

# Annex E – Audit Trail of Recommendations from the Sustainability Appraisal



## **E1            *AUDIT TRAIL OF SUSTAINABILITY APPRAISAL RECOMMENDATIONS***

### **E1.1            *INTRODUCTION***

To ensure that full and transparent consideration was given to SA recommendations by the Policy Leads responsible for developing the Preferred Option and policies, an 'Audit Trail' report was developed. This report sets out the recommendations from the *Final Draft Sustainability Appraisal* (issued on 17 September 2007), and includes responses from the Policy Leads as to how the recommendations would be taken forward. This report highlights how the Preferred Option and policies were amended to reflect a number of the recommendations that had emerged from the SA process by mid-September.

**RSS Phase 2 Revisions – Audit Trail – Recommendations from the Sustainability Appraisal, as of 27th September 2007**

| Recommended change  | Comment  | Response  | Date    |
|---|--|---|---------|
| Chapter 2: Towards a More Sustainable Region  |  |   |         |
| Policy 1: Climate Change  |  |   |         |
| The policy needs to establish a meaningful and more challenging target for reducing CO2 emissions which all local authorities should be expected to work towards. <sup>1</sup> The adoption of a strong target for the West Midlands would inform the development of many other policies within the RSS, eg standards would be set within the Sustainable Construction policy to deliver the target.  | Agree the need for regional targets, which are being developed through the Action Plan process. No existing targets for inclusion  | No change, but can take on board targets if developed before Examination in Public  | 27/9/07 |
| The issues listed in parts B to D of the policy, which overlap considerably with the Sustainable Communities and Sustainable Construction policies, should be integrated into these policies and removed.   | Policy SR1 accords with Phase 1 Proposed Changes published by Government. Issues set out main opportunities for addressing Climate Change concerns. Other policies take issues further | No change   | 27/9/07 |
| Policy 2: Creating Sustainable Communities  |  |   |         |
| The policy should ask local authorities to:   |  |   |         |
| <ul style="list-style-type: none"> <li>look to deliver housing in sufficiently large developments so that other community resources can be delivered alongside housing more effectively, eg public infrastructure (such as schools, healthcare, cultural, sporting and recreation infrastructure), transport infrastructure, large-scale renewable energy, urban forests and other large greenspaces and biodiversity assets. To deliver sustainable communities, where possible, local authorities should look to deliver housing through large scale regeneration projects, urban extensions or new settlements, as opposed to smaller infill developments</li> </ul> | Policy SR2 sets out requirements for circumstances where development is concentrated in large units.   | Policy SR2 revised to cover major developments in MUAs and other areas where development is concentrated, as well as settlements of significant development | 27/9/07 |
| <ul style="list-style-type: none"> <li>focus developments in areas where public transport is available or can be delivered</li> </ul>   |  | See Chapter 9   | 27/9/07 |
|   | Agree  | Policy SR2 F now refers to provision of public transport infrastructure   | 27/9/07 |
| <ul style="list-style-type: none"> <li>create pedestrian and cyclist-focussed developments, ensuring that transport serves rather than dictates the form of development</li> </ul>  | Policy SR2 F gives priority to low carbon forms of transport such as walking and cycling   | No change   | 27/9/07 |

<sup>1</sup> As an example, the Climate Change Action Plan for London has established a target of reducing CO2 emissions by 60% by 2025 (based on 1990 levels), which is broken down by sector (eg domestic, ground based transport etc)

