

WEST MIDLANDS REGIONAL SPATIAL STRATEGY (RSS) PHASE 2 REVISION

PORTFOLIO RESPONSIBILITY: ENVIRONMENT

CABINET

22 FEBRUARY 2007

Wards Affected

Countywide.

Purpose

To respond to the West Midlands Regional Spatial Strategy – Phase Two Revisions Spatial Options.

Key Decision

This is not a Key Decision but the recommendation, if accepted, is likely to have implications for Key Decisions in the future.

Recommendation

THAT the responses to the questions posed in the Spatial Options document as set out in this report be forwarded to the West Midlands Regional Assembly

Reasons

To ensure the Council's views on the Spatial Options are made clear to the West Midlands Regional Assembly.

Considerations

1. The West Midlands Regional Assembly is undertaking a major consultation upon the Phase Two revision of the Regional Spatial Strategy. The eight-week 'Options' consultation, which runs until the 5th March, focuses on the major issues of housing, employment land, transport and waste. The development of the options follows an earlier consultation (February 2006) when the Council, along with other strategic planning authorities, provided advice to the Assembly regarding sub-regional issues.

Summary of the Options

2. The Spatial Options set out a wide range of questions and choices relating to the development of the Region up to 2021 or, in respect of housing and employment 2026.
3. In respect of **housing** key considerations in the Spatial Options include the levels type and distribution of housing in the Region. There are three Options, Option One is based on the current RSS, projected forward to 2026 (381,000 new dwellings), Option Two takes into account information given by the strategic planning authorities in terms of how many new homes they can provide (491,200 dwellings). Option Three is based on meeting the high levels of demand set out in the latest published

Further information on the subject of this report is available from
Kevin Singleton, Team Leader Strategic Planning on 01432 260137

housing projections (575,000 new dwellings).

4. Although there are three Options there are only two levels of housing growth suggested in the consultation in respect of Herefordshire. Option 1 proposes a housing figure of 16,000 dwellings to be completed over the period 2001-2026. Options 2 and 3 propose 20,500 dwellings. At regional level, the additional 83,300 dwellings in Option 3 have been distributed to the parts of the region that have a relatively high level of housing demand. Herefordshire, being relatively remote from the areas of highest demand, has not been allocated a higher level of housing growth by Option 3.
5. The consultation also poses questions regarding the role of the Sub-regional foci and whether these towns are capable of accommodating increased levels of growth; and also raises the issue of increasing the provision of affordable housing across the region.
6. In the **employment** section, the consultation seeks to determine how much land should be set aside for industry, offices, warehousing, and for large inward investment sites and business parks. The Options indicate that one way in which employment land requirements could be achieved is through a five year “reservoir” of readily available land based on an analysis of past trends. Using this method Herefordshire would require an indicative readily available 5 year reservoir figure of between 22 and 24 hectares of land (110–120 hectares over the period 2001-2026).
7. Hereford is identified as a strategic centre in the current RSS and the role and scale of housing development will also need to be reflected in terms of related retail and leisure provision. The Options document suggests that Hereford will require around 30,000 sq metres of comparison retail development up to 2021. In respect of additional office floorspace the Options indicate a Herefordshire total of 80-90,000 sq metres will be required between 2001 and 2021, 30,000 sq metres of which would be in Hereford.
8. The main principle underpinning the **Waste** Options is that each waste planning authority (WPA), should in future identify sites to manage all the waste in its areas and that only the residues from any waste treatment processes should be landfilled. In addition, a variety of new facilities will need to be built ranging from small composting sites to larger recycling and recovery plants.
9. The **Transport** Options cover a range of issues including strategic park and ride, car parking standards, road user charging and the role of airports in the region. Options on car parking standards focus on what needs to be done to ensure appropriate levels of parking supply and availability in everything from rural market towns to larger centres like Hereford. Another key area which impacts on the region is the introduction of demand management/road user charging to reduce congestion in some of the busiest parts of the region.

Suggested response to the Options

10. The attached schedule sets out suggested responses to the consultation questions dealing with issues which have potential to impact upon Herefordshire.
11. Although dealing with a range of issues the headline topic contained within the

Phase Two Revision are the levels of housing growth proposed by the Options. In May 2006 Herefordshire Council, as a strategic planning authority, responded to a request for advice regarding the Phase Two Revision of the RSS by the Regional Assembly. The Council's response acknowledged potential benefits of increasing the rate of housing growth in the County in respect of enabling higher numbers of affordable housing and potentially higher contributions to infrastructure projects. However, the advice also drew attention to the need for improved transport infrastructure at all levels of housing growth and the potential environmental implications for increasing the level of housing provision in the County. The advice from strategic planning authorities has been taken into account in drafting the Options.

