



Federation of Small Businesses

The UK's Leading Business Organisation

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

5th August 2009

Dear Sir/Madam

West Midlands Regional Spatial Strategy (WMRSS) Phase Three Revision – Options Consultation

The Federation of Small Businesses (FSB) welcomes the opportunity to respond to the above consultation on behalf of its 18,000 members in the West Midlands, in an area co-terminus with Government Office for the West Midlands. Our members are drawn from small and micro businesses across all sectors. They have been contacted through a variety of methods, including email and personal contact.

We trust that you will find our comments in the attached document helpful and that they will be taken into consideration. The FSB is willing for this submission to be placed in the public domain.

If you wish to discuss any of our proposals in more detail, we will of course be happy to do so.

Yours faithfully

David Caro

Chairman, West Midlands Policy Unit
Federation of Small Businesses, West Midlands



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The UK's Leading Business Organisation

Response from the
Federation of Small Businesses (FSB) West Midlands
to the
**West Midlands Regional Spatial Strategy (WMRSS)
Phase Three Revision – Options Consultation
June – August 2009**

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Introduction

The Federation of Small Businesses (FSB) is the UK's largest lobbying organisation representing, promoting and protecting the interests of the self-employed and owners of small businesses. Founded in 1974, the FSB has over 215,000 members across all industry trades and sectors within the UK. It lobbies at many levels of government, including local, regional, national and European.

The FSB in the West Midlands covers an area co-terminus with the Government Office of the West Midlands. The responses in this submission concentrate on the issues affecting FSB members in the West Midlands' region.

Small Business Contribution to the Economy:

Facts and figures¹:

- There are over 4.7 million small businesses in the UK, providing over 13.5 million jobs.
- Over 97% of UK firms employ less than 20 people
- 99.3% of UK firms employ less than 50 people
- Small firms employ 59% of the private sector workforce
- Small businesses contribute 51.5% of UK GDP
- 60% of all commercial innovations come from small businesses
- In each General Election constituency there are over 6,000 business owners eligible to vote
- Between 1996 and 2000, 1.5 million jobs were lost in established businesses but SMEs created 2 million new jobs in the same period
- Marks and Spencer, Rolls Royce, Sage, Boots and Virgin are all small business success stories
- Combined turnover of FSB members is £10 billion employing over 1.25 million people

In the West Midlands

The FSB in the West Midlands has 18,016¹ members employing over 200,000 people².

West Midlands' nominal (money) GVA in 2006 was estimated to be £89bn (£88,997m), a 5% increase on 2005. Between 1996 and 2006 the regional economy grew at an average annual rate of 4.7%. The regional economy is 7.9% of the UK total economic output.³

As at March 2008 there were 178,680 enterprises in the region, of which 175,155 (98%) had between 0 and 49 employees. An enterprise is the smallest combination of legal units that is an organizational unit producing goods or services, which benefits from a certain degree of autonomy in decision-making, especially for the allocation of its current

¹ As at May 2009

² Extrapolated from FSB Lifting the Barriers to Growth Surveys

³ Figures obtained from the West Midlands Regional Observatory

resources. An enterprise carries out one or more activities at one or more locations. An enterprise may be a sole legal unit.³

General Comments

Small Businesses in the West Midlands are suffering disproportionately from the current recession compared to other regions of the United Kingdom. The West Midlands' regional strategies must be flexible enough to take account of changes in the trading environment – whether deteriorating or improving.

There is also considerable feeling that the lack of an integrated Transport network and years of under-investment in the whole region's roads and rail networks is now causing significant difficulties for the sustainability and growth of the small business sector in the West Midlands not only in the more congested conurbation, but also the rural transport links.

In many ways the consultation paper is a disappointing document. It covers the period to 2026, seventeen years hence, yet lacks vision. Nowhere is this more apparent than in the *Rural Renaissance: Critical Rural Services and Culture, Sport and Tourism* sections. These two topics are linked by tourism, already an important component of the region's economy and one that is likely to play an even more important part in the future of the region's economy.

Our rural businesses have the potential to play a huge role in the UK economy in the 21st century. A role that can help preserve our precious rural environment, sustain our rural communities and address the long term challenges that have plagued our countryside for so long. Our first priority must be to businesses such as rural post offices, village shops and pubs to ensure that they not only survive but also continue to act as the heart of rural village life for generations to come.

Then we need to turn to the future and ensure that we can deliver a framework that will allow our rural economies to flourish for the benefit of business, the environment and communities alike.

To do this we need to address the fiscal framework our rural businesses operate within. We also need to unlock the huge potential that our tourism industry has to offer but more than anything, we need a planning system that reflects the potential the rural economy has to offer.

Given the current economic climate and future challenges for the economic well-being of our region, it is disappointing that only six weeks consultation has been allocated for the preparation and submission of responses.

Critical Rural Services

There seems to be an almost total lack of understanding of the importance of the rural areas of the region especially the counties of Herefordshire and Shropshire and southern Worcestershire. These areas make a substantial contribution to the region's economy and have the potential to grow faster than the rest of the region. Policies should be developed to maximise this potential to benefit the West Midlands region as a whole.

Rural areas contain a diverse range of businesses - not only agriculture. The latter, whilst only employing 2.6% of the rural work force, contributes some 10% of its GVA⁴. Farmers are the custodians of the countryside and the countryside is at the heart of much tourism across the region. What we see, admire and wish to visit is created and for the most part, maintained by the farming community. And it should be remembered that because farmers employ few workers, they are classified as small or even micro businesses.

Rural areas have a higher proportion of small businesses than the major urban areas. Herefordshire has the highest number of small businesses per capita of any county in England. Because many small businesses are sole employers or family businesses and employ few, if any, workers, it is unclear if the contribution of these businesses is included in calculating the GVA per employee. Apparently the English rural economy has the potential of creating between £236bn and £347bn per annum⁵. A frequently expressed concern is that in rural areas, GVA per employee is considerably below the regional average which in turn is well below the national average. However, what is forgotten is that for many residents, including business owners, it is not just about earning power but maintaining a way of life.

