic and achievable, sub-regional targets would need to take account of the resource opportunities and constraints in those areas. An assessment of the resource opportunities was undertaken as part of the development of renewable energy targets for the Regional Energy Strategy.

With Government support, Advantage West Midlands is currently (March 2010) updating renewable energy resource assessments for the West Midlands. The updated evidence base will identify appropriate

opportunities for renewables as well as any genuine constraints to deployment and will help inform the development of achievable regional and sub-regional targets.

## Spatial Implications of Introducing Decentralised Energy and Renewable Energy Technologies

Renewable energy development will be guided by the resources available for development, together with the economic opportunities, physical constraints and the relevant development criteria. Evidence from the Regional Energy Strategy suggested that there are no broad areas that should be identified as major locations for renewable energy development within the West Midlands, as opposed to any other. Whilst some areas of the region have greater renewable energy resources than others, it seems likely that development will take place in a distributed manner across the West Midlands.

Most renewable energy technologies have the potential to be applied in an urban context. For example, opportunities for renewable energy development may exist on existing industrial estates or other brownfield sites from medium-sized wind turbines through to the installation of building integrated systems. New housing and commercial developments also offer significant opportunities for identifying and utilising large heat loads to support biomass-based community heating schemes and also provide extensive opportunities for the integration of renewable energy technologies into buildings (in line with draft WMRSS Policy SR3).

There is also potential for retrofitting renewable energy systems to existing buildings. There are instances where this would fall within the planning system, for example, as part of major refurbishments taking place as part of urban regeneration.

Opportunities for implementing renewable heat technologies such as biomass boilers, solar water heating or ground source heat pumps particularly exist in those parts of the region that do not have access to the gas network and which therefore currently have to rely on higher cost fuels such as oil and liquefied petroleum gas to supply space heating and hot water.

Whilst it is not expected that there will be the opportunity for the development of large scale renewable energy schemes within designated areas, there may be opportunities for the development of smaller scale renewables in these areas.

It is within the non-designated rural areas of the region that the pressure for larger scale development of renewable energy is most likely to occur, subject to site specific constraints. The highest wind energy resource exists within Staffordshire, Shropshire and Herefordshire although there are increasing opportunities in the rest of the region, as economically viable wind speeds reduce over time.

There are opportunities for biomass, anaerobic and aerobic digestion in most parts of the region, although development should be located as close as possible to fuel sources to minimise carbon emissions from transport.



# Renewable Energy Targets

As explained, further work on renewable energy resources is currently underway. This will inform the development of renewable energy targets for the West Midlands which will be considered as part of the new Regional Strategy process.

The policy approach recommended therefore provides a broad policy framework but, intentionally, no targets have been included in advance of the completion of the technical work currently (March 2010) being undertaken by Advantage West Midlands<sup>6</sup>.

## Recommended Policy Approach

It is suggested that regional policy relating to renewable energy targets should include the following principles:

➤ Local Development Frameworks should include policies and development proposals which contribute to the achievement of the following targets for **electricity**:

a) By 2015 a minimum regional target of x<sup>6</sup> MWe installed generating capacity, from a range of renewable electricity technologies;

b) By 2020 a minimum regional target of x<sup>6</sup> MWe installed generating capacity from a range of renewable electricity technologies. The target should provide at least 15% of the Region's electricity demand by 2020.

Renewable Electricity Targets by Sub-Region By 2020	Installed Electricity Generating Capacity (MWe)
Herefordshire	To be Agreed <sup>6</sup>
Shropshire & Telford	To be Agreed <sup>6</sup>
Staffordshire & Stoke	To be Agreed <sup>6</sup>
Warwickshire	To be Agreed <sup>6</sup>
West Midlands County	To be Agreed <sup>6</sup>
Worcestershire	To be Agreed <sup>6</sup>

➤ The minimum targets for the generation of **heat** from renewable sources outlined below should be achieved by the use of appropriate resources and technologies:

Regional Targets for Renewable Heat	Installed Thermal Capacity (MWth)
2015	To be Agreed <sup>6</sup>
2020	To be Agreed <sup>6</sup>

➤ The regional policy framework, complemented by Local Development Documents, should facilitate the achievement of the following minimum sub-regional targets for electricity by 2020:

➤ A policy for on-site renewable energy generation in new build should be in place, as set out in policy SR3 of the draft WMRSS Phase Two Revision. This would directly stimulate installation of new micro-renewable heat systems.

➤ The Planning Policy Statement supplement on climate change (PPS1) sets out what the Government expects from good planning, and underlines that tackling climate change sits at the centre of all planning considerations. PPS22 sets national planning policy on renewable energy. Local planning authorities should have regard to both these documents when preparing Local Development Frameworks and when taking planning decisions.

➤ The renewable Electricity and heat capacity approved through the planning process should be monitored through the local planning authorities' annual monitoring review. Capacity installed should also be monitored through the regional Annual Monitoring Report (AMR).

<sup>6</sup> Sub-Regional targets will be informed by assessments of the region's renewable energy source potential which are being undertaken by Advantage West Midlands.



# Criteria for Ensuring that Renewable Energy Is Appropriately Located

## Policy Objectives

The Revision will seek to promote the development of renewable energy and low carbon technology resources, subject to appropriate environmental and social safeguards.

The objective is to develop a criteria-based policy for considering the provision of renewable energy resources.

## Key Messages from Options Consultation

A majority (64%) of respondents to the Options consultation favoured a criteria-based policy to ensure that renewable energy is appropriately located (Option 2).

Overall, the criteria considered of most importance were:

- 1 Impact on fauna, flora and animal life;
- 2= Contribution to the global environment;
- 2= Visual Impact;
- 4 Contribution to the local economy;
- 5 Noise;
- 6 Odour;
- 7 Traffic.

## Supporting Text

The planning system needs to deliver swift, consistent and effective decisions in areas where development is appropriate but also apply safeguards to protect areas where development may not be appropriate.