12. Subsequent to the preparation of the advice to the Regional Assembly, Herefordshire Council was invited by Government to bid for New Growth Point status, whereby in return for agreeing to support the provision of higher levels of housing growth than currently proposed in adopted plans bids could be made for Government funding for capital schemes or for growth related studies to enable the growth to happen. New Growth Point status is not a statutory designation and the level of housing provision will need to be confirmed through the regional and local planning processes. In October 2006 the Government announced that Hereford was included in the list of New Growth Points.
13. In view of the confirmation of New Growth Point status it is considered appropriate that support is given to the housing levels proposed in Options 2/3 for Herefordshire. In supporting this level of housing growth, a number of caveats need to be expressed to ensure that the levels of development proposed are feasible:

- I. Infrastructure provision

As set out in the Council's advice to the Regional Assembly in 2006, future housing development in Hereford will have significant implications for transport infrastructure requirements. Much of the network is at or beyond capacity, giving rise to congestion and there has been a recent designation of an extensive Air Quality Management Area through the centre of the city.

The issue of congestion in Hereford is already recognised within the current RSS in paragraph 9.69. This indicates that the partial review of the RSS will need to be informed by the local multi-modal study completed in 2003. The local multi-modal study has now been incorporated into the Council's transport strategy as set out in the LTP2 and its longer-term strategy to 2031. The LTP2 strategy concludes that a package of measures is required to release travel capacity in order to enable development to be accommodated, including the development in the longer term (2016-2031) of an outer distributor road. The package will be required to accommodate existing levels of housing development proposed in the RSS i.e. Option 1, so the RSS should make the contents of the package a priority, including making reference to the outer distributor within policy T12. In addition it will be essential to make appropriate links between the relevant policies within the Communities for the Future Chapter and Transport and Accessibility if the RSS is to be successfully implemented.

Higher levels of housing as suggested in Options 2 and 3 would also lead to an increase in the level of long distance commuting. Increasing both the capacity and reliability of the rail network through Herefordshire would be necessary to enable such commuting to be undertaken by public transport rather than by road. In particular, capacity improvements should be considered on the Hereford – Worcester

line. Again, this should result in a specific mention in policy T12 to acknowledge the Region's endorsement of appropriate investment required in rail network to support the increased allocation of housing and the resultant demand for commuter trips between Herefordshire and larger centres in the region.

II. Distribution of housing development

In respect of the distribution of housing although it is acknowledged that Hereford, as a sub-regional focus for new development will be the preferred location for significant levels of new development, the City could not accommodate all of the growth proposed in the County under Option 2/3. The County's market towns would also be required to take an increased level of housing growth. The requirement to spread development throughout market towns in the west of the region in Options 2/3 is acknowledged on page 29 of the Options document. However, this will also need to be recognised through changes to RSS policies such as policy CF2 and its associated supporting text.

Additional development within the market towns is also likely to result in requirements for new or improved transport infrastructure. In Leominster, the largest of the market towns in the County, significant development beyond that currently proposed in the Herefordshire UDP is likely to result in the need for an A44 east-west link road. Whilst it is anticipated that this road would need significant developer contributions to bring it forward, if Options 2 or 3 are favoured this scheme should also be highlighted in policy T12, given its role in supporting the RSS and the increased allocation of housing within the County.

III. Greenfield/brownfield split

Current RSS in Table 3 provides a target for the percentage of housing development on previously developed land. Increased levels of housing growth as proposed in Options 2 and 3 in Herefordshire will require the release of additional greenfield land and the need to reassess existing brownfield targets.

14. Affordable housing is also a topic area covered by the Options. A suggestion in the document is that district level figures for affordable housing could be included in the RSS. However, an affordable housing target set at regional level for district Council areas may become rapidly out of date, as it is difficult over any geographical area to set affordable housing requirements for a significant period. Although it may be possible to provide an indicative regional figure, it will be more difficult for region to provide robust district level targets at regional level. Locally derived figures may well be more accurate, up to date and better reflect the needs of Herefordshire.
15. In respect of the employment land options the reservoir approach suggested in the document is broadly supported. However, the Options do need to include some recognition that the need for public sector involvement in the provision of employment land and overcoming constraints to development can often lead to extensive lead in times for the provision of readily available employment land. Therefore, there should be some flexibility in the targets set in the RSS for the provision of employment land through the use of a range of figures rather than a precise maximum or minimum target.
16. As in the existing RSS, Hereford is recognised as a strategic centre in the Options paper. The suggested hierarchy in the Options defines Hereford as a level 3 centre (with other centres such as Worcester and Shrewsbury) with a requirement of 30,000 sq m net of additional comparison retail development for the period 2005-2021.