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

Please tick one box Yes No

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

Rural services are not just 'important' or 'critical'. All services are 'fundamental' to the survival of rural economies and all might be classified as 'critical'. The list, which is not exhaustive, includes post offices, public houses, local village stores and garages, emergency, medical and dental services, schools and libraries, and transport services. The requirement is for sustainable communities however small.

The Taylor Review of Rural Affordable Housing explained how the definition of rural

⁴ Newcastle University's Centre for Rural Economy

⁵ Government's Rural Advocate

public services can help guide decision-making on rural affordable housing while the Commission for Rural Communities has analysed the role, value and definition of rural public services.

We support the West Midlands Business Council view that rural public services should not be seen by planners and other decision makers as an optional extra for regional planning policy. Without good quality rural public services the rural economy would be unsustainable leading to serious imbalances in the regional economy as well as rising levels of socio-economic deprivation in rural communities.

Key services/policies that support the rural economy include:

1 - The Rural Post Office Network

Sole Post Offices⁶ in villages provide a vital service for small businesses yet urgent action is needed to support the wider rural post office network.

Post Offices provide an essential service to the local community by contributing to the local economy and sustaining other businesses. Rural Post Offices and other businesses such as local shops rely on each other to attract footfall. Thus, there is interdependence between these vital services that needs to be maintained if we are to sustain our rural communities.

More than half of the rural Post Offices have fewer than 500 customers each week and more than 80 per cent of the rural network is unprofitable⁷. Loss-making rural Post Offices have generally been sustained through profit making additional businesses such as village shops, yet the number of village shops is also in decline. The Commission for Rural Communities estimates that the village shop network is losing between 300-500 shops per year.

We need to find a sustainable solution to keep the vital rural Post Office network and rural communities alive and would like to see the Post Office develop a Post Bank to provide the following key services:

- The FSB is calling for the Post Office to develop retail banking facilities linked to the big four banks as well as providing access to business banking services. Bank branches have long disappeared from our villages and rural towns and the Post Bank initiative would provide a vital community service as well as supporting local businesses and maintaining our rural Post Office network.
- The FSB is calling for a quicker method of paying in cash/cheques at the Post Office than the current way of queuing up at the counter. Most banks have quick drop facilities, but this does not yet exist at the Post Office. To make the post office more business friendly, the FSB is calling for services to businesses to be

⁶ By sole post office we mean a single post office in a rural area with a population of below 3,000 and on the local authority's rural settlement list

⁷ The Post Office Network

improved. This can take the form of specially trained staff or even dedicated counters at busy times.

- The Post Bank should be no less than a fully fledged retail bank offering a full range of financial services including cost-free cash machine withdrawals. A Post Bank offers the chance to secure the future of our rural Post Office network and the businesses and communities that so depend on them.

2 - Rural Recession Rate Relief Scheme (England)

The failure of a vital business in a small village can devastate a local community and the FSB believes urgent action is needed to give relief to those businesses that are so often at the heart of village life.

Currently there is 50 per cent mandatory rural rate relief* for some village businesses, however local authorities have the discretion to grant up to 100 per cent relief. Still, due to local government financial constraints, many Local Authorities fail to offer significant relief above the mandatory 50 per cent. Our national recommendations include:

- The FSB would like to see the Non-Domestic Rates pool fund, to which local authorities contribute, topped up by the Treasury. This will enable local authorities to grant 100 per cent rural rate relief to the vital services and businesses which are at the heart of rural community life. We propose these changes to last for 12 months with a mandatory review to if see a further time extension, based on economic circumstances, is necessary at the end of this period.
- The FSB proposes that, following the topping up of pool funds by the Treasury, there should be a mandatory duty for local authorities to extend 100 per cent rate relief for the businesses for a period of 12 months.

*To qualify for rural rate relief, small businesses need to be based in rural areas with a population below 3,000 people and need to be within a rural settlement area. Currently sole post offices, general stores and food shops⁸ with a rateable value of up to £7,000 and sole pubs and petrol stations with a rateable value of up to £10,500 qualify for 50 per cent mandatory rate relief.

3 - Broadband

The Government recently announced a universal service obligation for 2mbps in relation to broadband. They announced that all areas in Britain would have access to broadband by 2012 which is good news for rural areas but the FSB voiced concern that 2mbps is not a fast enough service for running a rural business.

Research by the FSB shows that a third of small businesses already have 2mbps

⁸ By sole post office/pub/shop/petrol station we mean a single outlet in a rural area with population of below 3,000 and on the local authority's rural settlement list

broadband speed, yet struggle to do core, day-to-day business activities⁹. More than half of small businesses rely on the internet for up to 50 per cent of their annual turnover, yet simple tasks such as emailing, marketing, buying and selling, are time-consuming because their broadband speeds are letting them down.

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

Please tick one box **Yes** No

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

A well planned and well funded transport infrastructure is the key to ensuring the success of our rural communities and in particular our tourism sector.

The FSB would like to see a rail and road infrastructure that is fit for 21st century Britain and that gives us the regional and national network that will encourage rather than hinder tourism across England.

Attention should also be given to the role buses and coaches play in public transport journeys and we urge local authorities to reconsider their attitudes to coach and car parking services. Rather than a means of raising short-term revenue, parking provision has a crucial role to play in making our rural towns more accessible and thus encouraging local tourism.

Unless this issue is addressed, smaller communities will wither and die and, with them, small businesses will follow. Our region’s position at the heart of the UK means that businesses of all sizes should enjoy a geographical advantage but transport congestion and poor transport infrastructure continues to add to the already difficult trading environment of current times. Our own studies have shown that nearly 10% of our members lose over £5,000 in revenue a year and 15% report losing over 100 person hours a year¹⁰.