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| <ul style="list-style-type: none"> <li>require that long-term flood risks are not increased, eg by not locating development in flood zones</li> </ul>   | Policy SR1 requires all development to be avoided in flood zones. Policy SR2 refers to infrastructure for flood risk management   | No change  | 27/9/07 |
| <ul style="list-style-type: none"> <li>provide sufficient greenspace/urban forest to deal with the likely increases in ambient summer temperatures in urban locations (eg reduce the urban heat island effect)</li> </ul>   | Policy SR1 requires enhancement and extension of natural habitats to amongst other things reduce heat islands. Policy SR2 E covers green infrastructure to provide full range of environmental services | No change  | 27/9/07 |
| <ul style="list-style-type: none"> <li>enhance and extend natural habitats and create new assets, to help protect biodiversity from the likely effects of climate change</li> </ul>   | Policy SR1 requires enhancement and extension of natural habitats. Policy SR2 E covers green infrastructure to provide full range of environmental services, including adaptation                       | No change  | 27/9/07 |
| <ul style="list-style-type: none"> <li>establish new biodiversity assets and infrastructure, which is already discussed in the policy on Climate Change which requires that natural habitats and enhanced and extended</li> </ul>   | Policy SR2 E covers green infrastructure  | No change  | 27/9/07 |
| <ul style="list-style-type: none"> <li>provide affordable housing to meet relevant targets</li> </ul>   | Agree   | Policy SR2 A revised to include the provision of affordable housing  | 27/9/07 |
| It is noted that this policy does not contain any targets or standards, and as such is open to wide interpretation by local authorities. It is strongly recommended that CABE/HBF 'Building for Life' standard is adopted and applied to all relevant developments, with the requirement that all such developments meet at least the 'good' standard. (This standard has been adopted by CLG for all developments in the Thames Gateway.)  | Agree, but more appropriate within Policy SR3   | Policy SR3 expanded to include new clause A requiring development to meet CABE Building for Life standards | 27/9/07 |
| <b>Policy 3: Sustainable Design and Construction</b>  |   |  |         |
| It is recommended that the policy is simplified, primarily by requiring up front that the 'good' standards from West Midlands Sustainability Checklist for Developments are required for all developments greater than 10 dwellings or 5,000m <sup>2</sup> , and then by adding any additional standards that are not covered by the Checklist such as those on energy efficiency, water efficiency, renewables etc. Furthermore, where the policy requires a higher standard than that required by the Checklist, it should be explained that the higher standard would be applied | Policy SR3 seeks to achieve minimum standards, but could require good standards   | Policy SR3 A amended to require at least Sustainability Checklist for Development good standards           | 27/9/07 |
| On energy, the policy looks for Local Authorities to promote energy efficiency in existing housing stock, but does not set out specific requirements. Given that 83.7% of the region's housing stock will be pre-2006 in 2026, it is recommended that more specific and detailed proposals are developed to ensure that old   | Setting of specific requirements is beyond the scope of RSS. Policy SR3 I promotes improvements, but these will have to be delivered by other mechanisms  | No change  | 27/9/07 |

| Recommended change  | Comment   | Response   | Date    |
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| housing stock is retro-fitted for energy efficiency.  |   |  |         |
| On water use, the policy could require that new buildings achieve higher water efficiency standards, eg Level 5 (80 litres/person/day). In addition, the policy could require the 'good' standard from the Checklist on water, ie 25-50% of domestic water use in operation to come from rainwater collection and/or grey water recycling schemes.  | The Environment Agency supports level 3 and 4 of Code for Sustainable Homes, but not level 5 due to the expense. Agency has concerns about grey water recycling due to cost and intensive energy requirements | No change, but WMRA could support Environment Agency in establishing exemplar projects to secure greater efficiency and community scale grey water recycling schemes | 27/9/07 |
| On use of materials, the policy could be strengthened by requiring that 10% of the cost of all materials (not just minerals) used is from recycled/reused content. In addition, the policy could apply the 'good' standard recycled materials for roads, pavements etc (ie 25-30%) and for low environmental impact materials (60-80% Green Guide A rated).   | Inclusion of financial thresholds not appropriate in RSS. Policy SR3 F sets target of at least 25% of total minerals used from recycled/reused sources  | No change  | 27/9/07 |
| On communications, the policy could apply the 'good' standard from the Checklist on virtual communications, that infrastructure is in place to allow for broadband, or that satellite broadband is installed  | Not relevant to Policy SR3, which relates to sustainable design and construction  | No change  | 27/9/07 |
| On transport, the policy could be strengthened by applying the 'good' standards from the Checklist, ie: <ul style="list-style-type: none"> <li>on pedestrian movement, that a design strategy is in place to address four key aspects of a high quality public realm and a pedestrian friendly environment</li> <li>on building frontages, that 100% of frontages achieve Grade C of the Active Frontages Guidelines, and 25% achieve Grade A</li> <li>on virtual communications, that infrastructure is in place to allow for broadband, or that satellite broadband is installed</li> <li>on public transport, that occupiers will have to walk no further than 1000m to access public transport which offers a regular link to a local town centre or service centre</li> <li>on waiting areas, that shelters are provided</li> <li>on parking, that less than the Local Authority standard is applied alongside parking restraint measures</li> <li>on cycling and walking, that key facilities are served by cycle routes and have secure storage</li> <li>on car clubs, that feasibility studies are done on whether it is possible to establish a car club</li> <li>on street design, that design is focused on road traffic accident reduction</li> </ul> | Too detailed for Policy SR3   | No change  | 27/9/07 |
| On provision of facilities, the policy could be strengthened by   | Too detailed for Policy SR3. More   | No change, but consider as part of Phase   | 27/9/07 |