These levels of provision are considered appropriate. The office targets set out in the Options will prove particularly challenging. The Options propose only a third of the office target to be met in Hereford. Given Hereford's role as sub-regional focus for development and as a strategic centre and recent rates of office completions, which have been relatively modest, both the level and distribution of office development should be reconsidered.

17. In respect of waste it is considered reasonable to specify in the WMRSS the principle that each waste planning authority (WPA) or sub-region should: manage its waste arisings in accordance with the waste hierarchy; allocate sufficient land in Local Development Documents (LDDs) to manage the amount of waste arising within its boundary, taking account of the growth in the numbers of new households and diversion of commercial and industrial Waste from landfill. However, it should also be acknowledged that where agreements exist between WPA, such as with Herefordshire and Worcestershire Council's, on waste matters, that the above is also taken into account.
18. In the transport section of the Options report it is suggested that regional parking standards may be appropriate. However, whilst it is recognised that PPS11 does provide for regional parking standards being set it is not considered that there is any necessity for setting regional standards in the West Midlands. The national parking standards are clear and provide highway authorities with the appropriate level of guidance. It is for specific highway authorities to determine how best to apply these standard and consider appropriate exceptions. If consistency is required between different highway authority areas this is likely only to apply to the conurbation where a uniform approach to reducing requirements may be required to coordinate demand management in support of policies such as road user charging for example.
19. In addition to the responses to the direct questions raised in the Options document the following issues, which were raised at the RSS stakeholder event in Hereford on 7th February, are considered appropriate to be included as part of the response to the Assembly:
 - it is important that the RSS revision is fully aligned with the development of the Regional Economic Strategy;
 - in setting targets within the RSS revision any figures (for example for housing completions employment land or offices etc) should be justified by clear and demonstrable evidence;
 - in developing the preferred option, the particular needs of rural areas should be properly addressed; and
 - the Spatial Options should also ensure that the impacts of the various growth levels on climate change should be explicitly considered.

Risk Management

No significant risks involved

Alternative Options

Not to respond to the consultation

Consultees

None

Appendices

Schedule of responses to the questions set out in the West Midlands Regional Spatial Strategy – Phase Two Revision Spatial Option

Appendix 1: Schedule of responses to the questions set out in the West Midlands Regional Spatial Strategy – Phase Two Revision Spatial Option

Topic	Question	Suggested Response
Housing	H1: What overall level of new housing development do you think is appropriate to plan for across the Region?	Herefordshire Council recognise that there is a need for increased housing growth over that set out in the existing Regional Spatial Strategy. Herefordshire Council would support the level of housing growth proposed in Option 2/3 for the County (subject to a number of caveats). However, in proposing such significant increases in housing growth across the Region it should be recognised that it will prove more difficult to implement the redistribution of housing provision proposed in the existing RSS therefore at the higher levels of housing growth and, in particular, at the growth rate proposed by Option 3, the Phase Two Revision risks turning into a new Spatial Strategy . Higher levels of growth will also set additional challenges in respect of the increased use of greenfield land, potential impact upon the environment of the Region and in respect of climate change.
	H2: Can you suggest another level? There needs to be robust evidence to support it.	No specific evidence to support alternative level of housing growth.
	H3: For each of the Options do you think that the balance of development between the MUAs and other areas is acceptable?	See response to question H1.
	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?	In Herefordshire evidence of past rates of house building would suggest that the Options can be achieved. For example between 1991 and 2001 there were almost 10,000 completions in the County at an average of 1,000 per annum. This rate is higher than the 820 per annum suggested by Options 2/3 .
	H5: What measures could be included in WMRSS policy to minimise these impacts?	
	H6: Table One and Table Two 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?	See response to question H1.

Topic	Question	Suggested Response
	<p>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.</p>	<p>Support is given to the housing levels proposed in Options 2/3 for Herefordshire. In supporting this level of housing growth, a number of caveats need to be expressed to ensure that the levels of development proposed are feasible:</p> <p>Infrastructure provision - As set out in Herefordshire Council's advice to the Regional Assembly in 2006, future housing development in Hereford City will have significant implications for transport infrastructure requirements. Much of the network is at or beyond capacity, giving rise to congestion and there has been a recent designation of an extensive Air Quality Management Area through the centre of the City.</p> <p>The issue of congestion in Hereford is already recognised within the current RSS in paragraph 9.69. This indicates that the partial review of the RSS will need to be informed by the local multi-modal study completed in 2003. The local multi-modal study has now been incorporated into the Council's transport strategy as set out in the LTP2 and its longer-term strategy to 2031. The LTP2 strategy concludes that a package of measures is required to release travel capacity in order to enable development to be accommodated, including the development in the longer term (2016-2031) of an outer distributor road. The package will be required to accommodate existing levels of housing development proposed in the RSS i.e. Option 1, so the RSS should make the contents of the package a priority, including making reference to the outer distributor within policy T12. In addition it will be essential to make appropriate links between the relevant policies within the Communities for the Future Chapter and Transport and Accessibility if the RSS is to be successfully implemented.</p> <p>Higher levels of housing as suggested in Options 2 and 3 would also lead to an increase in the level of long distance commuting. Increasing both the capacity and reliability of the rail network through Herefordshire would be necessary to enable such commuting to be undertaken by public transport rather than by road. In particular, capacity improvements should be considered on the Hereford – Worcester line. Again, this should result in a specific mention in policy T12 to acknowledge the Region's endorsement of appropriate investment required in rail network to support the increased allocation of housing and the resultant demand for commuter trips between Herefordshire and larger centres</p>