PPS22 states that renewable energy proposals should be positively encouraged by planning authorities and assessed using the criteria set out in the WMRSS. Local Planning Authorities may prepare Local Development Document criteria policies, which focus on key local issues, within the framework provided by national guidelines and the WMRSS.

Whilst it is important that renewable energy is encouraged, it is also important that it is appropriately located and designed. The integration of large-scale renewable energy proposals, such as wind and biomass production, into the region's varied landscapes will require careful consideration. Designated areas in particular need to be protected from inappropriate development. The purposes of land-use planning designations will vary considerably between sites and may not be in conflict with particular forms or scales of renewable energy development. The key test in assessing proposals should be the extent to which they might affect the integrity of the designation.

Minimising any impacts caused by noise, odour, traffic, discharges to the air and watercourses will be important particularly in relation to nearby residential areas and individual dwellings. Visual impact on the landscape is also a relevant issue when determining the acceptability of proposals for large-scale renewable energy.

The wider benefits of renewable energy projects must also be given significant weight as material considerations regardless of scale. These benefits include CO2 reduction, the diversification of local economies, the creation of new jobs and support for the regeneration of rural areas.

## Recommended Policy Approach

- Nationally significant renewable energy infrastructure – energy from biomass and/or waste and onshore wind (>50 megawatts (MW) – should have regard to National Policy Statement for Renewable Energy Infrastructure (EN-3).
- For renewable energy projects less than 50 MW, local planning authorities should consider the following regional criteria alongside national policy guidance and local criteria contained within Local Development Documents:



# Criteria for Ensuring that Renewable Energy Is Appropriately Located

(i) Within the region’s nationally and internationally recognised designations, schemes should be of an appropriate scale and not compromise the objectives of the designation.

(ii) An Environmental Impact Assessment (EIA) will be required for renewable energy projects where the development falls into a category within Schedule 2(3) to the 1999 Environmental Impact Assessments Regulation and the Planning Authority adopts a “screening opinion” that EIA is required. Schemes should minimise and deal satisfactorily with any significant adverse impacts identified in visual and landscape, noise, ecological, ornithological, archaeological and historic, geological or hydrological assessments. Schemes should also minimise and deal with any significant adverse traffic management, air quality, odour, disposal of waste impacts or significant effects on tourist or recreational facilities.

(iii) The wider environmental, community and economic benefits of proposals, whatever their scale, should be given significant weight in determining planning applications.

(iv) Renewable energy schemes should not have a significant adverse cumulative impact in conjunction with other similar developments.

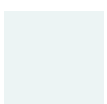
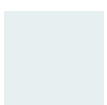
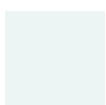
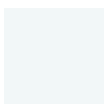
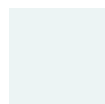
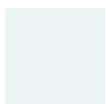
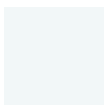
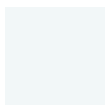
➤ As most renewable energy resources can only be developed where the resource exists and where economically feasible, there should not be a sequential approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments).

➤ Where appropriate, proposals should be facilitated which involve:

(i) Construction and upgrading of fossil fuel power stations that incorporate clean coal technology.

(ii) Dual use of fossil and renewable resources.

(iii) Good quality combined heat and power.



# Positive Uses of the Green Belt

## Policy Objectives

The purpose of the WMRSS revision is to consider whether there is a need for a new regionally-specific policy for the Green Belt which would (a) define its regional and sub-regional roles and (b) define those specific uses that should be encouraged within it.

The WMRSS revision is not about reviewing Green Belt boundaries.

## Key Messages from Options Consultation

Opinion in the Options consultation responses was split between Option 1 (develop a regionally specific Green Belt policy) and Option 2 (apply PPG2), although 11 out of 15 Unitary and County Authorities favoured Option 2. Reasons given for responses included the following:

### Option 1 - Develop a Regionally Specific Green Belt Policy:

Option 1 would allow for the identification of more positive uses through green infrastructure studies, such as improved access and recreation; to reflect the varying needs of people and wildlife. A more regionally specific policy would reinforce green infrastructure, heritage and landscape considerations in improving the Green Belt.

“Option 2 represented ‘old thinking’ with respect to urban fringe management and did not adequately address the need for an integrated relationship between Green Belt and other existing and suggested WMRSS policies (such as Green Infrastructure)”.

Some local authorities also called for WMRSS to review the geographic area of the Green Belt in the context of sub-regional location of housing growth and to develop distinctive sub-regional specific policies related to anticipated pressures, its function, protection and management.

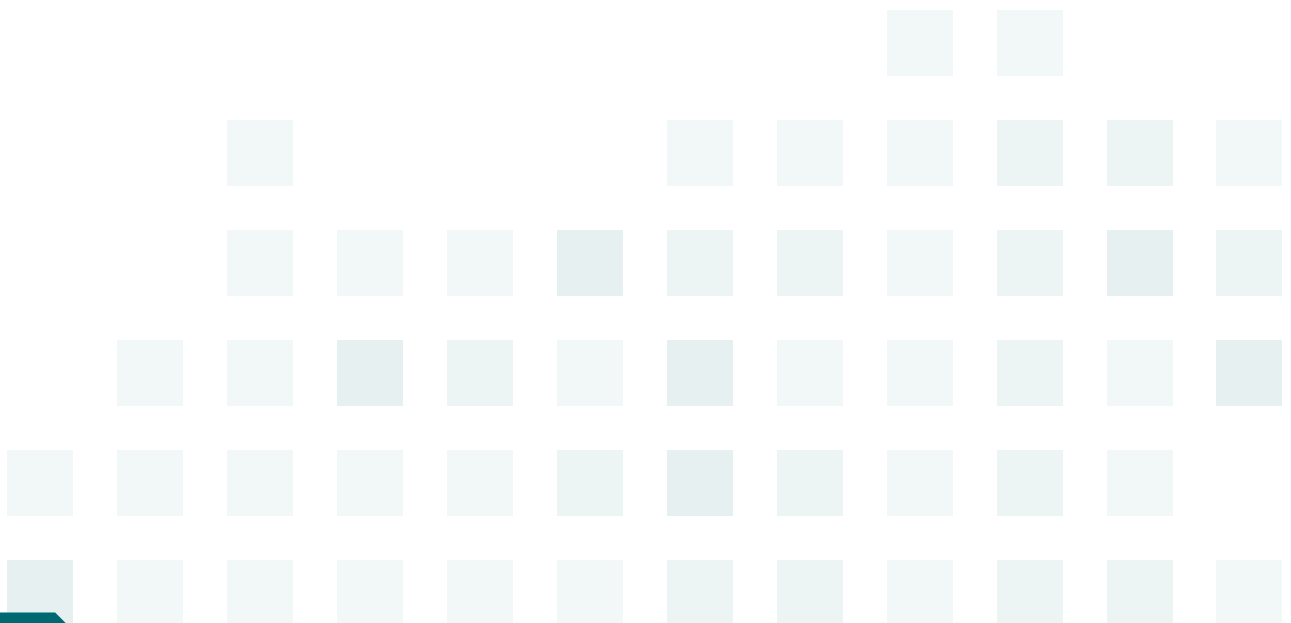
### Option 2 - Apply PPG2:

“PPG2 is already sufficiently clear and particular issues and opportunities will often be specific to location and as such should be addressed in LDFs”.

“Option 1 could potentially lead to proposals taking place within the Green Belt as part of positive use and improvement proposals which could actually damage the Green Belt”.

“Green Belt policy is a longstanding and successful one and we see no reason why it should be altered in favour of a more regionally specific one which could undermine national policy”.

“While we approve and endorse the proposal for a more positive stance on Green Belt uses, we do wonder whether a regional approach to Green Belt is a realistic option given the importance attached to Green Belt policy at the national level”.





# Positive Uses of the Green Belt

## Supporting Text

National policy on Green Belts is set out in PPG2, which includes the purposes of including land in Green Belts, objectives for the use of Green Belt land, a presumption against inappropriate development, and guidance on development that is not inappropriate. This is supplemented by more recent guidance, such as for waste management and renewable energy, which recognise the pressures for such developments in Green Belt locations.

Whilst Green Belt policy is clearly defined in PPG2, there is a wider debate about the role and purpose of the urban fringe. This is reflected in the need to identify the most sustainable locations for new development in the context of the Government's growth agenda.

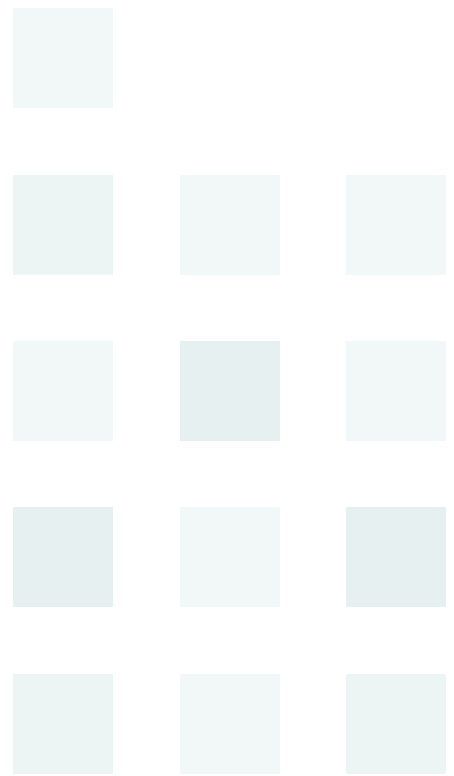
The Green Belt performs an important role in contributing to the regeneration of the region's major urban areas, and to the delivery of the region's spatial strategy.

The presumption against development can result in Green Belt becoming poorly managed and underused, where developers may discourage more positive uses in the hope that development might be accepted. A more positive approach, encouraging appropriate uses, management and enhancement would provide wider benefits.

## Recommended Policy Approach

Green Belt policy is a generally well understood part of wider planning policy. The nature of the policy is its measure of certainty and its generally supported objectives. PPG2 makes the case that the Green Belt has a much broader positive purpose and is a potent policy against the potential urban sprawl of major urban areas into the surrounding hinterland.

However, the national policy does nothing for the positive use or enhancement of the Green Belt. It includes a large part of the urban fringe, which faces growth pressures and many competing land use demands. It provides an opportunity for improved access and recreational activity in locations close to large populations. A stronger strategic approach to the whole of the area would help to deliver more positive social, economic and environmental benefits, such as access, amenity value, recreation, health and protection for sensitive sites.







# Safeguarding Mineral Resources in the West Midlands

## Policy Objectives

The objective is to develop a policy for the safeguarding of brick clays (including fireclays), natural building and roofing stone, hydrocarbons (coal, gas and coalbed methane) and aggregates and minerals and minerals related infrastructure.

One of the national objectives for mineral planning is “to safeguard mineral resources as far as possible” paragraph 9, Minerals Planning Statement 1 (MPS1).

It is important therefore that economically important minerals in the Region are not needlessly sterilised by surface development.

## Key Messages from Options Consultation

Opinions were evenly balanced amongst consultation responses for many of the safeguarding questions. There was no clear consensus on the overall approach to safeguarding, on whether a different approach is needed in urban and rural areas, and on whether coal and Etruria Marl should be safeguarded at regional level.

However, a majority were in favour of safeguarding in designated areas, and for safeguarding infrastructure particularly relating to secondary materials and sustainable transport infrastructure for all minerals.

## Supporting Text

Safeguarding is a planning process necessary to ensure that natural resources are not needlessly sterilised by other forms of development, leaving insufficient supplies for future generations.

Safeguarding mineral resources in plans prepared by County Councils, Unitary Authorities, Borough and District Councils does not imply that they will be worked in the future.