| Recommended change   | Comment   | Response  | Date    |
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| applying the 'good' standards from the Checklist, ie that (a) a shop selling food and fresh groceries (b) a post box and (c) a childrens' play area are available to all dwellings, on pedestrian and cycle routes and around public transport nodes   | appropriate to UR and RR policies   | 3 revision  |         |
| On renewables, given that the RSS covers the period to 2026, the policy could include higher targets for incorporating renewable and low-carbon energy for further on in the plan period, eg 25% by 2016 etc.  | This is a valid suggestion, but lack of evidence to justify higher targets later in period  | No change, but enhance evidence base as part of Phase 3 revision or next RSS review | 27/9/07 |
| On climate change adaptation, the policy would be strengthened if the 'good' standard on heat island effects was required (ie that a design strategy to address key aspects of heat islands was developed).  | Issue covered in Policy SR1 B. More appropriate to detailed QE policies on green infrastructure   | No change, but consider as part of Phase 3 revision                                 |         |
| On environmental assets, the policy would be strengthened if the following 'good' standards were required: <ul style="list-style-type: none"> <li>on landscapes, that schemes are drawn up with a landscape architect and with input from a Landscape Character Specialist</li> <li>on public green space, that 100% of dwellings are within 500m of green space where children can play</li> <li>on recreation, that the development meets DCLG Good Practice Guidance on 'Developing Accessible Play Space'</li> </ul>                                       | Too detailed for Policy SR3. More appropriate to QE policies. RSS already refers to English Nature (now Natural England) accessible greenspace standard | No change   | 27/9/07 |
| On biodiversity, the policy would be strengthened if the following 'good' standards were required: <ul style="list-style-type: none"> <li>on determining biodiversity assets, that a survey and mitigations/harm avoidance strategy is carried out</li> <li>on maintaining/enhancing biodiversity assets, that there is an increase in ecological value/support for at least one habitat or species</li> <li>on linking populations and habitats, that links to 2 habitats are provided</li> <li>on native trees and shrubs, that 60-90% are native</li> </ul> | Too detailed for Policy SR3. More appropriate to Policy QE7   | No change, but consider as part of Phase 3 revision                                 | 27/9/07 |
| On pollution, the policy would be strengthened if the following 'good' standards were required: <ul style="list-style-type: none"> <li>On noise pollution, that key sources are identified and plans drawn up to mitigate against noise sources</li> <li>On light pollution, that 100% of lighting is low powered street lighting with limited upward light transmission</li> <li>On low environmental impact materials, that 60-80% of building materials by mass are Green Guide A rated</li> </ul>  | Too detailed for Policy SR3. More appropriate to Policy QE6   | No change, but consider as part of Phase 3 revision                                 | 27/9/07 |
| On community involvement, the policy could be by the   | Not appropriate for RSS. Public   | No change   | 27/9/07 |

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| <p>application of 'good' standards from the Checklist, eg</p> <ul style="list-style-type: none"> <li>on public involvement in design, that local community stakeholders have been asked to choose their preferred option from a range of schemes and that this option has been put forward</li> <li>on ongoing public involvement, that this is actively marketed to potential occupiers/owners</li> </ul>  | <p>involvement is matter for LDFs and is set out in local authority statements of community involvement</p>  |            |         |
| <b>Chapter 6: Communities for the Future</b>  |  |            |         |
| <b>Policy H1: Housing within the Major Urban Areas</b>  |  |            |         |
| No recommendations at this stage.   |  |            |         |
| <b>Policy H2: Housing beyond Major Urban Areas</b>  |  |            |         |
| No recommendations at this stage.   |  |            |         |
| <b>Policy H3: Level and distribution of new housing development</b>   |  |            |         |
| <p>Environmental impacts: many of the environmental impacts which could arise from this level of housing growth can be mitigated by applying high standards of design and construction (ie through the sustainable communities and construction policies), in particular water use and wastewater discharge issues, CO2 emissions, local transport and congestion, impacts on local environmental and historic assets. Issues around the potential use of greenfield sites (and greenbelt) could be addressed by density policies (H7) and by policies in the Quality of the Environment chapter which will be part of the Phase 3 revision. Recommendations are made elsewhere (ie Sustainable Communities and Sustainable Design and Construction) on how these environmental pressures and impacts can be reduced.</p> | <p>Now policy CF3.</p> <p>Issues are dealt with by sustainable communities and sustainable construction policies.</p> <p>For comments on density policies see response to H7.</p>  | No change. | 21Sep07 |
| <p>Urban renaissance: Unless a greater proportion of the overall housing total is located in the major urban areas, then it seems likely that the region will experience ongoing out-migration from these areas and a decline in their housing markets. While in theory it makes sense to locate additional housing in the areas of significant development, many of these towns appear to have major constraints (eg transport, green belt, water infrastructure, possibly flood risk) and it will be necessary to deliver that infrastructure before or at the latest alongside the housing for these towns to develop as self-sustaining and sustainable settlements.</p>  | <p>Policy CF3. A balance of development across the Region is required. Social and economic considerations as well as deliverability need to be considered in relation to the level of allocations in the major Urban Areas – policy CF3 is considered to address these issues.</p> | No change. | 21Sep07 |
| <p>It is also recommended that housing figures for non-MUA districts are established as maxima, to limit more effectively the number of houses built in these areas</p>   | <p>This suggestion is contrary to Government requirements to increase levels of housing development and maintain a flexible supply</p>   | No change. | 21Sep07 |