The FSB has worked closely with the West Midlands Business Council and the West Midlands Business Transport Group in lobbying for an effective transport infrastructure that is integrated across all transport modes and have called for a fundamental review of the transport requirements across the whole region.

Survey work by the West Midlands Business Council has demonstrated that current rural transport integration is ineffective in the West Midlands region and if not addressed, that these problems would be aggravated if the significant house building programme planned for rural areas take place.

⁹ FSB Putting the economy back on track survey

¹⁰ FSB Lifting the Barriers to Growth surveys

Bus Services

- Bus services are unreliable and often are not linked to other transport modes.
- They run at unsuitable times for workers, and rarely operate in late evening. This is a particular problem for the tourism and hospitality sectors.
- Bus deregulation may have aggravated this problem.

Park & Ride

- Park and Ride parks should provide a valuable contribution to alleviating road congestion but in practice this is not the case. Issues surrounding driver and vehicle security reduce usage of existing sites and subsequently do not help with congestion as much as intended.
- Opening hours do not always operate with workers and small business owners in mind. Coupled with bus timetable problems outlined above, this adds to the difficulties for attracting staff and customers to their businesses. It is another hindrance in developing a joined up transport network for access to rural areas.

Rail Services

- Rail services have recently improved or will be improved.
- The FSB has welcomed the opening of a direct link from Shrewsbury to London.
- The track between Worcester and Oxford will be fully dual-tracked by the end of 2010, which we also welcome.
- There is a need to improve the pace of work to enable the transport of freight by upgrading the Birmingham/Felixstowe and Birmingham/Southampton routes, especially as a potential rise in business growth may be a consequence of the proposed house building programme.
- An improvement of rail services between Nuneaton and Coventry is essential with through services into the East Midlands.
- Rail services in Staffordshire have been severely curtailed – with cuts in local services such as the Stoke to Nottingham service, which disadvantages the northern rural parts of the region.
- Links to regional centres are critical in driving forward economic regeneration and with the planned increased housing development demand is likely to increase, reversing past limited demand, which may have also been as a result of the unreliability of and sudden changes to timetables.
- If the Government proceeds with some form of road charging programme either regionally or nationally, an increase in rail passengers must be anticipated.

Roads

- Road congestion is a major issue for business, leading to unnecessary additional costs.¹¹
- It is also a problem for public sector services such as access to ambulance and fire services, police response, specialist transport, etc which has implications for

¹¹ FSB Survey – Putting the Economy back on Track 2008 – Transport, Environment and ICT - <http://www.fsb.org.uk/default.aspx?id=2&loc=policy>

businesses and individuals.

- Several business parks and industrial estates are based around B roads, but despite their strategic importance, B roads are not as well maintained as A roads hampering regional business traffic flows.
- It is vital to increase road capacity on the road network at some key junctions and along some link roads such as the M40 Junction 15 (Longbridge), M1 Junction 19 (the Catthorpe junction of the M1, M6 and A14), A46/A45 Junction (Tollbar) and M6 Junction 1 to Junction 4. The resulting congestion inhibits cross regional transport for many small businesses.
- Both major grade and cross county roads are inadequate. Examples include:
 - A49 through Herefordshire and Shropshire
 - A44 throughout Worcestershire and Herefordshire
 - A422 between Worcester and Alcester
 - A4133 and A443 from Droitwich Spa and Tenbury Wells
 - A5 in Staffordshire – especially used by freight traffic travelling to the M1 through to the east coast ports
 - A438 in Shropshire – this is a key link road between Swansea and Manchester; the congestion experienced here damages the quality of life for the residents of Shropshire and causes problems for commuters and businesses travelling from outside the West Midlands

Waterways

- Lack of river crossings across the River Severn, particularly in Worcestershire
- Limited crossings from Herefordshire into Wales over the River Wye. Wales is a key trading partner for many businesses in Herefordshire and Shropshire

Housing Development

- In keeping with other parts of the West Midlands business community, we are also concerned that without addressing the additional transport needs that will arise from the scale of the planned housing developments as well as sustaining rural communities, the impact of transport difficulties for the regional economy would only deteriorate. The West Midlands Regional Spatial Strategy needs to factor in transport improvements to cope with the scale of increase in house building that is proposed.

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

Please tick one box Yes No

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

Our rural businesses operate within the constraints of a planning system that has been

largely unchanged since the Town and Country Planning Act of 1947, which has a focus on protecting the countryside.

Sustainable development and environmental stewardship are essential to a successful modern countryside yet the role of a vibrant rural economy in creating successful rural communities has been grossly undervalued by the current planning system.

Small settlements need continual renewal and new incomers provide vitality. Therefore it is important that new development should not be limited to housing (social, affordable and private), but include a variety of new small businesses.

A vibrant and diversified rural business community must be encouraged. A clearer investment in these businesses will also ensure the well being of the countryside. Local planning authorities still use a range of closely defined uses for land and existing buildings that continue to focus on traditional rural economic activity such as farming. This leads to an out of date perception of modern rural economies.

One example of the above is that there is a real need for a more flexible approach to the re-use and conversion of existing buildings. This development is hampered by the fact that many farm and agricultural buildings are located in countryside that has Greenfield status and are governed by overly restricted rules in relation to the re-use of existing buildings and farm diversification in particular.

The FSB would like to see the West Midlands Regional Spatial Strategy:

- Recognise and commit to the crucial role that rural economies have to play in sustaining rural communities
- Provide a sensible joined up approach to planning to remove the assumption that planning applications are ‘bad’ per se and will damage the sustainability of rural areas to enable a real, living, working countryside to operate.
- Make it clear that our countryside is open for business by ensuring the planning system does not unnecessarily restrict economic development of our rural towns and villages.

