The Federation of Small Businesses
West Midlands Policy Unit

Response to
Consultation on the
West Midlands Regional Spatial Strategy
Phase Two Revision Consultation

March 2007

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INTRODUCTION

The Federation of Small Businesses (FSB) is the UK's largest lobbying organisation representing the self-employed and owners of small businesses. Founded in 1974, the FSB has over 200,000 members across all industry trades and sectors within the UK. In the West Midlands the FSB has 16,247[1] members employing over 200,000 people[2]. This response is on behalf of our members here in the West Midlands.

Small Business Contribution to the Economic Success of the West Midlands

Taking into account the figures from the SME Statistics UK and Regions 2005[3], small businesses in the West Midlands make a significant contribution to the region's economy.

According to the SME Statistics UK & Regions 2005, the West Midlands has over 353,000 businesses of which 99.2% are classified as small businesses (i.e. under 50 employees) and of those 95.1% are classified as micro businesses (i.e. under 10 employees). The contribution of small businesses to the success of the West Midlands is clearly demonstrated by these figures:

All industries	***Enterprises***	***%***	***Employment (/ 1,000)***	***%***	***Turnover (/ £million)***	***%***
Sole Traders	251,320	*71.1*	278	*14.4*	15,399	*8.0*
1-4	66,410	*18.8*	192	*9.9*	16,854	*8.8*
5-9	18,295	*5.2*	128	*6.6*	12,156	*6.4*
10-19	9,450	*2.7*	132	*6.8*	11,931	*6.2*
20-49	5,040	*1.4*	155	*8.0*	14,824	*7.7*

General Comments:

We are pleased that decisions have been taken to review the West Midlands Regional Economic Strategy (WMES) and the West Midlands Regional Spatial Strategy (WMRSS) at the same time so that both strategies can be more closely aligned and hope that this will ensure that targets for housing and infrastructure delivery are better matched.

Secondly, small and micro businesses contribute 45.7% of employment and 37.1% of turnover within the region[3]; therefore it is important that the strategy should adequately address the issues and challenges faced by small businesses within the West Midlands.

Feedback from FSB members suggests that the issue of most concern to them is Infrastructure in general, and Transport in particular. There is considerable feeling that years of under-investment in our roads and rail networks, specifically, is now causing significant difficulties for the sustainability and growth of the small business sector in the West Midlands. The lack of an integrated Transport network affects all parts of the Region, although there is a greater impact in certain areas, most notably the Black Country, Stoke-on-Trent and Birmingham.

"There is clear evidence that a comprehensive and high-performing transport system is an important enabler of sustained economic prosperity: a 5 per cent reduction in travel time for all business and freight travel on the roads could generate around £2.5 billion of cost savings – some 0.2 per cent of GDP." *Eddington Report*[4]

Although we recognise that this is only a partial review of the 2004 WMRSS, the issues surrounding the totally inadequate transport infrastructure and the new targets for

[1] As at January 2007
[2] Extrapolated from FSB Lifting the Barriers to Growth 2006 Survey
[3] http://www.sbs.gov.uk/sbsgov - SME Statistics UK & Regions 2005
[4] http://www.hm-treasury.gov.uk/independent_reviews/eddington_transport_study/eddington_index.cfm

housing, together with jobs cannot be ignored and are inexorably linked together; in our opinion, they cannot and must not be taken in isolation.

Judging by the recently published Eddington Transport Study there appears to be over reliance on road pricing so there is not seen to be much hope for an improved transport infrastructure – this is a key area to be addressed.

Key requirements include:

- improvements to the M5/M6/M42;
- a south-western orbital loop from the M5 to the M6;
- the construction of simple slip roads, underpasses/flyovers to relieve local bottlenecks;
- additional rail tracks in and out of Birmingham New Street Station;
- the electrification of the Newcastle-Nottingham-Birmingham-Bristol line;
- Building of a Parkway-style station to the east of Worcester at the intersection of Hereford/London and the Bristol/Birmingham lines.

These problems must be properly recognised, with appropriate solutions and financial resources put forward by Government.

Questionnaire on: Spatial Options – Housing

Please note: Complete the "Yes" "No" "Comment" boxes with an "X"

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If you need more space, please attach extra sheets and refer to the question numbers.

H1: What overall level of new housing development do you think is appropriate to plan for across the Region?

Options	Level of Demand 2001-2006 (gross) (please tick)	Yes (please tick)	No (please tick)	Comment
One	381,000			
Two	491,200	✓		This is achievable. It must be noted however that some parts of the region such as Rugby, Worcester and Telford face large expansion, which might be impossible to build within the respective city limits. Considerable investment in infrastructure required: water, sewers, schools, etc as well as roads and public transport.
Three	575,000		✓	Small businesses are often the bedrock of communities, whether rural or urban and are concerned that this level of housing growth will have a detrimental effect on the quality of life in those communities and will actually work against the plans to regenerate the region.