Topic	Question	Suggested Response
		<p>in the region.</p> <p>Distribution of housing development</p> <p>In respect of the distribution of housing although it is acknowledged that Hereford, as a sub-regional focus for new development will be the preferred location for significant levels of new development, the City could not accommodate all of the growth proposed in the County under Option 2/3 and the County's market towns would also be required to take an increased level of housing growth. The requirement to spread development throughout market towns in the west of the Region is acknowledged on page 29 of the Options document, however, such this will also need to be recognised through changes to RSS policies such as policy CF2 and its associated supporting text.</p> <p>Significant additional development within the market towns is also likely to result in requirements for new or improved transport infrastructure. In Leominster, the largest of the market towns in the County, significant development beyond that currently proposed in the Herefordshire UDP is likely to result in the need for an A44 east-west link road. Whilst it is anticipated that this road would need significant developer contributions to bring it forward, if Options 2 or 3 are favoured this scheme should also be highlighted in policy T12, given its role in supporting the RSS and the increased allocation of housing within the County.</p> <p>Greenfield/brownfield split</p> <p>Current RSS in Table 3 provides a target for the percentage of housing development on previously developed land. Increased levels of housing growth as proposed in Options 2 and 3 in Herefordshire will require the release of additional greenfield land and the need to reassess existing brownfield targets.</p>
	<p>H8: In particular, do you think that Burton upon Trent should be a foci settlement, accommodating significant development on greenfield land?</p>	<p>At higher levels of housing growth may need other foci such as Burton to enable growth to be accommodated.</p>
	<p>H9: Do you think that the currently identified sub-regional foci of Worcester, Telford, Shrewsbury, Hereford and Rugby should fulfil</p>	<p>Sub regional foci can play a part in accommodating additional growth but at levels proposed by options 2 and 3 it will be necessary to consider additional</p>

Topic	Question	Suggested Response
	this role, accommodating significant development on greenfield land?	locations (see response to H7).
	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?	Yes – This would be Herefordshire’s preferred approach.
	H11: What would the implications be of having a District level affordable housing target (as a minima) in the WMRSS?	Implications are that any RSS affordable housing target may become rapidly out of date, as it is difficult over any geographical area to set affordable housing requirements for a significant period. Local need studies may only have a shelf life of around three years. Although it may be possible to provide an indicative regional figure, it will be more difficult for region to provide robust district level targets at regional level. Locally derived figures may well be more accurate and up to date.
	H12: Do you have any other ideas on how levels of affordable housing delivery can be better directed by the WMRSS?	No.
	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?	No.
	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?	If there is robust evidence available it may be appropriate to give some advice in the RSS. However, levels of housing need can significantly vary within local authority areas and it is not only levels of housing need which can result in the need to have lower thresholds. For example, in rural parts of Herefordshire there are very few sites for 15 or more dwellings (in 2006 there were only 4 outstanding planning permissions out of 533 permissions in the rural parts of the County for 15 or more dwellings) therefore, irrespective of the level of housing need, adopting the PPS3 threshold would result in almost no affordable housing. Therefore, even if the RSS does identify areas with a high need for affordable housing, there should still be the flexibility for thresholds to be set locally where evidence justifies such an approach.

Topic	Question	Suggested Response
	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 in Herefordshire regarding the mix of existing housing stock suggests that there is preponderance of more highly valued properties in rural areas of the County. Many parishes have few or no dwellings in Council Tax bands A and B and all parishes have proportionally fewer Band A and B stock than are found in the more urban areas (see table below). This stock imbalance is further aggravated by the Right to Buy legislation, which has the effect of removing the better properties from the mix of rentable properties. Thus leaving the poorer quality properties as affordable housing (rented from RSL), this has caused a stock imbalance.
	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?	If the higher figures are to be achieved land will need to be released in foci and other urban areas. The challenge will be to release land in these locations and still achieve high rates of housing development in the MUA's on what may be more difficult and more expensive land to develop.
	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?	Given growth agenda difficult to justify maxima outside of MUA's. However, the removal of maxima targets increases the risk of undermining existing strategy.
	H18: Do you think the use of minima targets for the MUAs is still appropriate?	This would risk undermining the existing spatial strategy resulting in more development occurring outside of the MUA's than within it.