The process is concerned with ensuring that decision makers take into account in policy terms the impact of permitting non- mineral development on economically important mineral resources in the region. On that basis it should not be used as a means of determining the location of mineral supplies that the region may require in the future.

The West Midlands contains mineral deposits which are of national, regional and local significance, and these are gypsum, silica sand, limestone for cement, aggregates, natural building and roofing stone, shale, coal, brick clays and fireclays (see Mineral Safeguarding in the West Midlands map).

Those mineral resources which are considered to be of economic importance within the foreseeable future to the economy and development needs of the region are:-

- **Brick clays** – new housing and built development (including house renovations and extensions), employment and infrastructure.
- **Fireclays** – new housing and built development (including house renovations and extensions), and employment.
- **Aggregates** – new housing, built development and infrastructure provision, employment and providing security of supply for local markets.

➤ **Natural building and roofing stone** – maintaining regional and local distinctiveness and for use in the historic environment.

➤ **Hydrocarbon resources (coal, gas and coalbed methane)** – contribute to national energy security.

There is a water- borne mineral transportation facility operating in the region and that is located on the River Severn. There are three sites (one in Sandwell and two in Birmingham) providing for the rail transportation of mineral related products, two sites (Shrewsbury and in Herefordshire) providing for the transportation of aggregates and two sites (Staffordshire) which are rail connected but have not been developed to transport materials by rail.

If the West Midlands is to ensure that indigenous mineral resources and minerals and minerals-related infrastructure are not needlessly sterilised it needs to put in place a policy framework to identify the most economically important mineral resources and minerals and minerals-related infrastructure to be safeguarded, define the regional mechanisms to secure effective safeguarding and manage the overall process. Failure to properly manage this process will have implications for securing and maintaining supplies of indigenous mineral resources for the region (its citizens and the local economy) and ensuring that future generations have supplies available to meet their needs and the means to transport them to where they are needed in and around the region. A long term view needs to be taken of the mineral resources and infrastructure sites/



# Safeguarding Mineral Resources in the West Midlands

facilities that need to be safeguarded and for this to be embedded in spatial plans across the region.

The population of the West Midlands is forecast to increase significantly. This increase will create additional demand for minerals and competition for land. Mineral resources within the Major Urban Area and Towns and Cities outside the Major Urban Areas are already to a large degree sterilised by built development. Elsewhere the location of many mineral resources coincides with international and national environmental and nature conservation designations such as Areas of Outstanding Natural Beauty and Special Areas of Conservation (and candidates). The impact of these policy constraints could be to restrict future development options for mineral extraction and supply and the development of minerals-related infrastructure.

Policy M1 in the current WMRSS and the draft WMRSS Phase Two Revision requires safeguarding of mineral resources and infrastructure sites/facilities to be secured through local development plans by:

- identifying the resources needed to maintain appropriate levels of planned and future supplies (Bi),
- identifying and safeguarding opportunities for the transportation of minerals (Biv), and
- including policies to safeguard mineral resources from other forms of development (Bv).

However, the existing WMRSS does not specifically define which regionally important minerals and minerals infrastructure needs to be

safeguarded and the mechanisms for achieving those policy requirements. It also does not define how Minerals Planning Authorities in the region should safeguard mineral resources from other forms of development. There is also no recognition of the potential for different approaches to be taken in different areas and for the application of policy to be undertaken in different ways.

In order to avoid economically important mineral resources and minerals and minerals related infrastructure in the region being needlessly sterilised by non-mineral development any policy framework will need to address the following:

- The need for a consistent approach to be taken across the region to avoid the sterilisation of regionally important minerals.
- The need to distinguish between those minerals which are of local, regional and national importance and determine how they will be safeguarded.
- The protection, from alternative uses of land, of existing, planned and potential facilities/sites for the bulk transport of minerals and for the manufacture of mineral-related products and for alternate sources of materials for construction purposes.
- The maintenance of mineral production from existing and planned mineral sites and mineral-related infrastructure by limiting encroachment from non-mineral development through applying buffer or consultation zones.

## Recommended Policy Approach

Local Planning Authorities, Minerals Planning Authorities, the minerals industry and developers need to work together to ensure that the economically important minerals in the region are safeguarded.

Mineral Planning Authorities need to ensure that the following regionally important minerals and minerals and minerals related infrastructure are safeguarded in their LDFs:-

- **Brick clays** – new housing and built development (including house renovations and extensions), employment and providing security of supply for other downstream markets.
- **Fireclays** – new housing and built development (including house renovations and extensions), and employment.
- **Aggregates** – new housing, built development and infrastructure provision, employment and providing security of supply for local markets.
- **Natural building and roofing stone** – maintaining regional and local distinctiveness and for use in the historic environment.
- **Hydrocarbon resources (coal, gas and coalbed methane)** – contribute to national energy security having regard to climate change considerations.



# Safeguarding Mineral Resources in the West Midlands

In order to safeguard these resources the following mechanisms should be used:

- The designation of local Mineral Safeguarding Areas (MSAs) and Mineral Consultation Areas (MCAs), and
- Where appropriate applying development control policies.

Guidance on the identification and designation of MSAs and MCAs can be found in MPS1 Practice Guide and the 2007 British Geological Survey (BGS) Guide to Mineral Safeguarding in England.

In defining these areas reliance should be placed on the best available mineral resource information including information held by the BGS, industry and MPAs.

Minerals resources located in international and nationally designated areas and green belts should not be excluded in determining the extent of MSAs and MCAs. Unless there are clear local circumstances there is no need to differentiate between urban and rural areas in applying safeguarding policies.

In preparing and validating planning applications for non-mineral development on regionally important mineral resources developers and Local Planning Authorities should ensure that they are accompanied by detailed and comprehensive mineral resource assessments and non-mineral development likely to limit the use of and /or encroach on the use and operation of minerals and minerals-related infrastructure by the submission of an infrastructure impact assessment.