It is important that, in developing higher levels of housing across the region, the contribution made by the small business sector to the quality of life in the West Midlands is not overlooked. Underpinning the concept of quality of life is the way in which individuals relate to their environment and communities. Their personal quality of life is greatly enhanced if they live in a safe, secure, attractive and properly functioning community. Key to this is variety – of homes, shops, jobs, schools and lifestyles. High Streets with a good mix of independent retailers among the chains; good employment prospects; reliable transport links; low crime rates; responsive police forces who work with the community and who recognise the impact of crime on businesses, and good schools, are at the very heart of sustainable and vibrant communities. Maintenance of a high quality rural life is dependent on a successful and profitable agricultural industry, local post offices, banking facilities, pubs and schools - as well as knowledge economy workers.

The small business community is very well placed to ensure much of this variety is in place for safe and secure communities to thrive. However, they need to be properly considered when decisions about the community are taken and not automatically 'lumped' with the large business sector. Neither should they be excluded simply because they are small and hard to reach. Any regional strategies must recognise the vital role of the small business sector and work with them, not simply see them as an additional revenue stream or a route to delegate responsibility to them for community cohesion.

H2: Can you suggest another level? There needs to be robust evidence to support it.

Level	Evidence Base

H3: For each of the Options do you think that the balance of development between the MUAs and other areas is acceptable? Please see Table One on page 24 and the section on housing distribution for a more detailed breakdown of the numbers to Local Authority level.

Options	Balance of development in MUAs	Comment
One	53% MUAs 47% other areas	Balance fair and achievable
Two	51% MUAs 49% other areas	Balance fair and achievable
Three	50% MUAs 50% other areas	This could create problems for towns like Worcester, Rugby and Telford. Overall, consideration needs to be given to balanced developments, including opportunities for businesses, in the shire villages.

H4: Do you think that the capacity of the construction industry, including housebuilding, will be sufficient to meet the levels of housebuilding set out in the housing Options?

Options	Level of Demand 2001-2006 gross	p.a.	Yes (please tick)	Comment
One	381,000	15,200		
Two	491,200	19,600	✓	See response to H5.
Three	575,000	23,000		

H5: What measures could be included in WMRSS policy to minimise these impacts?

Comments:

We would like to see a greater recognition of the importance that skills, rather than qualifications, are what businesses require. The promotion of the benefits by schools of higher education over vocational training should be questioned. Not all school leavers wish to remain in education after 16, but the pressure to gain higher level qualifications is high and the status of work-based training has become devalued. Many small businesses experience shortages of skilled employees, notably in the construction industry. The levels of house-building put forward in these options will be unattainable without a large skilled workforce. This will be especially true for affordable housing plans as currently workers with the requisite skills are scarce and so charge premium rates for their services.

A programme to provide the right levels of skilled construction workers should be developed in conjunction with colleges and businesses as soon as possible.

However, we are concerned that it will not be possible to train sufficient people to the relevant standard, bearing in mind the forthcoming 2012 Olympic Games and the proposed Milton Keynes development, even if the Region is able to attract a large migrant workforce to cover some of the gaps.

H6: Table One and Table Two on page 24+25 show new housing development across all local authorities in the Region. **What do you think about the overall balance of proposals under each of the Options?**

Comments:

These proposals seem to be at odds with reality.

H7: You may wish to consider specific parts of the Region, please set out below any comments you wish to make on any part of the Region. Please specify the area in which you are commenting.

Comments:

H8: In particular, do you think that Burton upon Trent should be a foci settlement, accommodating significant development on greenfield land?

Comments:

Yes bot should be. Since we do not have enough Brownfield land the only option will be to use Greenfield. Given the expected congestion on the A38 with ongoing development, this is going to put a large strain on the entire infrastructure across the whole Burton upon Trent area.

H9: Do you think that the currently identified sub-regional foci of Worcester, Telford, Shrewsbury, Hereford and Rugby should fulfil this role, accommodating significant development on greenfield land?

Yes ■ No X Comment X
The Option 3 forecasts for these towns can only be achieved by building on Greenfield land outside the city/town boundaries, often in areas of outstanding beauty - the policy could cause much resentment and a fall in house prices for existing residents.

Affordable Housing & Housing Mix

H10: Do you think that the proposed approach where the WMRSS provides a Regional target and where Local Planning Authorities provide local targets through the Local Development Frameworks process is appropriate?