Topic	Question	Suggested Response
Employment	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.	The WMRSS should provide guidance upon employment land requirements - including employment land requirements/targets. - however, there should be some local flexibility to take account of local circumstances and opportunities.
	E2: If the amount of employment land requirements is included, should it be broken down to Strategic Authority or district levels?	For consistency with housing requirements it may be appropriate to disaggregate to district levels although as a Unitary Authority the approach will not impact upon Herefordshire.
	E3: Do you agree with the principle of a reservoir of employment land?	Yes. Reservoir approach of employment land provision is supported. However, there again remains the need for some flexibility in defining the size of reservoirs - to ensure that this approach does not lead to the loss of good quality (or potentially good quality) employment land.
	E4: What period of time should the reservoir cover?	Five year reservoirs would generally seem appropriate with indicative longer-term figures (again generally consistent with the need for 5 years supply of housing land). However, there does need to be recognition of the long lead in times for bringing employment land forward, often due to physical constraints and the need for public sector funding.
	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.	As set out in the Section 4(4) advice Herefordshire consider that the figures could be expressed as a range rather than a maxima or minima. This could recognise the thrust of the RSS but would allow some flexibility.
	E6: Outside of the MUAs should employment land figures be identified as maximum or minimum figures?	See response to E5.
	E7: Should employment land requirements set out in Table 3 be adjusted to take account of: Number and type of households Anticipated changes in past trends Labour supply growth Population The need to provide a portfolio of employment sites	All factors listed are relevant to take account of in setting employment land requirements. Other suggestions could include: Some recognition of changing work patterns with increased working from home and potentially increasing need for live/work units; Quality of sites, Local employment densities; Availability of local infrastructure.

Topic	Question	Suggested Response
	<p>Increased need for waste management facilities Options areas of deprivation and employment need Other Suggestions</p>	
	<p>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.</p>	<p>Examination of employment completions in Herefordshire over 20 year period (1986-2006) suggest slightly higher average of 4.8 ha per annum, however, examination of past rates also highlights the significant fluctuations in the rate of completions. Therefore, the need to be quite so precise in including targets in Table 3 is questioned, again as in response to E5 above the use of ranges of figures is preferred.</p>
<p>Protection of Employment Land</p>	<p>PEL1: Should the WMRSS give more guidance on the need to retain employment sites which can contribute to the portfolio of employment land?</p>	<p>Yes. This would help the protection of suitable employment sites against competing land uses, especially housing. Likewise, the guidance could also indicate on sites which are more suitable to being released for an alternative land use, especially where their employment. economic contribution potential is limited or overly restricted.</p>
	<p>PEL2: Should the WMRSS identify the need to protect waste management sites from competing uses?</p>	<p>Yes. Given that the provision of waste management sites can prove controversial, the guidance upon the safeguarding of existing sites would prove useful. As such sites will often be located on employment land and this should be taken account of in setting employment land requirements.</p>
<p>Regional Investment Sites</p>	<p>RIS1: Do we fill the gaps in the provision of RIS?</p>	<p>No specific comments on Regional Investment Sites.</p>
	<p>RIS2: If yes, what processes should be used for filling the gaps in provision?</p>	
	<p>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.</p>	

Topic	Question	Suggested Response
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.	No specific comments on Major Investment Sites.
	MIS2: If no, what are the options for additional provision?	
	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?	
Regional Logistics Sites	RL1: Significant growth in logistic provision in the Region is anticipated. Should part of this growth be accommodated on RLS?	No specific comments on Regional Logistic Sites.
	RL2: If yes, how many RLS are needed?	

Topic	Question	Suggested Response
	<p>RL3: The Stage Two study recommends the following criteria for RLS. Do you agree?</p> <p>At least 50 hectares of development land available.</p> <p>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.</p> <p>Has good quality access to the highway network.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Located away from incompatible neighbours, allowing 24 hour operations no restrictions on vehicle movements.</p> <p>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.</p> <p>Minimising the impact on the local environment.</p>	
	<p>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?</p>	

Topic	Question	Suggested Response
	<p>RL5: Do you agree that these areas are the best broad locations for RLS provision?</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Other Suggestions</p>	
	<p>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.</p>	
Strategic centres	<p>SC1: Do you have any comments on these levels of provision?</p>	<p>Hereford is defined as a Level 3 centre (with centres such as Worcester and Shrewsbury) with requirement of 30,000 sq m net of additional comparison retail development for the period 2005-2021. These levels of provision are considered appropriate for Herefordshire.</p>
	<p>SC2: Do you have any comments on the assumptions included in the Regional Centres Study?</p>	<p>No comment on assumptions of Regional Centres Study.</p>