Policies should be included in any plans produced to ensure:

- Comprehensive working of permitted reserves in existing quarries.
- The prior extraction of minerals where practical and environmentally acceptable before non-mineral development takes place
- The need to refer regionally significant non-mineral development planning applications to the Regional Planning Body so they can consider if it is in general accordance with the WMRSS where there is a significant quantity of regionally important mineral resources that could be sterilised.

Mineral Planning Authorities will need to record in their Annual Monitoring Report the number of planning applications for non-mineral development on which they were consulted and where objections and no objections were raised on sterilisation grounds.

Local Planning Authorities in collaboration with MPAs should ensure that mineral resources of national importance are safeguarded by identifying the location of the nationally important minerals and including them on any proposals map.

Local Planning Authorities, MPAs and developers should ensure that minerals and minerals-related infrastructure are safeguarded by:

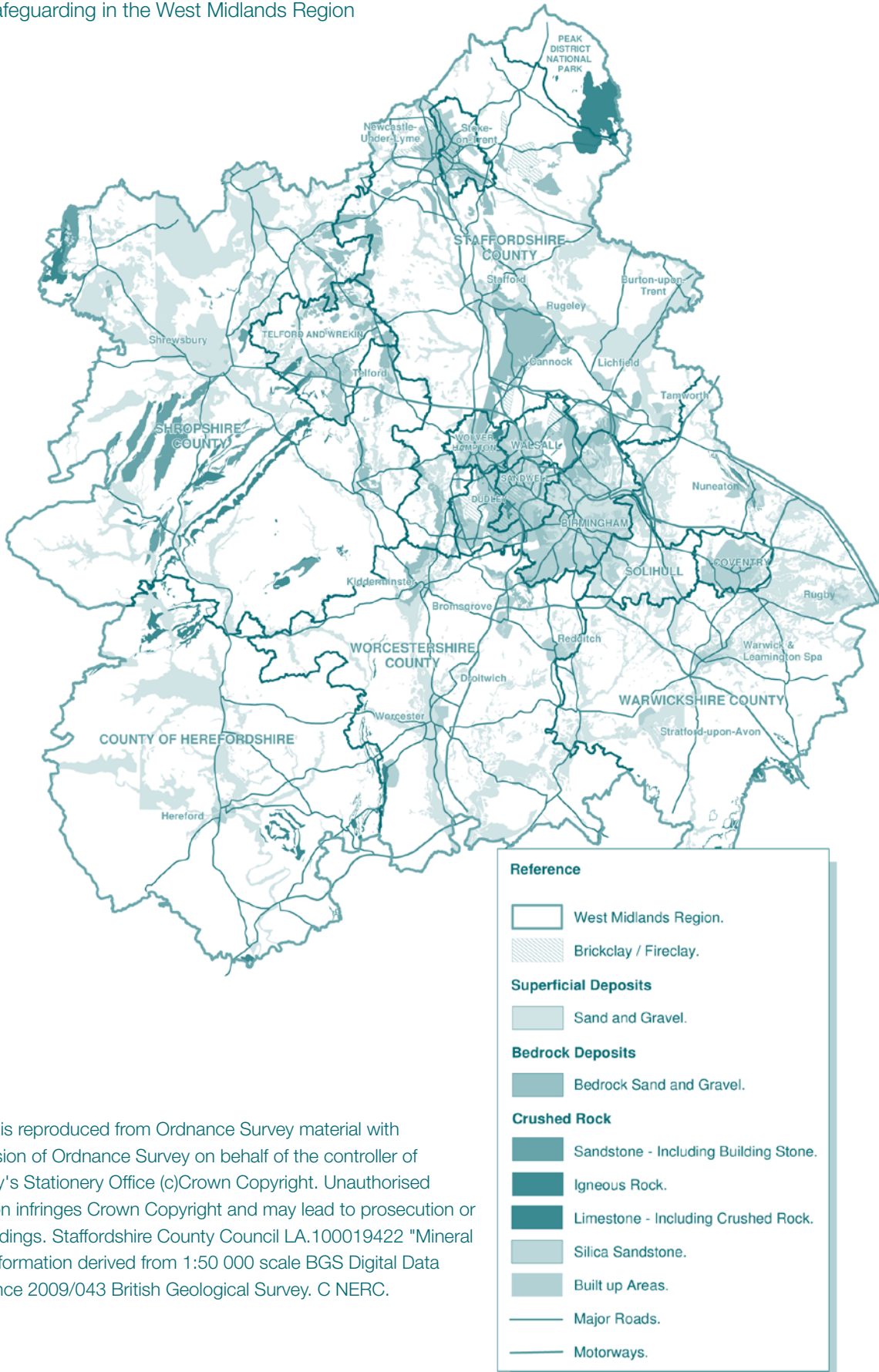
- Identifying sites and facilities of regional importance for the transportation of minerals and minerals-related products.

- Protecting from alternative uses of land which may constrain future use existing, planned and potential facilities/sites for the bulk transport of minerals and for the manufacture of mineral-related products and for alternate sources of materials for construction purposes by designating buffer and consultation zones around important facilities.
- Formulating and applying appropriate development control policies.
- Having regard to the relationships with other policies in the WMRSS particularly T10 freight.
- Requiring all major proposals for the extraction of minerals and manufacture of minerals - related products to be accompanied by a Transport Impact Assessment which should include an examination of the potential to transport the materials to the market by other modes of transportation.



# Safeguarding Mineral Resources in the West Midlands

Mineral Safeguarding in the West Midlands Region



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# Future Brick Clay Provision

## Policy Objective

The Revision objective is to ensure appropriate provision is made in the region for the future supply and demand for brick clays.

While brick clays are found in many parts of England only some are suitable for use in the manufacture of bricks, pipes and tiles, or for environmental and engineering uses. Some valuable clays (including fireclays) are nationally scarce and only occur in limited locations such as the specific outcrops within the West Midlands.

Security of supplies of clay over a period of 25 years is needed by operators to justify and secure the large level of investment required to set up, maintain and modernise existing brick making plant.