Comments:
It will work, but smacks of a top-down directive.

H11: What would the implications be of having a District level affordable housing target (as a minima) in the WMRSS?

Comments:
Good - local people know their needs and what land is available. District councils could call upon the local knowledge of their town and parish councils. The whole planning/building cycle could be speeded up.

H12: Do you have any other ideas on how levels of affordable housing delivery can be better directed by the WMRSS?

Comments:
For the last 50 years the private sector rate of build has varied by no more than 20% per annum around 14,000 per annum. Achievement of the required affordable housing build rates will need something like the old and successful council housing programme, which was how in the early sixties 300,000 dwellings per year were built. On the Continent things are done very differently, using apartments for young people before moving on to houses as they get older.

H13: Evidence from monitoring suggests that no more than 3,000 affordable houses, with subsidy, are likely to be built each year across the Region. **Do you have robust evidence to support or contradict this view?**

Comments:
The graph shown at figure 6.1, page 100 of the 2005 Regional Housing Market Summary report, supports this fact. Annual build rates of affordable housing have been almost constant for the last 20 years.

H14: Should the WMRSS identify those parts of the Region with a relatively high need for social housing where a lower threshold for negotiating Section 106 agreements with the private sector should be considered in LDDs?

No ■ Yes – which parts of the Region ■
Sounds sensible.

H15: Do you have any robust evidence on an appropriate housing mix within new developments that are needed in different parts of the Region?

Evidence:	Area:

Managing Housing Development

H16: Options Two and Three imply release of land in the foci and other urban areas earlier than anticipated in the WMRSS – do you agree with this approach?

Yes ■ No X Comment X
Option 3 has yet to be proved

H17: It could be considered that the Government's growth agenda implies that the use of maxima targets for areas outside the MUAs is inappropriate – do you agree with this approach?

Yes ■ No X Comment ■

H18: Do you think the use of minima targets for the MUAs is still appropriate?

Yes X No ■ Comment ■

Questionnaire on: Spatial Options – Employment

Please note: Complete the "Yes" "No" "Comment" boxes with an "X"

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Employment Land

E1: Do you agree that future employment land requirements should be quantified in the WMRSS? If employment land is not quantified in the WMRSS, individual authorities will calculate their own land requirements, the WMRSS would have general guidance on the type of methodology that could be used.

Yes X **No** **Comment** ■

E2: If the amount of employment land requirements is included, should it be broken down to Strategic Authority or district levels?

Strategic Authority Level X **District Level** X **Comment** ■

E3: Do you agree with the principle of a reservoir of employment land?

Yes X **No** ■ **Comment** X
Yes. It is important to maintain a level of employment land – not least to provide places of work for all the increased households in the Region. There will be considerable pressure on land, particularly in the urban areas, for housing development, but sufficient employment land must be retained to ensure sustained economic prosperity in the future. This is particularly true for manufacturing sites. However, the manufacturing sector is changing rapidly and although its demise has been regularly foretold, this sector still provides a significant level of employment (albeit lower than in past decades) and is a major contributor to the economic health of the region. It is important that the needs of this sector are not overlooked in the rush for new houses and that future planning guidelines allow for adequate manufacturing activity across the West Midlands.

E4: What period of time should the reservoir cover?

5 years ■	7.5 years ■	10 years ■	Suggested years ■

E5: Should employment land requirements in the MUAs be identified as maximum or minimum figures? i.e. should the reservoir figures identified in Table Three on page 38, act as maximum or minimum figures.

Minimum X	Maximum ■

E6: Outside of the MUAs should employment land figures be identified as maximum or minimum figures?

Minimum X	Maximum ■

E8: Do you have any comments on Table Three? For example, you may wish to consider whether the figures are sufficient to meet the employment land requirements of a particular area or whether there would be any conflict with the policy objectives of the Spatial Strategy.

Comments:

E7: Should employment land requirements set out in Table Three on page 38, be adjusted to take account of:

	Yes	No	Comments and Area comments relate to:
Number and type of households			
Anticipated changes in past trends			
Labour supply growth			
Population	X		
The need to provide a portfolio of employment sites	X		
Increased need for waste management facilities, see waste Options.	X		Increased economic activity will bring higher levels of waste however this should not be a reason for stifling economic success or imposing excessive regulation. This issue should be worked through in conjunction with businesses to ensure they are not being so constricted that their businesses become unviable.
Areas of deprivation and employment need			
Other suggestions			

Protection of Employment Land

PEL1: Should the WMRSS give more guidance on the need to retain employment sites which can contribute to the portfolio of employment land?

Yes X No ■ Comment ■

PEL2: Should the WMRSS identify the need to protect waste management sites from competing uses?