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| Policy H4: Phasing of new development   |  |            |         |
| it is recommended that policy H4 takes a more radical approach to phasing, by ensuring that a much greater proportion of housing is delivered in the MUAs for the first 10 years of the strategy. For example, if the original objective of a ratio of 1:1 was delivered in the first half of the strategy period, this would mean the construction of 95,750 additional dwellings in the MUAs by 2016 (compared to 83,000 in the current strategy), and 95,750 outside the MUAs (compared to 104,500 in the current strategy). If the more radical ratio of 1:0.7 was delivered, this would mean the construction of 110,300 additional dwellings in the MUAs by 2016 (compared to 83,000 in the current strategy), and 77,200 outside the MUAs (compared to 104,500 in the current strategy)  | Policy CF4. The phasing policy already implies an increase, in the short term, in housing completions of 16% in the West Midlands conurbation – a level which will require considerable public investment, particularly in land assembly and reclamation. The very fragile housing market in the North Staffordshire conurbation and the desire to concentrate new housing development in the early years of the plan period into the urban core to kickstart regeneration in these areas requires a lower level of new housing development in the short term.   | No change. | 21Sep07 |
| Policy H6: The reuse of land and buildings  |  |            |         |
| The policy could also include reference to the encouragement of the reuse of buildings, or this issue could be addressed in the policies on sustainable construction and sustainable communities.   | This is covered in policy CF5.   |            | 21Sep07 |
| Policy H7: Making efficient use of land   |  |            |         |
| It is recommended that the policy establishes a region-wide minimum density rate (eg 40 dwellings per hectare), and an overall density target rate for the region as a whole (eg 45 dwellings per hectare).<br>Clearly higher density development will have some positive implications for the region as a whole – reducing pressure on land in districts where these resources are scarce, reducing the likelihood of development in flood risk areas, in greenbelt, close to environmental and heritage assets etc. In addition, at local levels, higher density developments can be important in urban renaissance, can encourage the provision and use of public transport, and the retention and development of social and community facilities close to where they are needed (as the supporting text suggests). High density developments can also be designed to overcome the potential environmental problems that may arise, eg reducing pressure on waste water treatment infrastructure through water efficiency, mitigating urban heat | Policy CF6.<br>Agree that high density developments can be important in encouraging urban renaissance and maintaining services. However, the requirement for a particular range of densities needs to be considered though local housing assessments and Local Development Documents, given the very different circumstances in different parts of the Region. There is a need to balance social and economic requirements in local areas against environmental issues. Family housing with small gardens is considered to be the most flexible form of provision, to meet needs at different life stages. Gardens can also slow rate of water runoff. A regional level target, as | No change. | 21Sep07 |