## Key Messages from Options Consultation

A majority of respondents to the Options consultation felt that applying brick clay supply requirements to individual brickworks is the most sustainable way of meeting future needs, and all the suggested locational criteria outlined in the consultation were supported.

However, there was no consensus on whether the shortfall in clay supplies could be met from within region, and few suggestions for policies on stockpiling Etruria Marl and fireclays.

## Supporting Text

In the West Midlands, the principal brick clay resource is the Etruria Formation and the main outcrops occur in Staffordshire and parts of

the Black Country. Nationally, the Etruria formation covers only 1% of the total outcrop area of the brick clay resources. Despite the small size of the outcrop it is a very important brick clay resource and is covered by planning permissions over 9% of its area. However, 35.3% of the resource is sterilised by urban development. This resource of premium quality clay is confined to a relatively small and fragmented outcrop which is almost exclusively in an area with a high population density.

In the region the largest users of clay are the brick industry reflecting the concentration of working in and around the conurbation and Stoke on Trent.

Fireclays are derived from coal measures, although almost exclusively as a by-product of opencast coal extraction. Although comprising less than 7% of total consumption, these are important premium quality clays which are used in relatively high value buff brick products manufactured at sites across the Midlands.

The WMRSS Phase Two Revision (up to 2026) proposes major new housing development (including house renovations and extensions) and additional employment sites across the region. The demand for bricks primarily reflects activity in the house building sector, although bricks are being used for other forms of development. An average three bedroom house requires some 8,500 bricks (equivalent to 25 tonnes of clay) in its construction.

Paragraph 3.4 in Annex 2 to Minerals Planning Statement 1 (MPS1) requires Minerals Planning Authorities (MPA's) to provide a stock of

permitted reserves normally sufficient for 25 years of production to support the level of actual and proposed investment required for new and existing manufacturing plant and the maintenance and improvement of existing plant and equipment.

Based on a 2007 baseline there were 18 brickworks and tileries which needed future supplies of clay, but only 17 were operational (see Brick and Tile Factories in the West Midlands map). The baseline of 2007 was chosen to reflect normal operating conditions before the economic recession impacted on the brick industry. The industry believes that the current downturn in production will be temporary and that following the end of the recession production will return to pre-recession levels.

Of the 17 operational brickworks/tileries, data was only available for 16. Those 16 require annual clay resources of 2.1 million tonnes in total to be made available. Seven of the brickworks/tileries had sufficient supplies of clay available to them to sustain production for 25 years from the baseline of 2007. In order to meet the needs of the remaining 9 facilities to have a 25 year supply an additional 13 million tonnes of clay needs to be made accessible and available to the industry based on 2007 figures.

West Midlands is a net importer of fireclays with 65% being imported from the fireclay Durham and Leicestershire/South Derbyshire coalfields. If indigenous resources of fireclay can be fully utilised, then they can play an important part in maintaining the supply of raw materials to the regional brick industry and reducing reliance on imports from outside the region.



# Future Brick Clay Provision

## Recommended Policy Approach

MPAs will need to work together to provide for shortfalls in future supplies of brick clays and fire clays in the region identified as a result of information from annual monitoring surveys. In carrying out this work MPAs will need to consider whether the shortfalls in clays can be met by one or more of the following:

- Appropriate provision being made in Local Development Frameworks (LDF's) within and/or outside the region and implemented through the granting of planning permission.
- Planning permission being granted for specific sites coming forward outside allocated areas.
- Prior extraction of minerals as part of proposals from non-mineral development where extraction is economically and environmentally acceptable.
- Planning permission being granted for long term off-site strategic stockpiles.

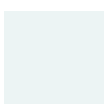
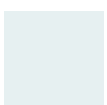
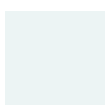
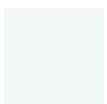
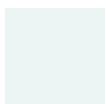
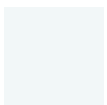
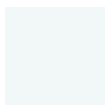
MPAs can only address future requirements for brick clays where they are known i.e. where manufacturers are able to provide information on their annual consumption requirements and where evidence shows that a viable resource is available within the area, of sufficient quality to meet the requirements of manufacturers.

MPAs and the brick clay industry will need to work together to monitor the level of manufacturing capacity in the region, the trends in brick and tile production together with any other clay derived products, changes to the industry and manufacturing processes in response to climate change now and in the future and the level of clay resources and permitted reserves within and outside the region required to meet future demands.

MPAs and the brick clay industry will need to carry out an early review and update of the 2007 baseline data to determine the extent of shortfalls in future supplies of brick clays and fireclays in the region.