Including these recommendations in the West Midlands Regional Spatial Strategy would make a significant contribution to growing an effective service base therefore helping to reverse the cycle of decline of many of the rural communities within the region.

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

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

Please provide reasons for your preference

Rural settlements grow organically; that is, they grow through the efforts of the

community and not in a haphazard way. As in answer to the previous question it is the diversity of a community that keeps settlements alive. This diversity extends to the business community, the wide variety of firms found in rural areas ranging from farming to distribution, research, high tech, manufacturing, food production, financial services and tourism.

Their development is based around the local economic activities and diversity and is not simply about livestock and crops. Farming is not the main source of local employment – it only accounts for 2.6 per cent.¹² However, 80 per cent of rural employment is in activities that are often assumed to be urban activities, such as distribution and retailing, financial and business services and even manufacturing.

For the rural economy to be sustainable, the planning options described in the consultation document must reflect economic and community reality. Anything less would be impractical to implement and would not achieve the aims of the Regional Spatial Strategy and the Regional Economic Strategy to have a balanced regional economy.

That said, this does not mean that environmental issues are not of concern to small businesses. On the contrary, in the FSB's Survey on Social and Environmental Responsibility published December 2007¹³, 85 per cent of members cited personal views and beliefs for undertaking environmentally activities within their businesses and 76 per cent said they felt it was good business practice. Over half were committed to reducing the environmental impact of their businesses and 40 per cent had implemented an environmental policy.

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

80 per cent of the West Midlands region is rural. Therefore, provision of rural public services for this part of the region is essential. Initiatives that have been successful include:

- The Shropshire Pathfinder scheme
- The Rural Regeneration Zone of covering parts of Shropshire, Herefordshire and Worcestershire

These examples should be rolled out across all rural parts of the region.

Other initiatives could include:

- One Stop Shop for Business Services
- The fulfilling of public procurement contracts by local rural businesses
- Locating skills training in rural communities

¹² Newcastle University's Centre for Rural Economy

¹³ <http://www.fsb.org.uk/policy/assets/CSR%20Dec%202008.pdf>

- One stop village shops supplying a variety of needs including a post office, banking facilities, internet café and facilities for doctors, nurses and healthcare professionals.
- Improved Broadband provision – over 4mbps

Businesses in rural communities are not just the wealth creators for local prosperity and local jobs, fundamental though that is. It is the rural business community and in particular the small business community, that provides the social glue that tie disparate rural communities together.

Therefore any consideration of the work of rural public services delivery must have the role of the rural business community at the forefront of its consideration.

The FSB's Keep Trade Local campaign was launched in March 2008 and has since been taken up by local communities across the UK. Public procurement is one strand of the campaign and our policy document can be viewed at <http://www.fsb.org.uk/keeptradelocal/images/fsbprocurementlores.pdf>

Small and micro rural businesses often provide a very good solution for Local Authorities and other public sector agencies to fulfil their procurement contracts. They have local knowledge and are an excellent vehicle to retaining and growing local prosperity and jobs in rural locations. There is also an expectation that they will not be competitive, however this often untrue; they have lower overheads than their larger competitors, will often provide added-value elements and provide greater flexibility for customers.

We note the recent research undertaken by Harper Adams University College for the West Midlands Business Council, which reveals a skills gap accentuated by demographic changes in rural areas with a proportional increase in the number of older people in rural areas. The experience and skills base of older workers should be seen as a useful resource and given additional support including necessary and appropriate training for this section of the community.

However, with the continuing trend for young people to migrate out of rural areas, there is also a need to retain this group within our region. The location of skills training in rural areas would help to address this.

Underpinning it all is the recurring issue of quality rural transport links. These are detailed in our response to question CRC2.

Gypsies, Travellers and Travelling Showpeople

FSB submits no comment or response in this section.

Gypsies and Travellers

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

Please tick one box Yes No

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

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

Please tick one box Yes No

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

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

Please tick one box Option 1 Option 2 Option 3

Please provide reasons for your preference.

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

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

Please tick one box Yes No

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

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

Please tick one box Yes No

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

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

Please tick one box Yes No

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

Travelling Showpeople

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

Please tick one box Yes No

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

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

Please tick one box Option 1 Option 2

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

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

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

Please provide reasons for your preference.

Culture, Sport and Tourism

Whilst not wishing to diminish the importance of culture and sport, including tourism as an add-on to this topic seems to reflect the region's attitude to this important sector of the economy. For many parts of the region, and in particular the rural areas, tourism is of vital importance.

The consultation document also seems to consider that visitors only come from outside of the region, which is obviously untrue. For places like Malvern, Ledbury and Ludlow most visitors come from within the region. They all spend money and support local economies.

Another aspect that comes across is that the only important assets are those of an international or strategic nature. It implies that outside of London and excluding football grounds, only Manchester and Liverpool have international assets.

Finally, of particular concern is the role and support of tourist information centres (TICs). Amazingly, their provision is a non-statutory duty on local authorities. As a result, in these recessionary times, many Local Authorities are contemplating closing their TICs.

The funding crisis has encouraged a system where entries to guides are governed by organisations and businesses have to pay for an entry. The same applies to the Heart of England Fine Foods (HEFF), which provides an excellent and valuable support service to the food and drink sector of the West Midlands. This has resulted in the Worcestershire guide making no reference to any National Trust property but does include Webbs Garden Centre at Wychbold.

England is blessed with magnificent countryside, museums and theatres that are second to none, yet our tourism sector is let down by the lack of a long term vision to help it achieve its true potential. For too long our tourism businesses have been stifled by the myriad of bodies responsible for marketing tourism in England, by the lack of incentive for local authorities to encourage tourism in their areas and by the lack of an adequate transport infrastructure. This is particularly applicable to the West Midlands.