Yes X No ■ Comment ■

Regional Investment Sites

RIS1: Do we fill the gaps in the provision of RIS?

Yes ■ No ■ Comment X
If the RSS does not, then who does? Local Authorities, British Land, AWM, developers or a combination of all four? Incredibly difficult to forecast, it is however important to have a comprehensive mix available if we are to ensure we can attract future Regional Investment.

RIS2: If yes, what processes should be used for filling the gaps in provision?
For example, the WMRSS could set the context for sub-regional studies which would consider gaps in provision.

Comments:

RIS3: Is there a need to change the policy on the control of uses on RIS?
The current WMRSS policy restricts development to high-quality uses falling within use class B1 for example, offices and research and development facilities. In some parts of the Region high quality B2 (general industrial) uses are also permitted.

Yes ■ No ■ Comment ■

Major Investment Sites

MIS1: Do you think that the WMRSS has adequate MIS provision?
You should also consider the adequacy of MIS provision in the event that Ansty is not maintained as a MIS

Yes ■ No ■ Comment ■

MIS2: If no, what are the options for additional provision?

Yes ■ No ■ Comment ■

MIS3: Should more flexibility be introduced to the MIS policy?
For example: the current policy restricts occupation of a MIS to a single user. Do you agree that this should continue to be the case?

Yes X No ■ Comment X
More flexibility should be introduced.

Regional Logistics Sites

RL1: Significant growth in logistic provision in the Region is anticipated.
Should part of this growth be accommodated on RLS?

Yes X No ■

RL2: If yes, how many RLS are needed?

Comments:
Demand will dictate.

RL3: The Stage Two study recommends the following criteria for RLS. Do you agree?

Criteria	Yes	No	Comment
At least 50 hectares of development land available.		X	Too rigid
Good rail access. Defined as: a generous loading gauge which is capable of accommodating inter modal units on standard platform wagons, the ability to handle full length trains, available capacity to run freight train services and permits full operational flexibility.	X		Rail access is preferable, but should not be the only criteria.
Has good quality access to the highway network. Defined as being served by the national motorway network or major non-motorway routes which show low levels of network stress (congestion) and allow reasonable vehicle operating speeds.	X		
A suitable configuration which allows large scale high bay warehousing, inter modal terminal facilities, appropriate railway wagon reception facilities and parking facilities for all goods vehicles both those based on the site and visiting the site.	X		Preferential commercial parking
A need for such facilities due to demand from the logistics market which cannot be met in the medium to long term by existing capacity.			Need more detail to answer
Located away from incompatible neighbours, allowing 24 hour operations no restrictions on vehicle movements.	X		This is preferable
Has good access to labour. Defined as being a sub region of employment need, having reasonable levels of qualification at NVQ Level 1 and 2 and opportunity to improve qualification levels, being a net exporter of lower order labour, and having a competitive wage rate for relevant lower order occupations.			What is meant by 'lower order labour'?
Minimising the impact on the local environment.	X		
Suggest other criteria	X		Public transport to site (i.e. buses) for employees.

RL4: WMRSS Policy PA9 currently identifies Telford and North Staffordshire as being priority locations for RLS. A rail freight facility is already under construction in Telford which will play an important sub-regional role serving the west of the Region. No RLS provision has been made in North Staffordshire.
Is North Staffordshire still an appropriate location for RLS provision?

Yes X **No** ■ **Comment** X
N Staffs should have RLS provision. There are already several distribution hubs in the Trentham Lakes area (M&S, Sainsburys, Screw Fix + 6 other major companies).

RL5: Do you agree that these areas are the best broad locations for RLS provision?

Broad Location	Yes	No	Comment
A: Based around the M6 Toll, A5, A38, West Coast Main Line (WCML) and Derby to Birmingham railway line transport corridors. Covers the administrative areas of the eastern part of East Staffordshire, Lichfield and Birmingham to the north of the M6.	X		
B: Based around the M6 Toll, M6, M54, A5, Stour Valley railway line, Cannock Branch railway line and the Wolverhampton to Telford railway line transport corridors. Covers the administrative areas of Wolverhampton, South Staffordshire (except the area to the west of Dudley), Walsall and Cannock Chase.	X		
C: Based around the M6 Toll, A5, M42, WCML, Derby to Birmingham railway line, and Whitacre and Nuneaton railway line transport corridors. Covers the administrative areas of Tamworth and North Warwickshire.			
D: Based around the M6, M69, A5, WCML and Rugby and Birmingham railway line transport corridors. Covers the administrative areas of Nuneaton and Bedworth, Coventry and Rugby.	X		
Other Suggestions			**Evidence**

RL6: Should priority be given to the extension of existing RLS where there is spare capacity available at the existing rail freight terminal?