| Recommended change  | Comment  | Response   | Date    |
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| island effects through the provision of good quality green spaces, designing space for biodiversity etc. Finally, high density developments do not have to be comprised solely of flats – family housing can be provided at higher densities than has historically been the case without compromising on the number or size of habitable rooms or bed spaces. <sup>2</sup>                            | specified is not considered appropriate.   |            |         |
| <b>H8. Delivering affordable housing</b>  |  |            |         |
| The policy should establish a regional target of 5,140 social housing units and 3,000 intermediate housing units per annum.   | Policy CF7. The target set is 5,300 <u>minimum</u> affordable housing units per annum which includes intermediate housing. This is considered to be consistent with the overall level of development proposed and likely deliverability. However, as the figure is minima, if resources permit (either through s106 agreements or Housing Corporation funding), actual delivery can be higher. (Note: Of the 3000 intermediate housing unit requirement set out in the Cambridge study, one third is already included in the social needs estimate). | No Change. | 21Sep07 |
| The policy could also set targets for intermediate and social housing at housing market area levels, set minimum % targets which all local authorities would be required to achieve (eg 35% affordable housing total, with a minimum of 10% intermediate and 20% social housing), and/or set % targets for developments of specific sizes (eg 35% for developments greater than 1ha or 30 dwellings). | This needs to be considered through local housing assessments and Local Development Documents, given the different circumstances in different parts of the Region.   | No change. | 21Sep07 |
| <b>Policy H9. Delivering mixed communities</b>  |  |            |         |
| While it is acknowledged that the policy highlights the need to provide a range of housing types and tenures within new housing developments, it could also make specific reference to the need to meet the needs of different socio-economic groups within developments, to ensure that new communities do not become pockets of deprivation (ie the process of 'ghettoisation').                    | Policy CF8. This issue is already dealt with within the elements of CF8. Planning policy cannot dictate who lives in a house and therefore the policy cannot go any further than it does at the moment.  | No change. | 21Sep07 |
| <b>Policy H11: Managing housing land supply</b>   |  |            |         |
| No recommendations at this stage.   |  |            |         |

<sup>2</sup> Further information on good practice issues associated with high density development is available in CABE's 2005 report 'Better Neighbourhoods: Making higher densities work' [www.cabe.org.uk/AssetLibrary/2382.pdf](http://www.cabe.org.uk/AssetLibrary/2382.pdf)

| Recommended change  | Comment  | Response   | Date     |
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| <b>Employment land</b>  |  |  |          |
| Add a criterion to policy PA6A that the location of sites should promote sustainable transport behaviour, including that sites are or will be served by public transport.   | The substance of the point is accepted.  | It is considered that this point is addressed by PA1, B(ii) and C(i)   | 27-09-07 |
| Give priority in policy PA6A to locations which are within urban areas (i.e. edge-of-centre or out-of-centre but not out-of-town as defined by PPS6) and accessible or will be made accessible by public transport.   | Not considered to be appropriate when read in conjunction with PA11 although PA6A gives a strong steer towards brownfield first.   | No change required.  | 27-09-07 |
| Ensure a clearer focus in policy PA6A on provision of employment land linked to employment need. Add an additional criterion to policy.   | The policy has been adjusted to reflect the important linkage between new housing and population growth with new employment. The distribution and levels of employment land provision have also taken account of employment need as reflected by the pattern of unemployment. See also existing policy PA2.                    | No further changes required but also note that the linkage of employment land and need is a key factor that LPAs will want to consider in District level development planning.                                       | 27-09-07 |
| Increase the employment land provision in the MUAs in policy PA6A and ensure a better balance for areas of high unemployment and/or high housing growth.  | This factor has been taken into account in setting the levels and distribution of employment land provision.   | No further changes required.   | 27-09-07 |
| Promote employment land in mixed use development  | To create opportunities to increase accessibility and reduce travelling  | It is not considered that a specific policy is required in the RSS.  | 27-09-07 |
| Clarify in supporting text to policy PA6B what is expected to be done if sites have poor quality public transport access.   | <del>It is not clear what the intended outcome of the policy is.</del>   | Employment land reviews will be expected to determine what action(s) are appropriate across the range of sites within a LPAs area. The actions could include responses to improve accessibility by public transport. | 27-09-07 |
| Clarify in supporting text to policy PA6B what is meant by attractive sites, and that it should include high standards of design, best practice in landscaping, use of green infrastructure, supporting local distinctiveness and encouraging biodiversity enhancement (West Midlands Sustainability Checklist for Development) | PA6 defines the portfolio. The higher up the portfolio the more attractive the sites will need to be, especially bearing in-mind the close relationship between environmental quality and economy. PA1 B(v) sets the context for sustainable construction techniques. Other matters considered to be too detailed for the RSS. | No further change required.  | 27-09-07 |
| Include the following as criteria in employment land reviews in policy PA6B: <ul style="list-style-type: none"> <li>the degree to which the employment land supports mixed use and balanced development objectives;</li> <li>whether the site provides employment land near or</li> </ul>                                       |  | Criterion has been added to policy PA6B that where sites have no prospect for employment development, they should be considered for reallocation for mixed use development.  | 23/8/07  |