The FSB would like to see:

- A resolve to the overlap of responsibility for the marketing of tourism between local authorities, Regional Development Agencies (RDAs) and Visit England. This will give small tourism businesses the streamlined, joined-up marketing strategy that is so desperately lacking.
- Increased financial help from central government for local authorities that have the potential to attract significant levels of tourism.

Attracting tourists to an area should mean increased prosperity but for too many local authorities an increase in tourism means that more resources have to be spent on street cleaning, maintaining beauty spots and disposing of rubbish. There is therefore a lack of

incentive for local authorities to develop their tourism business.

To counter the disincentive of higher maintenance costs, local authorities should receive financial help which could take the form of tourism development loans or a cut in business rates for tourism.

Tourism is a key business to the rural economy. People like visiting the beautiful parts of the region. These areas are geared up to supporting tourism through fine family owned hotels, bed and breakfast establishments, caravan parks and leisure activities such as the Ledbury Poetry, Upton Jazz and Bromyard Folk Festivals, the Welland Steam Traction Event and the Big Chill at Eastnor Castle.

In the *Rural Renaissance: Critical Rural Services* section there is little or no mention of tourism. The smallest hamlet can support tourism. This is part of diversification.

However, the poorest aspect of the consultation document is the *Culture, Sport and Tourism* section. It relies heavily on a report commissioned from Burns Owen Partnership Ltd. But the report has so many inaccuracies and poor conclusions that its value has been lost. Some examples include:

- There is no 50 metre swimming pool in the region suitable to host national event. There is, it is in Coventry, which does host national competitions.
- There is no internationally important collection-based museum or art gallery. This is manifestly inaccurate. The world's largest collection of Pre-Raphaelite Art can be found at Birmingham Museum and Art Gallery.
- The Wedgwood Museum in Stoke on Trent is a premium international location for ceramic art, which contradicts the statement in the consultation paper that there is "no asset above sub-regional significance in the north Staffordshire conurbation".
- There is the internationally renowned glass museum at Brierley Hill, subject to the vagaries of Sandwell Council.
- There is no top football ground but omits to make clear that professional football grounds are privately owned and it is up to Premier Clubs to improve them. We accept this means there is not much the Assembly can do. However, it is disconcerting that Villa Park is not acknowledged by the report especially as it is to be used as an Olympic venue and regularly holds national and international football matches.

Other inaccuracies and exclusions include:

- Confusing references to Much Wenlock, the birthplace of the modern Olympics.
- No mention of the connection of Shrewsbury with the birthplace of Charles Darwin, which has seen a revival in tourism to this town due to the Darwin anniversary year in 2009.
- No mention of Lichfield as the historic centre for the birthplace of Samuel Johnson.

- Limited reference to the world famous Mappa Mundi and Chain Library at Hereford Cathedral.
- The correct name for Malvern Theatre is Malvern Theatres.
- No mention of the RHS Spring Garden Show, the second biggest show after Chelsea.
- The Malvern Autumn Show and Countryside Show are the same thing. They should be correctly referred to as the RHS Autumn Garden and Countryside Show.
- Several Cathedrals are classified as Leisure and Tourism – one wonders what the various Bishops would feel about this description
- No mention of the Upton Jazz and Bromyard Folk Festivals

For some reason, the consultants reason that there is a shortage of places of international standard. But other English regions (and excluding football grounds) do not have places of an international standard. Whereas the West Midlands region has the National Exhibition Centre, the National Indoor Arena, the International Conference Centre and the Royal Shakespeare Company at Stratford-upon-Avon (currently being refurbished).

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

Please tick one box

Option 1: Remove the portfolio

Option 2: Update portfolio to include all regionally significant assets

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

Provided it is kept up-to-date it could be a comprehensive and valuable reference to the arts, sport and tourism facilities within the region. Currently, the list is mixed and incomplete. The consultation document refers to around 400 entries which with modern technology should be manageable.

The classifications used and their content are equally misleading. For example, arts could be broken down into music, theatre, ballet, film and other. Heritage should be renamed Historical and Heritage. The content also needs to be refined. Most people would regard Worcester Cathedral as Heritage and not Leisure & Tourism. Also, several major festivals held in rural areas have been ignored.

Updating and maintenance of the list should be given urgent priority. It will enable those charged with running the arts, sport events, festivals, etc and those wishing to participate and visit, to have a clear vision of what is available across the region.

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

Please tick one box Yes No

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

Policy PA10A should protect key strategic cultural assets while enabling development to take place that grow up from these assets. By protecting these assets the tourism, hospitality and transport sectors, and the many jobs that depend on them, can continue and expand.

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

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

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

Social and economic needs are inter-connected – as has been demonstrated so ably by the current economic realities. Customer demand that highlights the gaps and is then addressed, would directly lead to economic benefits.

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

Please tick one box Yes No

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

Statements made in this section of the consultation paper are factually inaccurate and we are very concerned that such inaccuracies have been included in a document that could be negatively read by potential visitors and inward investors to the region. They have been detailed in our comments at the start of this section.

We therefore propose that this analysis is urgently undertaken again in conjunction with the arts, tourism and hospitality sectors so that the significant strengths of the region can be recognised and fully incorporated in the Regional Spatial Strategy.

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

Please tick one box Yes No

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

Leisure facility demand from the 2012 Olympic Games

The decision that Britain will host the Olympic Games and Paralympic Games in 2012 is likely to lead to a greater demand for use of leisure facilities. There will be a clear aim to encourage people to get engaged in sport and improve their health. The demand for leisure facilities will rise and will lead many local authorities across the region to consider locations for new or enhanced facilities to be developed.

We would therefore encourage the West Midlands Regional Assembly to factor in the extension of leisure facilities in the Regional Spatial Strategy.

