

## West Midlands Regional Spatial Strategy Phase Two Revision

Consultation Response Form on the West Midlands RSS Phase 2 Revision  
Draft submitted by the West Midlands Regional Assembly

### **Making Comments**

It is very helpful to us if you use this form to make your comments and if possible e-mail or post it to the following:

WMRSS Panel Secretary  
c/o Government Office for the West Midlands  
5 St Philip's Place  
Colmore Row  
Birmingham B3 2PW

E-mail: [wm.panelsecretary@gowm.gsi.gov.uk](mailto:wm.panelsecretary@gowm.gsi.gov.uk)

### **Deadline for Comments**

Deadline for receipt of completed forms is **12.00pm on 8<sup>th</sup> December 2008**

### **Additional Copies**

Additional copies of the form can be downloaded from the Government Office for the West Midlands web site at <http://www.go-wm.gov.uk> or [www.wmra.gov.uk](http://www.wmra.gov.uk) or can be requested by contacting Government Office for West Midlands on: 0121 352 5476.

### **How to complete this form**

Please complete a separate copy of the form for each matter that you wish to comment on, showing each time which policy or paragraph of the WMRSS Phase Two Revision Draft Submission documents you are commenting on.

Please note that all comments will be made available for the public to read – they cannot be treated as confidential. However, please be assured, WMRSS Panel Secretary will only use the contact details provided for the sole purpose of distributing appropriate information about this consultation and the next stages of the process.

### **Contact Details**

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<b>I am commenting as (please tick)</b>			
A private individual		Local Authority of Parish Council	
Business representative group		Campaign Group	
Utility and emergency services		Statutory Body or Government Agency	<b>X</b>
Landowner, Developer or Agent		Voluntary / Community group	
Representative of a client		Other (please specify)	
If you are commenting on behalf of a client, please add their name here			

<b>Please indicate which Paragraph or Policy your comment relates to:</b>	
Paragraph Number	Policy <b>PA13B</b> Number

**Please use the section below to give your comments.**

### **Policy PA13B Large-scale Office Development Outside the Strategic Centres**

The Highways Agency supports the development of a strategic approach to out-of-centre office development based on a combination of the application of the PPS6 sequential approach and the plan-led identification of suitable and accessible locations for further development outside the regions defined network of town and city centres.

Consistent with the advice in PPS6 out-of-centre office development should only be permitted where there is an identified need for the development which cannot be met within or on the edge of an existing centre(s), and only then if the site in question is or can be made accessible by a range of sustainable transport modes. The Highways Agency would also wish to see Policy PA13B make it clear that large scale office development should not be encouraged on or close to motorway junctions due to its potential for encouraging local traffic.

The adoption of a plan-led approach to this issue would allow local authorities to be proactive in improving the sustainable transport accessibility of identified out-of-centre development locations. This would also allow for the promotion of an area based approach to 'capturing' developer contributions which could be used towards the delivery of necessary public transport improvements in support of the effective enforcement and delivery of travel plans and an associated reduction in the levels of car parking to serve the wider development.

In adopting a development plan-led approach to the identification of potential sites for out-of-centre office development, Policy PA 13B might also usefully refer to the use of accessibility mapping techniques as a useful tool in identifying the most sustainable locations for their development and the transport measures required to improve access by sustainable transport modes.

To address the issues identified above the Highways Agency would respectfully request that Policy PA13B should be amended to incorporate the following:

- The inclusion of additional text within Policy PA13B which requires that the proposed development should not have an adverse impact on the operational capacity or safe and efficient functioning of the SRN (link or junction) which is incapable of effective mitigation.

- The inclusion of additional text within Policy PA13B which requires that approval for the proposed development will be conditional on the adoption of measures which seek to minimise parking provision across the development linked to the preparation of a travel plan for the whole site, the implementation of proposals for public transport and accessibility improvements and, the implementation of any necessary demand management measures.
- The inclusion of additional text within Policy PA13B which identifies the importance of involving the Highways Agency from the outset of the process of considering emerging proposals for out-of centre office development where there is the potential for impact upon the operation of the SRN. This should refer to the need for the Highways Agency to be involved in agreeing the scope and nature of any Transport Assessments required. The HA should also be involved in scoping the nature of the transport measures required to mitigate the impact of the development on the SRN. This should be carried out in line with the requirements of government policy and the standards set out in the Highways Agency's "*Design Manual for Roads and Bridges*".
- The inclusion of additional text within Policy PA13B which makes it clear that large scale office development on or close to motorway junctions unless it can be demonstrated that the proposal would not have an adverse impact on the operation of the SRN or is capable of being mitigated.
- The inclusion of additional text within Policy PA13B which advocates the use of accessibility mapping techniques as a means of developing a plan-led approach to identifying the most sustainable locations for out-of-centre office development.

(Please continue on a separate sheet if required)