Topic	Question	Suggested Response
	SC3: Do you have any comments on the suggested thresholds for referral to the RPB?	Suggested thresholds do not change for Herefordshire, no comment.
	SC4: Should an upper limit for development in non-strategic centres be introduced in order to protect the role of the strategic centres?	Defining an upper limit for development outside of the strategic centres would be a reasonable course of action. Whilst the importance of the market towns in Herefordshire is not to be undermined, it is important that they are considered within the strategic context of the County. It is unlikely that any of the market towns could viably accommodate any more than 10,000-15,000 sq/m of floorspace, and such a limit would therefore be acceptable.
	SC5 Do you think that WMRSS policies should give priority to centres where people currently travel away for retail and leisure?	In sustainability terms, it would be considered beneficial to prioritise the centres that are least locally dominant (centres where residents have to travel away from to access retail and leisure facilities). However, this must be considered within the context of distance travelled to access such facilities. If such centres were only 20 miles from the strategic centres where they are able to access services then it would make sense to focus development in such strategic centres. In Herefordshire, for example, Hereford is extremely dominant within the county due to its relative isolation from competing centres. The market towns are in relative proximity to Hereford and have the benefit of larger urban settlements that are within equidistance of Hereford, offering a choice of destinations. It would therefore be a rather pointless exercise to focus new development within the market town's as their catchment areas are relatively small and would therefore not draw the required custom from larger centres to make them viable.
	SC6: Do you think that WMRSS policy should support this regeneration approach?	The regeneration approach is supported, although it is considered that significant public sector investment could be required to attract the market to such centres.
	SC7: Do you think that WMRSS policy should support this market led/opportunity approach?	Centres described as healthy or very healthy will be able to remain competitive without any emphasis being placed upon them in the WMRSS. It may however be beneficial to identify those that have aspirations to expand, especially those that have been identified as growth points. Their identification within the WMRSS would establish the policy background for such growth.

Topic	Question	Suggested Response
Offices	O1: Do you have any comments on Table 4 that will help the RPB to develop an office provision policy?	No comment on layout of table.
	O2: Do you think the Centres Study has identified the right levels of additional office floorspace/development?	The Options propose only a third of the office target to be met in Hereford. Given Hereford's role as sub-regional focus for development and as a strategic centre and recent rates of office completions, which have been relatively modest, both the level and distribution of office development should be reconsidered. There may, however, be opportunities to increase Office development in the County, for example as part of the Edgar St. Grid and in Model Farm at Ross.
	O3: If no, do you have any robust evidence that can support your comment and the development of the Preferred Option?	Evidence of recent rates of office development in Herefordshire suggest that only around 4,500 sq m of office floorspace has been completed over the last 5 years. This suggests that 80-90,000 sq m for the period up to 2021 is likely to be unrealistic for Herefordshire.
	O4: Do you think this sequential approach to out of centre office development is the best approach?	Yes sequential approach to aspects of Planning has become well understood through application of PPS6.
	O5: Do you think WMRSS policy should set out maximum percentages for out of centre office development?	No, see response to O4.
	O6: If yes, what percentage would you suggest?	
	O7: Do you think that WMRSS policy should set out criteria for out of centre office development?	
	O8: If yes, what criteria would you suggest?	
	O9: Do you have any additional comments about out-of-centre office development?	May need to begin to consider implications of development of new forms of working – e.g. working from home and provision of live/work units.
Regional Casinos	RC1: The guidance in the WMRSS for where Regional and large Casinos go should be based on assessing the impact on Urban Renaissance?	No specific comments in respect of Regional Casinos.

Topic	Question	Suggested Response
	RC2: Should WMRSS policy state that large casinos should in the first instance be in town and city centres?	
	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?	
	RC4: If yes, what criteria would you suggest?	
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?	It would be reasonable to specify in the WMRSS the principle that each WPA or sub-region should; manage its waste arisings in accordance with the waste hierarchy; allocate sufficient land in Local Development Documents (LDDs) to managing the amount of waste arising within its boundary, with appropriate growth rates in new households and diversion of Commercial and Industrial Waste from landfill. However, it should also be acknowledged that where agreements exist between WPA, such as with Herefordshire and Worcestershire, on waste matters, that the above is also taken into account. In addition provision needs to be made to address the revision of the National Waste Strategy when it is published. The delay in its release is thought to be due to the revision including reference to and new targets in taking into account the effects of global warming on Waste Management and landfill in particular. This makes it more difficult to sign up for proposals and new targets when a national strategy is not known.
	W2: If no, suggest an alternative approach;	No alternative approach suggested.
	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.	This would seem to be the least environmentally damaging method of dealing with increased capacity issues.
	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	Criteria suggested are acceptable.