Further, the announcement that the United States track and field team will base their training camp for the 2012 Games in Birmingham and other teams expressing interest, will boost the regional economy and create jobs. Again, planning will play a part in the development of these activities.

Signage

Brown and white road signs, which are designed to help guide visitors to tourism venues, are widely recognised to be a key factor in driving up tourist numbers.

However, visitors to the West Midlands regularly complain about the poor signage which causes confusion and frustration not only for our tourists but also for businesses and individuals. This gives a very poor impression of the region and does little to encourage repeat visits. Very often it is the small things that can leave the most lasting impressions and given that we already have some of the highest levels of congestions on our region's roads, it seems very foolish not to make sure that our visitors do not encounter even more causes for complaint!

There should be specific and clear guidance in the Regional Spatial Strategy to ensure a consistent approach from local authorities and the relevant parts of the Highways Agency in respect of signage with the overarching aim being to help the visitor economy. Gloucestershire County Council has produced a guide to help businesses and also employs a Divisional Manager who can work through the application process with businesses and organisations.

In addition, and despite the thrust of the Burns Owen Partnership Ltd report that the West Midlands region lacks international standard venues, we do in fact receive visitors from all over the world. It shows remarkable short-sightedness therefore, that despite Birmingham considering itself to be an international city, there are few, if any, multi-lingual signs in the city centre to welcome and assist non-English speaking visitors.

Quality of the Environment

Maintenance of a high quality rural life is dependent on safe and secure communities, with a good range of rural services in place to support a successful and profitable business community. The rural areas of the region, should not be kept 'in aspic' to simply provide recreational spaces for the urban residents of the region to enjoy in their spare time. It should be remembered that the farms and businesses are working environments in the rural areas that need to 'move-with-the-times' as much as their urban counterparts and remain competitive. Therefore we ask that regulations aimed at protecting the countryside should not be applied so rigorously that they unduly disadvantage rural businesses.

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

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

Please tick one box Yes No

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

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

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

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

Please provide reasons for your answer.

We consider both growth led and competitiveness led issues must be considered when developing contaminated land and degraded areas. Despite the request in the formulation of this question, we do not believe that one option can be chosen over another.

Employment land and housing land must be considered together if we are to avoid generating unsustainable sink estates in the future. Land for homes must be linked to land that can provide jobs, which means that in many parts of the West Midlands degraded land must be utilised.

The West Midlands region has one of the worst records of contaminated land due to its industrial legacy. The Regional Economic Strategy has identified a £10 billion productivity gap in the regional economy and bringing degraded land back into use

would significantly address this problem. Local authorities should be encouraged with others to take steps in accordance with a revised Regional Spatial Strategy to bring land back into use that will aid the wider economy.

Neglected land does not just cause environmental blight for local people – it holds back the creation of local jobs and can be a health hazard. The revised West Midlands Regional Spatial Strategy has a key role to play in changing this.

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

Please tick one box Yes No

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

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

Please provide reasons for your answer.

A key feature of the West Midlands is its variety and diversity, which is why a one-size-fits-all approach would not be the way forward. Flexibility and creativity should be adopted within clear action plans for tackling brownfield land remediation. They should incorporate and work with the policies agreed in the WMRSS Phase Two review covering housing and employment land.

Policy QE4 – Greenery, Urban Green Space and Public Spaces

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

Please tick one box Yes No

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

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

Policy QE5 – Protection and Enhancement of the Historic Environment

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

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE5 should not include? If so, please tell us why

you think these issues should be excluded.

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

In the West Midlands, our historic environment includes our industrial heritage and this should be recognised.

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

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

No response

Please tick one box Yes No

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

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

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

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

No response

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

If you disagree, please provide reasons for your answer.

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

No response

Please tick one box Yes No

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

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

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

No response

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

Please provide reasons for your answer.

Policy QE8 – Forestry and Woodlands

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

No response

Please tick one box Yes No

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

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

Protection of Agricultural Land

Planning guidance must state that all types of business can be appropriate for the countryside, subject to a sufficient impact assessment being carried out.

We need to move away from the preconception that rural areas are only suitable for traditional rural business activity, such as farming, to a system where all types of business are deemed suitable for rural areas unless they are evidently unsuitable for local circumstances.

Planning guidance should be more flexible toward the re-use and conversion of existing buildings.

The current planning guidance not only limits the number of available business premises but also hampers businesses that are looking to expand. In particular, the re-use of farm buildings offers a real opportunity to provide new business space in rural areas and offers farmers the chance to diversify their business interests.

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

Please tick one box Yes No

In addition to our comments above, it should be noted that whilst protecting agricultural land is important, not least because of the potential needs of a growing population across the region, the planning regime should be flexible enough to allow for pragmatic solutions to ensure business sustainability. This may be especially important when the core business activity has limited profit or growth opportunities and the secondary business activities are necessary to sustain the core business.

We support the inclusion of encouragement for management of agricultural land for biodiversity as we feel this will help with wider small business opportunities.

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

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

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

.....
Policy QE9 – The Water Environment

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

Please tick one box Yes No

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

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

Water is a national resource and the Regional policies should properly represent this. Although the Regional Spatial Strategy has no remit to consider a national water grid, the transfer of water resource between regions is something that should be investigated, especially as water supply security is likely to become more difficult to maintain as the climate changes. To this end, any planning strategy and forward planning must be undertaken to avoid severe strain on water supply, especially since the Government proposed major house building programmes in this region and at nearby Milton Keynes South Midlands growth area.

We support the recommendations proposed by the West Midlands Business Council, summarised:

- Direct Government intervention, including via the use of building regulations, to help ensure water supply needs are met.

- West Midlands Regional Assembly to work with the Environment Agency to consider the impact of the Milton Keynes South Midlands growth area upon the water supply needs of the West Midlands region.
- Technical work is needed to investigate the viability of effluent water re-use and potential of water transfer from the canal network.