Alternatively, where sites cannot be extended should satellite sites be considered? Satellite sites would utilise the rail freight infrastructure at an existing RLS. A pre-requisite for a satellite site would be the availability of spare capacity at the existing rail terminal.

Comments:
Rapid reaction indicates the use of satellites

Strategic Centres

SC1: Do you have any comments on the levels of provision, see page 45?

Comments:

SC2: Do you have any comments on the assumptions included in the Regional Centres Study?

Comments:

SC3: Do you have any comments on the suggested thresholds for referral to the RPB, see page 46?

Comments:

SC4: Should an upper limit for development in non-strategic centres be introduced in order to protect the role of the strategic centres?

Yes X No ■ Comment ■

SC5: Do you think that WMRSS policies should give priority to centres where people currently travel away for retail and leisure?

Yes X No ■ Comment ■

SC6: Do you think that WMRSS policy should support the regeneration approach, see page 47?

Yes X No ■ Comment X
The policy should go further - bring town and city centres into the mix

SC7: Do you think that WMRSS policy should support the market led/opportunity approach, see page 47?

Yes ■ No X Comment X
This would discriminate against small businesses. Small businesses should be seen as the way to rejuvenate and protect town centres and local communities.

Offices

O1: Do you have any comments on Table Four that will help the RPB to develop an office provision policy, see page 50?

Yes ■ No Comment ■

O2: Do you think the Centres Study has identified the right levels of additional office floorspace/development?

Yes ■ No ■ Comment X
Don't know. Is your crystal ball better than ours? Isn't this micro-management going too far?

O3: If no, do you have any robust evidence that can support your comment and the development of the Preferred Option?

Comments:

O4: Do you think the sequential approach to out-of-centre office development is the best approach?

Yes ■ No ■ Comment ■

O5: Do you think WMRSS policy should set out maximum percentages for out-of-centre office development?

Yes ■ No X Comment ■

O6: If yes, what percentage would you suggest?

Comments:

O7: Do you think that WMRSS policy should set out criteria for out-of-centre office development?

Yes X No ■ Comment X
Guidelines are always helpful, diktats - definitely not!

O8: If yes, what criteria would you suggest?

Comments:

O9: Do you have any additional comments about out-of-centre office development?

Comments:

Regional Casinos

RC1: Should the guidance in the WMRSS for where regional and large casinos go be based on assessing the impact on Urban Renaissance?

Yes ■ **No** ■ **Comment** X
The FSB takes a neutral position on Casinos and therefore we make no comment in this section.

RC2: Should WMRSS policy state that large casinos should in the first instance be in town and city centres?

Yes ■ **No** ■ **Comment** ■

RC3: Should the guidance in the WMRSS on where regional and large casinos go be based on assessing the impact on Urban Renaissance, RC1, however add more specific local criteria both in terms of location and potential benefits?

Yes ■ **No** ■ **Comment** ■

RC4: If yes, what criteria would you suggest?

Yes ■ **No** ■ **Comment** ■

Questionnaire on: Spatial Options – Waste

Please note: Complete the "Yes" "No" "Comment" boxes with an "X"

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Managing Your Own Waste

W1: Should the WMRSS set out the principle that each Waste Planning Authority, or sub region, should manage waste; in accordance with the Waste Hierarchy, and; allocate enough land in its Local Development Documents to manage an equivalent tonnage of waste to that arising within its boundary, taking into account the appropriate growth in waste arising from the formation of new households and the diversion of Commercial and Industrial Waste from landfill?

Yes X **No** ■ **Comment** X

Small businesses are at the heart of communities, whether rural or urban, and as such are keen to maintain the quality of the environment in which they operate. Also, in order to keep costs as low as possible, they automatically work to the environmental ideal of 'Reduce, reuse and recycle'.

However, FSB members report difficulties in maintaining this stance due to the different ways in which domestic and commercial waste are treated. We have an example of a retailer operating more than one outlet who encounters very restrictive regulation on how he handles cardboard waste and is thus actively discouraged from recycling.

The trend is for more businesses to work from home, so these businesses find they can take advantage of local authority recycling schemes in ways that their colleagues operating from commercial premises cannot.

We would like to see more local facility provision for recycling of items such as paper, cardboard, bottles & jars, cans, wood and ink cartridges that can be accessed by small businesses as well as domestic council tax payers.

W2: If no, suggest an alternative approach;

Suggestions

W3: Should the basis on which WPAs identify sites be based on safeguarding and expanding suitable sites with an existing waste management use? However they need to be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections.