Topic	Question	Suggested Response
	<p>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 cartilage; and Be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections</p>	
	W5: If no, suggest alternative criteria below;	No comment.
	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 openness of land or the objectives of Green Belt	In principle waste management facilities could be permitted on open land, including Green Belt, when the facility was close to the communities producing the waste; where no alternative site exists and where it would not harm the openness of the land or the objectives of the Green Belt. The protection of the general environment should also be considered in identifying suitable locations and a degree of flexibility should be allowed for individual cases, as ideally, such facilities should be located in more appropriate locations.
	W7: Do you have any comments on the tables on pages 59-60?	No significant comment upon these tables.
	W8: Should the WMRSS policy for Commercial and Industrial Waste be based on: a-low - the current levels of diversion of commercial and industrial waste arising 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 reflect 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?	In the long term opting for a high rate of diversion from landfill of the total percentage of commercial and industrial waste being landfilled may have significant benefits. However, due to technical and funding issues a compromise would be to develop policies based on a medium diversion percentage of commercial and industrial waste from landfill. This would at least encourage the requirement of new initiative projects for this type of waste in dealing with the general predicted increase for commercial and industrial waste resulting from the requirement of greater diversion. This would hopefully lead onto the provision required for the high diversion, previously mentioned, to continue providing adequate provisions from the impacts of increased landfill tax and producer responsibility obligations.
	W9: Should the WMRSS include a policy which requires Waste Development Frameworks to safeguard existing sites for the treatment and management of Hazardous Waste?	With regards to the current situation, as outlined in the contextual information on Hazardous Waste, it would be advisable to include in the WMRSS a policy requiring Waste Development Frameworks to safeguard existing sites for the

Topic	Question	Suggested Response
	treatment and management of Hazardous Waste?	treatment and management of Hazardous Waste.
	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?	Acknowledging current circumstances, giving specific priority on identifying new sites for facilities to store, treat and remediate Hazardous Waste may not be necessary. This is because there is estimated to be adequate existing provision, based on current information, although exact amounts are not known. However, a degree of flexibility is advised here to accommodate any changes in this situation over a given period of time, following more detailed monitoring. With regards to contaminated soils and demolition waste, the continued practice of dealing with it “in situ” to avoid unnecessary, possibly unsustainable movement of Hazardous Wastes and promote the proximity principle in dealing with it, would be advantageous.
	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?	Similarly to W10, WMRSS policy for Waste Development Frameworks need not specify for non MUAs new sites for disposal of Hazardous waste. However, a degree of flexibility is advised given the limited information on the effects of the new categorisation of Hazardous Waste, in case the situation alters and extra provision in these non MUAs is required at a later date, based on further monitoring outcomes. The creation of protective cells in Landfill sites for stable Hazardous Waste maybe a good way of dealing with hazardous waste arisings in accordance with the proximity principle, where facilities allow and where a need has been identified.
	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?	The WMRSS should encourage greater recycling of construction and demolition waste through maximising “on-site” recycling and perhaps “urban quarries” (where material can be recycled to a high standard) could be promoted in the MUAs dependant on where the “variety of sites” are located giving appropriate awareness to the proximity principle.
	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 - As a catalyst for change of behaviour in the way in which waste in the region is dealt with and to enable alternative technologies to come forward and reduce in price, in comparison to landfill.

Topic	Question	Suggested Response
	<p>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?</p>	<p>In the interest of environmental protection and insurances that related legislations/regulations are being complied with, it would not be advisable for the WMRSS to only support the allocation of new landfill sites in 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. The only way around this would be for the WMRSS to state that conditions should be placed on planning consents for landfill stating that no operation, on these additional sites, can begin without first seeking the approval from the Environment Agency in the form of a WML or permit. This should guard against any potential environmental risk.</p>
	<p>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; the proposed activity is appropriate to the area proposed.</p>	<p>In light of tighter restrictions on agricultural holdings disposing of their waste on their own land, potentially resulting in an increase in the waste having to be dealt with outside of the agricultural holding, it is a sensible conclusion that the WMRSS should include a policy requiring relevant waste development frameworks to identify sites for treatment and management of agricultural waste subject to the criteria listed.</p>
	<p>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?</p>	<p>Increasingly developers are going to have to be aware and find solutions for the resulting waste generated from the developments they complete (i.e. the waste generated during the construction and demolition phases of new development). Site Waste Management Plans would be a suitable suggestion to be included as a requirement in local validation checklists.</p>
	<p>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</p>	<p>Currently, monitoring is considered to be insufficient on waste capacity in the region and therefore in order to ensure that provisions for handling and processing waste is judged to be adequate for its purpose, accurate and regular monitoring would be necessary. A requirement for local validation checklists on planning applications for waste management facilities to include information on</p>