Air Quality

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

Please tick one box Yes No

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

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

Integrated Approach to the Management of Environmental Resources

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

No response

Please tick one box Yes No

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

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

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

No response

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

Please provide reasons for your answer.

Flood Risk

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

Please tick one box Yes No

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

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

During and following the floods of summer 2007, small businesses were amongst the hardest hit groups and a group which, in many cases, took considerable time to recover – some businesses never did recover. The situation demonstrated how planning policy has largely failed in many areas to address the problems of flood risk.

Certain infrastructure facilities such as electricity power stations both within the West Midlands region and neighbouring Gloucestershire were affected by the floods and continuity of operation became very difficult.

The Regional Spatial Strategy should consider allocating additional land to existing sites, as well as providing larger sites for new facilities, so that flood risk security can be designed into the facilities before they are built or – if existing – created. Essential facilities, including water treatment centres and emergency services, should not have to deal with an imminent flood risk of their own at the same time as trying to ensure continuity of supply to the communities they serve.

The 2007 floods also highlighted another area where planning policy had failed to limit the impact of the floods. The problems in transporting flood defence equipment to some localities led to flooding and damage to local communities which, if the equipment had been in place in time, would not have occurred.

This demonstrates a need for depots for flood defence equipment storage to be located throughout areas which are deemed to have a high flood risk. Such areas for depots could be set aside within Local Development Plans under guidance set within the RSS.

The FSB would also ask that other forms of flood defence are considered as new innovative designs are developed, including the recently publicised ‘Self-closing Flood Barriers’ designed in Holland and produced locally in Droitwich, by UK Flood Barriers Ltd. These types of barriers would be a more appropriate proposition for areas where views of riverbanks are an important part of a tourist attraction or where it may be difficult to set up conventional temporary flood defences in time.

There also needs to be careful consideration before any building takes place on flood plains. Therefore we propose the RSS includes a full cost-benefit ratio analysis to ascertain the various factors to building on flood plains that can then be considered in

the further stages of the Phase Three review.

Energy

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

Please tick one box Yes No

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

We support the move to insulate homes and feel that all new builds should be effectively insulated to prevent thermal losses (which are otherwise countered by increased fuel usage). Many small businesses operate from home-based businesses and in the current recession it is likely that many more new businesses will start-up from a spare room or outbuilding in a family home. Measures that facilitate the sustainability of small businesses (and in particular new businesses started in the current economic climate) are to be welcomed, as these are the potential growth businesses of the future. Access to contracts for the fitting of insulation in existing housing stock should be realistically open to small businesses. The elderly and the vulnerable are often more comfortable in having a small, local business undertake work of this kind rather than large operators from other parts of the UK. It is important that even when small businesses have made it on to registered supplier lists that Local Authorities recognise the advantages of using small local firms and avoid overuse of a few large companies simply through familiarity with company order processes.

We also support the Combined Heat and Power (CHP) initiatives. Whilst not being as efficient as localised energy production, CHP actually saves energy because being in the home, there are very small distribution losses (as opposed to 30% losses from centralised power stations).

However, the policy should adopt a pragmatic approach and it should not introduce new terms and conditions that would place the West Midlands construction industry at a competitive disadvantage to other regions.

Question ENV19: *Which of the Renewable Energy Target Options do you think should be used in the WMRSS to promote the development of renewable energy and low carbon technologies in the West Midlands? (see page 90).*

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

Please provide reasons for your answer.

Option 3 takes account of local capacity and potential without constraining sub-regional

areas to a one-size-fits-all regional approach. There must however, be safeguards to ensure sub-regional targets are developed to take account of regional strategic objectives. There are a range of companies in the West Midlands developing new forms of sustainable energy. This includes the recycling of a range of wastes including farm waste, and the development of high efficiency burners. It is these companies who need the support of regional bodies such as AWM, but who struggle to get recognition.

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

Please tick one box **Yes** No

Please provide reasons for your answer.

As with Question ENV19, to be effective it should be implemented in such a way that it reflects local capacity and potential.

Small businesses want secure, sustainable and sensibly priced energy supplies. They look to the Regional Spatial Strategy to instigate policies which help meet this objective.

Bio-energy is an energy source that could be ideally suited to the West Midlands region – with 80 per cent of the land mass of the region devoted to the rural economy.

We would therefore support the West Midlands Business Councils' request to encourage specific reference in the revised Regional Spatial Strategy on the need to develop the biomass sector and for practical work with the industry in developing capacity for this sector.

Landfill gas must be captured and re-used, to avoid waste of a valuable resource. Methane gas is widely recognised as a more toxic gas than many others, but it can be used as a sustainable solution to the UK's domestic gas needs.

Coal

The Staffordshire and Warwickshire coal fields are one of this region's greatest natural resources. The industry has gone through a steep decline but the pressing energy needs of the country may provide new opportunities for coal.

There are real opportunities to be gained from the coal fields, not only from a commercial perspective but also to address concerns regarding energy shortages and security of energy supply to an increasing regional population.

We would also support the West Midlands Business Council's encouragement of the West Midlands Regional Assembly and other regional public bodies, together with the business community, to positively engage with the new Coal Forum to investigate any actions – from the point of view of the planning regime – that could help fulfil the

Impact of fauna, flora and animal life

Noise

Odour

Traffic Implications

Visual Impact

Other factor(s) (please specify below)

Positive Uses of the Green Belt

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

Please tick one box

Option 1: Develop a Regionally Specific Green Belt Policy

Option 2: Apply PPG2

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

There is a real need for a more flexible approach to the re-use and conversion of existing buildings. This development is hampered by the fact that many farm and agricultural buildings are located in countryside that has Greenfield status and are governed by overly restricted rules in relation to the re-use of existing buildings and farm diversification in particular.