Yes X No ■ Comment ■

W4: Should the basis on which WPAs identify new sites be based on the following criteria;

Good accessibility from existing urban areas or major planned development; and good transport connections including, where possible, rail or water, and compatible land uses, namely,

- Active mineral working sites; or
- Previous or existing industrial land use; or
- Contaminated or derelict land; or
- Land within or adjoining a sewage treatment works; or
- Redundant farm buildings and their curtilage; and
- Be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections?

Yes X No ■ Comment X
We are concerned at the inclusion of industrial land and redundant farm buildings in this list, because of future loss of potential employment land.

W5: If no, suggest alternative criteria below;

Suggestions
Depends of type of waste facility, for instance composting, could be Greenfield near to farm land or a farm that has the necessary infrastructure.

W6: Should waste management facilities be permitted on open land, including land within the
Green Belt, where it is

- **close to the communities producing the waste; and**
- **where there are no alternative sites; and**
- **where it would not harm the openess of land or the objectives of Green Belt**

Yes X No ■ Comment X
We would agree with this. An FSB member is looking for sites to set up a 'Soils Hospital'. A minimum of 3 acres is required, where contaminated land can be mixed with water, lime etc to 'cure' it from the contamination, It is a slow process – it needs to be turned and mixed, and reach high enough temperatures make the soil safe. Helpful bugs and bacteria can also be introduced which will 'eat' some contaminants. However, there are not many suitable sites available.

Municipal Waste

W7: Do you have any comments on the tables on pages 59-60?

Comments:

Commercial and Industrial Waste

W8: Should the WMRSS policy for Commercial and Industrial Waste be based on:

Criteria	Yes	No	Comment
a-low) the current levels of diversion of Commercial and Industrial Waste arisings from landfill in Waste Strategy 2000?			
b-medium) policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy?			
c-high) policies that reflects a higher rate of diversion, twice that of the draft Revisions to England's Waste Strategy, to anticipate a higher level of diversion arising from the increase in Landfill Tax and producer responsibility obligations?	X		

The table below illustrates W8, (to 2025 to reflect the England's Waste Strategy 2000).

Landfilling as a % of total and Industrial waste	2002	2010	2015	2020	2025
a-low)	42%	41%	40%	39%	39%
b-medium)	42%	37%	36%	35%	35%
c-high)	42%	35%	30%	25%	25%

Hazardous Waste

W9: Should the WMRSS include a policy which requires Waste Development Frameworks to safeguard existing sites for the treatment and management of Hazardous Waste?

Yes X No ■ Comment ■

W10: If yes, should WMRSS policy state that Waste Development Frameworks in the Major Urban Areas give specific priority to identifying new sites for facilities, to store, treat, and remediate Hazardous Waste, including contaminated soils and demolition waste?

Yes X No ■ Comment X
There are not enough Hazardous Waste sites (nearest one is Risley, Manchester) and this has led to huge increases in prices and also transportation costs.

W11: Should WMRSS policy state that Waste Development Frameworks for the non MUAs, identify new sites for the disposal of Hazardous Waste, including where necessary encouraging the creation of protective cells in landfills for stable Hazardous Waste?

Yes X No ■ Comment X
We would like to see more ready-prepared sites for the use of business. At present it is up to the business to identify a possible site and prepare it for waste disposal, such as clay-lining. We feel this should be done by the Region, rather than by the business, to ensure consistent and high standards for preparation.

Construction and Demolition Waste

W12: Should the WMRSS encourage greater recycling of Construction & Demolition Waste through:
a) maximising 'on-site' recycling; and
b) promoting 'urban quarries' in the MUAs where material from a variety of sites can be recycled to a high standard?

Yes X No ■ Comment X
a) 'On-site' recycling is possible, but only when sufficient space is available. This was done with the Cape Hill Brewery demolition, where storage of the various grades of crushed brick and other materials was possible. Would prefer to see encouragement for this activity, rather than compulsion, to retain flexibility. It should be noted that recycling centres are still required, because not all sites have the option to recycle 'on-site'. b) Old quarries surely are ideal for this.

Landfill

W13: Should the WMRSS policy state that Waste Development Frameworks restrict the granting of planning permission for new sites for landfill to proposals which are necessary to restore despoiled or degraded land, including mineral workings, or which are otherwise necessary to meet specific local circumstances?

Yes ■ No X Comment ■

W14: Should the WMRSS only support the allocation of new landfill sites in Waste Development Frameworks (WDFs) where they are supported by evidence of the depletion of existing landfill capacity, and a shortage of capacity in the plan period following a study of the existing sites with planning permission for landfill, but which do not have a waste management licence or permit from the Environment Agency?