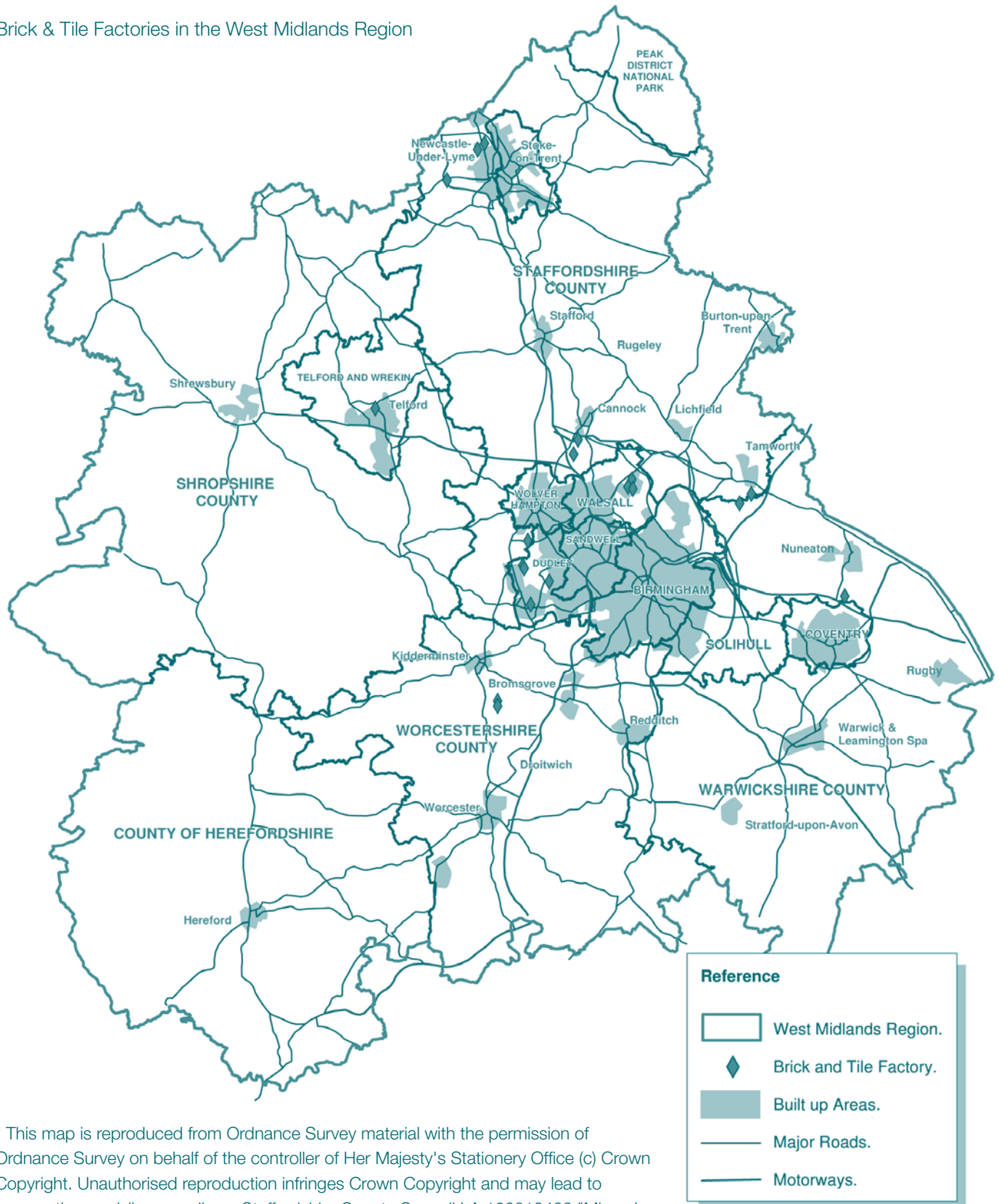
MPAs working with the brick clay industry, developers and local planning authorities should look for opportunities to develop and operate long term off-site stockpiles of clays to maintain future brick production in the region. Any major proposals for off-site stockpiling should be accompanied by a Transport Impact Assessment which should include an examination of the potential to transport the materials from source to stockpile and stockpile to market by other modes of transport.

Where appropriate, existing, planned and potential off-site clay stockpiling sites/facilities should be safeguarded in LDFs to ensure that supplies are maintained and not sterilised by non-mineral development.



# Future Brick Clay Provision

Brick & Tile Factories in the West Midlands Region



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# WMRSS Policies

## March 2010

<b>Towards a More Sustainable Region</b>	
SR1: Climate Change	Phase 2 Revision
SR2: Creating Sustainable Communities	Phase 2 Revision
SR3: Sustainable Design and Construction	Phase 2 Revision
SR4: Improving Air Quality for Sensitive Ecosystems	Phase 2 Revision
<b>Urban Renaissance</b>	
UR1: Implementing Urban Renaissance – the MUAs	June 2004
UR1A: Black Country Regeneration Policies	January 2008
UR1B: Housing and Employment Land	January 2008
UR1C: Strategic Office Development in the Black Country	January 2008
UR1D: Retail Floorspace	January 2008
UR2: Towns and Cities Outside Major Urban Areas	June 2004
UR3: Enhancing the role of City, Town and District Centres	June 2004
UR4: Social Infrastructure	June 2004
<b>Rural Renaissance</b>	
RR1: Rural Renaissance	June 2004
RR2: The Rural Regeneration Zone	June 2004
RR3: Market Towns	June 2004
RR4: Rural Services	Phase 3 Revision
<b>Communities for the Future</b>	
CF1: Housing within the Major Urban Areas	Phase 2 Revision
CF2: Housing beyond the Major Urban Areas	Phase 2 Revision
CF3: Levels and Distribution of New Housing Development	Phase 2 Revision
CF4: Phasing of New Development	Phase 2 Revision
CF5: The Re-use of Land and Buildings for Housing	Phase 2 Revision
CF6: Making Efficient Use of Land	Phase 2 Revision
CF7: Delivering Affordable Housing	Phase 2 Revision
CF8: Delivering Mixed Communities	Phase 2 Revision
CF9: Sites for Gypsies and Travellers	Phase 3 Revision
CF10: Managing Housing Land Supply	Phase 2 Revision
<b>Prosperity for All</b>	
PA1: Prosperity for All	June 2004
PA2: Urban Regeneration Zones	June 2004
PA3: High-Technology Corridors	June 2004
PA4: Development related to Higher/Further Education and Research Establishments and incubator units	June 2004
PA5: Employment Areas in Need of Modernisation and Renewal	June 2004
PA6: Portfolio of Employment Land	Phase 2 Revision
PA6A: Employment Land Provision	Phase 2 Revision
PA6B: Protection of Employment Land	Phase 2 Revision
PA7: Regional Investment Sites	June 2004
PA8: Major Investment Sites	June 2004
PA9: Regional Logistics Sites	June 2004
PA10: Tourism and Culture	Phase 3 Revision
PA11: The Network of Town and City Centres	June 2004
PA11A: Brierley Hill and Dudley	January 2008
PA12: Birmingham's Role as a Global City	June 2004
PA12A: Comparison Retail Floorspace Requirements	Phase 2 Revision
PA12B: Non-Strategic Centres	Phase 2 Revision
PA13: Out-of-Centre Retail Development	Phase 2 Revision