The FSB would like to see the West Midlands Regional Spatial Strategy:

- Recognise and commit to the crucial role that rural economies have to play in sustaining rural communities
 - Provide a sensible joined-up approach to planning to remove the assumption that planning applications are 'bad' per se and will damage the sustainability of rural areas to enable a real, living, working countryside to operate.
 - Make it clear that our countryside is open for business by ensuring the planning system does not unnecessarily restrict economic development of our rural towns and villages.
-

Minerals

Safeguarding Mineral Resources

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

No response

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

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

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

No response

Please tick one box Yes No

If yes, please provide reasons for your answer.

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

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

No response

Please tick one box Yes No

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

If no, please give reasons for your views.

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

No response

Non-Mineral Development in a MCA comprising more than:

- 5000 sq metres for offices/retail/tourist/leisure/development
- 2 hectares for any Use Class B1, B2, B8
- 1 hectare for any residential development

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

Question M5: *What minerals related infrastructure should be safeguarded in the Region?*

No response

These could be for example:

- Sites / facilities for concrete batching
- the manufacture of coated materials
- other concrete products
- the handling, processing and distribution of substitute, recycled and secondary aggregate material using local rivers, inland waterways and rail.

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

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

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

No response

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

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

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

Please tick one box Yes No

If yes, what matters should the policy address?

See response to question ENV20.

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

Please tick one box Yes No

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

There are commercial opportunities within the coalfields for coal seams that currently cannot be mined using conventional methods.

There are new developments surrounding the concept of carbon sequestration by injecting carbon dioxide into deep mines where it is not possible to extract the coal. The process often displaces methane which can be recovered as a commercial energy source and sold to offset costs.

We support the call of the West Midlands Business Council to encourage the West Midlands Regional Assembly to allow the development of this sector within the RSS and thereby help with the wider regional economy and reduce carbon emissions, especially in terms of developing the correct planning regime for this sector to develop and meet environmental needs as part of the revised RSS.

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

Are there any other matters which an updated Policy M4 should address?

Future Supplies of Construction Aggregates

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

No response

Please tick one box Yes No

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

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

No response

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

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

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

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

Ideally, the recovery and grading of recycled aggregate material should be undertaken on site, but often size and location can make this difficult, especially in residential areas.

Given the extent of brownfield sites across the West Midlands and the anticipated pressure on supply for aggregate material with the planned house building programme, recovered/recycled material from demolition sites will be an important element in the supply of such materials. Therefore we would look for a commitment to the use of recycled and secondary aggregate material within the WMRSS and local planning guidelines that do not impose additional and unhelpful restrictions on businesses engaged in the necessary activities that will help with that commitment.

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

No response

- Future Patterns of Housing and Employment growth
- Existing Mineral Infrastructure
- Local Resource Availability
- Environmental Acceptability and Designations
- None of the above
- Other (please specify)

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

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

No response

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

Please provide reasons for your answer.

Future Brick Clay Provision

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

No response

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

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

No response

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

Please provide reasons for your answer.

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

No response

- Please tick one box Yes No

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

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

No response

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

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

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

Executive Summary of Recommendations

Critical Rural Services

- Rural public services should not be seen by planners and other decision makers as an optional extra for regional planning policy.
- Attention should also be given to the role buses and coaches play in public transport journeys and we urge local authorities to reconsider their attitudes to coach and car parking services.
- The West Midlands Regional Spatial Strategy needs to factor in transport improvements to cope with the scale of increase in house building that is proposed.
- Bus services and Park & Ride parks should operate with small business owners in mind.
- Maintenance of B Roads should be improved in recognition of the strategic importance of many, especially where they serve business parks and industrial estates and to improve regional business traffic flows.
- River crossings within the Region and linking other parts of the country should be increased and improved.
- The Spatial Strategy should recognise and commit to the crucial role that rural economies have to play in sustaining rural communities
- The Spatial Strategy should provide a sensible joined up approach to planning to remove the assumption that planning applications are 'bad' per se and will damage the sustainability of rural areas to enable a real, living, working countryside to operate.
- Schemes such as the Shropshire Pathfinder scheme and The Rural Regeneration Zone of covering parts of Shropshire, Herefordshire and Worcestershire should be rolled out across all rural parts of the region.
- A range of other initiatives should also be considered including One Stop Shop for Business Services, fulfilment of public procurement contracts by local rural businesses, locating skills training in rural communities and provision of improved broadband over 4mbps

Culture, Sport and Tourism

- An analysis of the region's cultural assets should be undertaken again as a matter of urgency.
- There should be specific and clear guidance in the Regional Spatial Strategy to ensure a consistent approach from local authorities and the relevant parts of the Highways Agency in respect of signage.
- Birmingham should provide more multi-lingual signage for non-English speaking visitors to the City.

Quality of the Environment

- Planning guidance regarding agricultural land should be more flexible toward the re-use and conversion of existing buildings.
- Landfill gas must be captured and re-used, to avoid waste of a valuable resource.
- The issue of a secure and safe energy supply must be addressed within the Spatial Strategy with regard to the planned house building programme
- Access to contracts for the fitting of insulation in existing housing stock should be realistically open to small businesses.
- Flood defence equipment storage to be located throughout areas which are deemed to have a high flood risk. Such areas for depots could be set aside within Local Development Plans under guidance set within the RSS.
- Other forms of flood defence should be considered as new innovative designs are developed.
- Provide a sensible joined-up approach to planning to remove the assumption that planning applications are 'bad' per se and will damage the sustainability of rural areas to enable a real, living, working countryside to operate.

Minerals

- The Spatial Strategy should provide a commitment to the use of recycled and secondary aggregate material within the WMRSS and local planning guidelines that do not impose additional and unhelpful restrictions on businesses engaged in the necessary activities that will help with that commitment.