Yes ■ No X Comment X
Every hole in the ground already has to be registered. This is correct as there needs to be some control. But a monopoly situation should not be allowed to develop, which is what has happened following the introduction of the new waste regulations.

Agricultural Waste

W15: Should the WMRSS include a policy which requires relevant WDFs outside the MUAs to identify sites for the treatment and management of Agricultural Waste based on the premise that:

- agricultural undertakings adopt sustainable waste management practices with regard to waste arisings and best agricultural practice in relation to any wastes treated or disposed of on a farm: and
- opportunities for necessary additional sustainable waste management capacity in rural areas for waste recovery or recycling should be based on:
    - effective protection of amenity and the environment; and
    - the proposed activity is appropriate to the area proposed?

Yes ■ No ■ Comment X
This is taking things further than the waste industry is already doing.

Managing Waste in New Development

W16: Should all Local Planning Authorities in the Region include a requirement in their local validation checklist for all Full or Reserved Matters planning applications for developments in excess of 10 dwellings or 1,000 sq. metres, or outline planning applications for sites in excess of 0.4 hectares of development to include a Site Waste Management Plan, without which they will not be registered as valid?

Yes X No ■ Comment ■

W17: Should all Waste Planning Authorities in the Region include a requirement in their local validation checklist for all Full or Reserved Matters planning applications for waste management facilities to include information on annual throughput capacity in tonnages/ litres/ cubic metres (depending on the type of waste/facility), without which they will not be registered as valid.

Yes X No ■ Comment X
Needs to be flexible to allow for changes.

W18: Should the WMRSS require all LDDs to have policies which require provision to be made in the design of all new residential and in commercial and industrial development for the segregated storage of waste and for on-site waste management to be part of the 'Design and Access Statements'?

Yes X No ■ Comment ■

Questionnaire on: Spatial Options – Transport and Accessibility

Please note: Complete the "Yes" "No" "Comment" boxes with an "X"

YOUR DETAILS	
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If you need more space, please attach extra sheets and refer to the question numbers.

Strategic Park & Ride

SPR1: Do you agree that the criteria on page 73 are the right criteria?

Yes X No ■ Comment X
Generally.

SPR2: If not what else should be considered?

Suggested Criteria:
Opening hours should be long enough to accommodate business requirements. Excellent security for users and their vehicles should also be a key criterion. Buses used should be able to accommodate luggage and shopping requirements; also need to be able to handle the needs of parents with small children and buggies.

SPR3: Do you agree that Strategic Park and Ride locations may be categorised as "Edge of Major Urban Area" and "External Town"?

Yes X No ■ Comment ■

SPR4: Are the broad locations identified on page 74 the right ones, or should others be considered?

Yes ■ No ■ Comment X
Should also consider Wolverhampton (which is mentioned in WMRSS Policy T6B), Burton upon Trent and Stourbridge. Wolverhampton and Worcester Parkway are not mentioned in the location lists on p74, but are both mentioned in T6B.

SPR5: Do you agree that the "Target Destinations" within the Region are the Centres identified in WMRSS Policy PA11?

Yes X No ■ Comment ■

SPR6: Is London the only "Target Destination" outside the Region that should be accessed by Strategic Park and Ride or are there others?

Yes ■ No ■ Comment X
Manchester, both the City and the airport, is a particularly relevant Target Destination, particularly for the northern part of the Region. Also Sheffield and Leeds. Others are Doncaster, Luton and East Midlands Airports, and until the extension to Birmingham International Airport is built, Heathrow Airport should also be included.

SPR7: Are there opportunities for Strategic Park and Ride in the West Midlands to provide access to "Target Destinations" outside of the Region?

Yes ■ No ■ Comment ■

SPR 8: Which of the three approaches (Criteria Based, Location or Target Destinations) do you feel would best provide the guidance needed and why?

Comments:

Car parking Standards

PS1: Does the West Midlands need to have regionally specific parking standards that are different to those set out in the national guidelines?

Yes ■ No X Comment X

Small businesses are often more dependant on parking provision than big business, especially in rural areas where public transport is scarce. Local authorities (LA's) are often using parking as a simple revenue stream.

Restrictive parking standards must not be imposed unless there are sensible and adequate Park & Ride schemes and other alternative public transport, to enable people to get into centres.

FSB parking strategy is:

- Adequate parking provision, especially for areas where there is little choice but to drive due to inadequate public transport.
- The promotion of a 'timed disc system' for delivery and service vehicles.
- Greater parking provision of parking by public transport.

Restrictive Parking provision will have a deterrent effect on visitors to an area and should be avoided

If "Yes" please answer Questions PS2-PS12, if "No" please move to the 'Road User Charging' section and questions on page 78.