Topic	Question	Suggested Response
	waste/facility), without which they will not be registered as valid.	annual throughput capacity in tonnages/litres/cubic metres (depending on the type of waste/facility) would be useful. Improvements in monitoring would also benefit waste managers in local authorities in developing their understanding of commercial and industrial waste streams.
	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'?	It is important to "build in" the infrastructure to enable future residents of new development, whether residential, industrial, commercial and/or retail, to easily and safely dispose appropriately of the waste generated in their homes and businesses. Therefore the WMRSS should require LDDs to have policies that require provision as part of new residential, 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".
Transport & Accessibility		
Strategic Park & Ride	SPR1: Do you agree that the criteria on page 73 are the right criteria?	No specific comment in respect of Herefordshire.
	SPR2: If not what else should be considered?	
	SPR3: Do you agree that Strategic Park and Ride locations may be categorised as "Edge of Major Urban Area" and "External Town"?	
	SPR4: Are the broad locations identified on page 74 the right ones, or should others be considered?	
	SPR5: Do you agree that the "Target Destinations" within the Region are the Centres identified in WMRSS Policy PA11?	
	SPR6: Is London the only "Target Destination" outside the Region that should be accessed by Strategic Park and Ride or are there others?	No specific comment in respect of Herefordshire.

Topic	Question	Suggested Response
	SPR7: Are there opportunities for Strategic Park and Ride in the West Midlands to provide access to “Target Destinations” outside of the Region?	No specific comment in respect of Herefordshire.
	SPR 8: Which of the three approaches (Criteria Based, Location or Target Destinations) do you feel would best provide the guidance needed and why?	Target destination would include centres such as Hereford City in the consideration of strategic P&R if the definition was based on current WRSS Policy PA11. It is felt that this provides greater scope for P&R which considers transport issues beyond the conurbation. Herefordshire would support this approach out of the three options.
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?	Whilst it is recognised that PPS11 does provide for Regional Parking standards being set. Herefordshire Council do not consider that there is a real need for doing it. The national parking standards are clear and provide highway authorities with the appropriate level of guidance. It is for specific highway authorities to determine how best to apply these standard and consider appropriate exceptions. If consistency is required between different highway authority areas this is likely only to apply to the conurbation where a uniform approach to reducing requirements may be required to coordinate demand management in support of policies such as road user charging for example.
	PS2: Should regional parking standards be identified for land uses not included in national guidelines (PPG13: Transport) and if so which?	Notwithstanding the response to PS1 (which is not to set any regional parking standards) it is felt that none of the options for reducing standards are appropriate due to their blunt nature. The application of parking standards is a function of a range of variables including location, site characteristics, nature of land use proposed, availability of alternative transport options, desire of the developer etc. The proposals as indicated would not help Herefordshire determine appropriate parking standards on a case by case basis and would add little to our appreciation of the national standards.
	PS3: Should some parking standards only be defined in Local Development Frameworks, and if so which?	
	PS4: Do you agree with these suggested criteria on page 76?	
	PS5: Should any other criteria be considered?	
	PS6: Do you agree with the principle of dividing the Region into settlement types?	

Topic	Question	Suggested Response
	PS7: Do you agree with the definitions of the settlement types on page 76?	
	PS8: Do you agree with the 50% and 20% reductions?	
	PS9: Do you agree with the Local Accessibility approach on page 77?	
	PS10: Do you agree with the 50% and 20% reductions?	
	PS11: Do you agree with this Site Specific Accessibility approach on page 77?	
	PS12: Do you agree that site specific considerations should result in a 50% or 20% reduction in provision?	
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?	See RUC2 response.
	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 - Policy T8 should be revised to allow for more flexibility given the emergence of national policy on this matter and the lack of certainty over specific schemes proceeding.
Role of Airports	A1: Do you have any comments on the suggested policy revision outlined on page 81?	Due to location of Herefordshire and the identified airports there are no specific comments on these questions.
	A2: What surface access modal split targets should be included in the WMRSS?	
	A3: Do you agree with the roles described on page 82 for each airport?	

Topic	Question	Suggested Response
	A4: Is the requirement for an 'Airport Development Document' an appropriate policy to include in the WMRSS?	
	A5: If an 'Airport Development Document' policy is not supported, then how else can the WMRSS manage the wider impacts of airport development?	
	A6: Should the WMRSS include policies to deal with airport related cross-boundary planning issues?	The WMRSS should consider transport issues impacting on the region whether or not the destination is within or outside the region and whether or not the origin is within or outside the region. Hence, airports of significance to the region, including those in South Wales and the South West are of relevance.