PA13A: Office Development Requirements	Phase 2 Revision
PA13B: Out-of-Centre Office Development	Phase 2 Revision
<b>Prosperity for All</b>	
PA13C: Regional Casinos	Phase 2 Revision
PA14: Economic Development and the Rural Economy	June 2004
PA15: Agriculture and Farm Diversification	June 2004
<b>Quality of the Environment</b>	
QE1: Conserving and Enhancing the Environment	Phase 3 Revision
QE2: Restoring degraded areas and managing and creating high quality new environments	Phase 3 Revision
QE3: Creating a high quality built environment for all	Phase 3 Revision
QE4: Greenery, Urban Greenspace and Public Spaces	Phase 3 Revision
QE5: Protection and enhancement of the Historic Environment	Phase 3 Revision
QE6: The conservation, enhancement and restoration of the Region's landscape	Phase 3 Revision
QE7: Protecting, managing and enhancing the Region's Biodiversity and Nature Conservation Resources	Phase 3 Revision
QE8: Forestry and Woodlands	Phase 3 Revision
QE9: The Water Environment	Phase 3 Revision
EN1: Energy Generation	Phase 3 Revision
EN2: Energy Conservation	Phase 3 Revision
M1: Mineral Working for Non-Energy Minerals	Phase 3 Revision
M2: Minerals - Aggregates	Phase 3 Revision
M3: Minerals - The Use of Alternative Sources of Materials	Phase 3 Revision
M4: Energy Minerals	Phase 3 Revision
W1: Waste Strategy	Phase 2 Revision
W2: Targets for Waste Management	Phase 2 Revision
W3: The Need for Waste Management Facilities	Phase 2 Revision
W4: Protection of Existing Waste Management Facilities	Phase 2 Revision
W5: The Location of New Waste Management Facilities	Phase 2 Revision
W6: Sites outside the Major Urban Areas and Other Larger Settlements	Phase 2 Revision
W7: Waste Management Facilities and Open Land	Phase 2 Revision
W8: Hazardous Waste – Safeguarding Sites	Phase 2 Revision
W9: Construction and Demolition Waste	Phase 2 Revision
W10: Sites for Contaminated Soils	Phase 2 Revision
W11: New Sites for Landfill	Phase 2 Revision
W12: Hazardous Waste – Final Disposal Sites	Phase 2 Revision
<b>Transport &amp; Accessibility</b>	
T1: Developing accessibility and mobility within the Region to support the Spatial Strategy	June 2004
T2: Reducing the need to travel	June 2004
T3: Walking and cycling	June 2004
T4: Promoting travel awareness	June 2004
T5: Public Transport	June 2004
T6: Strategic Park & Ride	Phase 2 Revision
T7: Car Parking Standards and Management	Phase 2 Revision
T8: Demand Management	Phase 2 Revision
T9: The Management and Development of National and Regional Transport Networks	June 2004
T10: Freight	June 2004
T11: Airports	Phase 2 Revision
T12: Priorities for Investment	Phase 2 Revision



Any queries relating to the Interim Policy Statements or Policy Recommendations should be directed to:

**David Clarke**

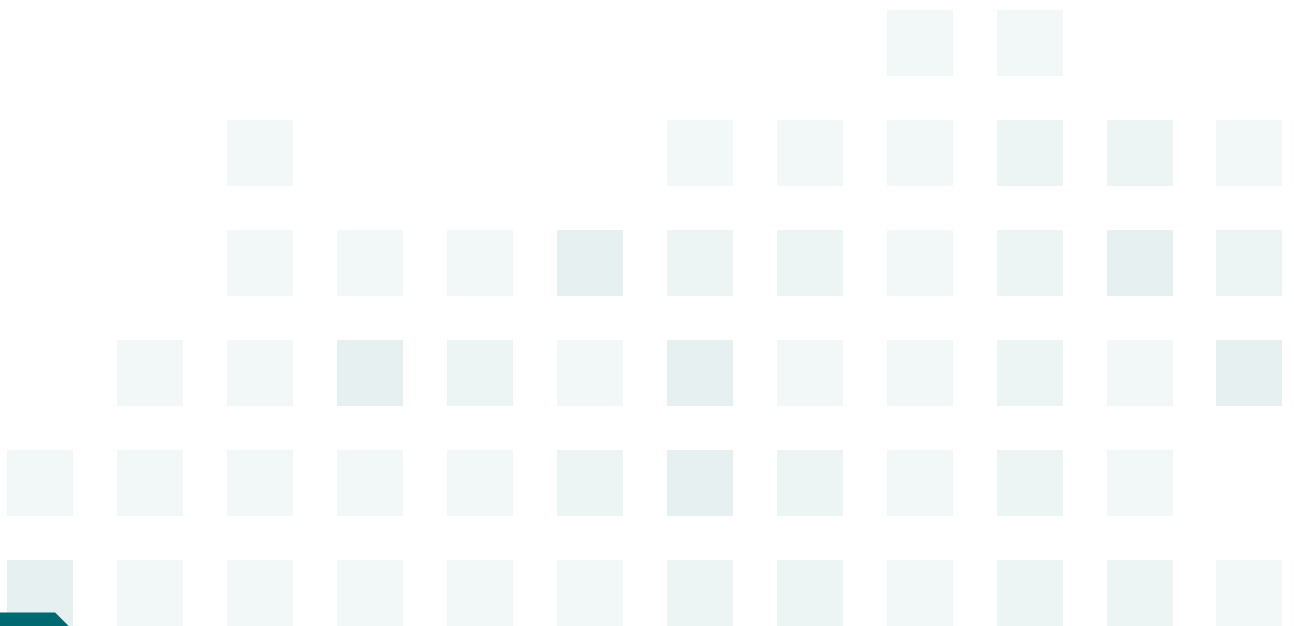
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