PS2: Should regional parking standards be identified for land uses not included in national guidelines (PPG13: Transport) and if so which?

Yes ■ No X If Yes, Please specify ■

PS3: Should some parking standards only be defined in Local Development Frameworks, and if so which?

Yes ■ No X If Yes, Please specify ■

PS4: Do you agree with these suggested criteria on page 76?

Yes X No ■ Comment X

Broadly agree. But stress need for adequate provision. Other transport means are nowhere near as efficient for place to place transport.

PS5: Should any other criteria be considered?

Comments:

PS6: Do you agree with the principle of dividing the Region into settlement types?

Yes X No ■ Comment X
Agree to a point, as this principle recognises that a 'one-size-fits-all' approach is not always correct.

PS7: Do you agree with the definitions of the settlement types on page 76?

Yes ■ No X Comment X
There seems to be a gap between small settlements and large urban areas. Many small businesses are located in the medium sized areas.

PS8: Do you agree with the 50% and 20% reductions?

Yes ■ No X Comment X
Any reduction in available parking has a greater impact on small businesses and will thus accelerate the trend towards the homogenisation of the High Street by the large chain stores.

PS9: Do you agree with the Local Accessibility approach on page 77?

Yes ■ No X Comment X
This approach seems to be concerned only with the travel arrangements for customers and staff working normal office hours. It does not take into account businesses who need to have deliveries during the working day, or those of the business owner, or staff who work outside 'normal' office hours e.g. Restaurants. Again, any reduction in available parking has a greater impact on small businesses and undermines their flexibility and ability to compete with larger businesses.

PS10: Do you agree with the 50% and 20% reductions?

Yes ■ No X Comment ■

PS11: Do you agree with this Site Specific Accessibility approach on page 77?

Yes ■ No X Comment X
This approach seems to be overly complicated and difficult to assess properly. The idea that a particular site is deemed to always have excellent journey times can quickly change due to external factors, such as major accidents, road-works or events (e.g. Crufts at the NEC). Most sites can be easy to access at particular times of the day but really difficult at others. Again, we feel that any approach which is used to reduce available parking will have a greater impact on small businesses and their needs must be recognised.

PS12: Do you agree that site specific considerations should result in a 50% or 20% reduction in provision?

Yes ■ No X Comment ■

Road User Charging

RUC1: Do you agree that the existing regional policy for Demand Management should remain the same until more is known of the outcome of the TIF work and the wider implications?

Yes X No ■ Comment X
We feel the existing regional policy for Demand Management should remain the same, apart from T8C, until more is known of the outcome of the TIF work.

RUC2: Should the existing regional policy be changed to remove the reference to local charging schemes in the more congested city centres, such as Birmingham and include reference to the TIF and potential national scheme?

Yes X No ■ Comment X
Road and Congestion Charging should be shelved. A total re-think is required. The UK has a small percentage of major road miles per journey, per population, per any comparator than most of the rest of EU.

Role of Airports

A1: Do you have any comments on the suggested policy revision outlined on page 81?

Yes X No ■ Comment X
The FSB supports the revised policy outlined on p81. Improvements to Birmingham International Airport and the road and rail links around the airport must be made a priority to ensure the West Midlands does not lose out to other regions with inward investment or improving global links. These are crucial if Birmingham International Airport is to gain its second runway and so cope with the additional passenger numbers envisaged. We regret the Major Defence Contract was not awarded to RAF Cosford.

A2: What surface access modal split targets should be included in the WMRSS?

Yes ■ No ■ Comment X
There should not be any changes that decrease access by road to Birmingham International Airports. It is important that the needs of suppliers and employees, as well as passengers, are considered. All access improvements, especially M42 and A45 (to the airport) need to be implemented as a matter or urgency.

A3: Do you agree with the roles described on page 82 for each airport?

Yes X No ■ Comment ■

A4: Is the requirement for an 'Airport Development Document' an appropriate policy to include in the WMRSS?

Yes X No ■ Comment ■

A5: If an 'Airport Development Document' policy is not supported, then how else can the WMRSS manage the wider impacts of airport development?

Comments:

A6: Should the WMRSS include policies to deal with airport related cross-boundary planning issues?

Yes X No ■ Comment X
A large majority of FSB members in the West Midlands serve local and regional markets and over a third state they depend on UK-wide markets for over half of their annual sales. The notable distinction in the West Midlands is that they are less dependent on local and regional markets than other parts of the UK[5]. The West Midlands is unique amongst the English regions in that it does not have a coastline – therefore the ability to access markets and customers outside the region easily is important in maintaining the region's competitiveness.

[5] FSB Lifting the Barriers to Growth Survey 2006