| Recommended change  | Comment  | Response   | Date     |
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| <p>accessible to the potential workforce;</p> <ul style="list-style-type: none"> <li>whether the site provides employment accessible to deprived communities and supports investment in areas of deprivation;</li> <li>vulnerability to changes in flood risk.</li> </ul>   |  | Other recommendations not yet addressed.   |          |
| Give clearer priority in policies PA7 and PA8 to promoting public transport access to sites, particularly in areas suffering from congestion and from poor air quality.   | Accepted.  | Reflected in PA7 B(iv) and PA8 B (iv).   | 27-09-07 |
| Sites proposed in development plans for RISs and MISs should be required by policies PA7 and PA8 to take account of the potential effects of increased traffic on AQMAs and to mitigate any potential impacts through plans for promoting alternatives to road freight and car use.   | It is anticipated that these points would be covered by existing requirements for SEAs and SA.   | No further change necessary.   | 27-09-07 |
| Include policy in PA9 to require consideration of light pollution, local air quality impacts, existing and future levels of highway congestion and the potential cumulative impact of logistics operations on congestion, compensation for loss of significant value from greenfield development, ensuring access to jobs for areas of deprivation and employment need.   | It is anticipated that these points would be covered by existing requirements for SEAs and SA.   | No further change necessary.   | 27-09-07 |
| <b>Centres</b>  |  |  |          |
| Policy PA11 should require consideration of the potential effects on traffic levels, congestion and air quality, and improvement of public transport to avoid significant effects.  | Accepted   | Text has been added to policy PA11 requiring developments which will generate additional visitor numbers to be accompanied by measures to minimize their potential to create or add to congestion or poor air quality on the highway network.                    | 17/8/07  |
| The policy approach to offices should give a clearer focus to employment need as a factor in allocating office space provision, particularly as the supporting text recognises the need to use office development as a way of diversifying employment opportunities. The supporting text should be reworded to emphasise the importance of providing economic opportunities in areas of high unemployment rather than high employment.              | The distribution of office floorspace between centres has a strong MUA focus (75% in the MUAs) and the need to encourage economic diversification is already recognised.<br><br>No change needed |  | 24/09/07 |
| The policies and supporting text should give a stronger emphasis to the potential transport impacts of office development, particularly in strategic centres. Policy should underline the importance of minimising travel arising from new developments and promoting greater use of public transport in travelling to offices. The policy should require consideration of the potential effects on traffic levels, congestion and air quality, and | Accepted   | Supporting text to policy PA13A now emphasises that the quality of public transport access is important in promoting town centre office development. Policy PA13B requires priority to be given to locations with high levels of public transport accessibility. | 17/8/07  |

| Recommended change  | Comment  | Response  | Date     |
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| improvement of public transport to avoid significant effects.   |  | No requirement to consider the effects of development on congestion and air quality, but the supporting text highlights the need for traffic management measures as envisaged in Chapter 9 Transport and Accessibility. |          |
| Policy should promote mixed use development, and include consideration of potential loss of accessible green space in assessing locations for development.  | Partly accepted                                | A reference to mixed use development has been included in para 7.59. The issue of loss of green space is unlikely to be significant in most centres, and is best addressed through LDFs                                 | 24/09/07 |
| Development under policy PA13C will need to consider the potential impact on road congestion and pollution and could be required to promote the use of public transport to reach casinos.   | Accepted                                       | Reference to public transport included in the policy.   | 24/09/07 |
| The generation of noise and light should also be considered in development control decisions and this could be referred to in the supporting text to policy PA13C as a potentially significant effect.  | This is an issue better addressed through LDFs |   | 24/09/07 |
| <b>Transport</b>  |  |   |          |
| Criteria under policy T6 for location of car parks should continue to include environmental criteria, particularly the potential for impacts on natural and historic assets and including the effects of loss of open space and greenfield land. If necessary, loss of value should be required to be compensated for in development control policy.  |  | Supporting text has been included to highlight that locations should be assessed against criteria in national and RSS policy.<br>No action in response to recommendations on compensation for loss of value             | 23/8/07  |
| To maximise the potential for park and ride schemes to contribute to a reduction in traffic levels, other measures to restrict traffic growth are required in tandem with park and ride such as those encouraged by policies T7 and T8. The RSS should require park and ride schemes to be explicitly linked to a broader package of measures to manage demand. The supporting text should highlight the importance of schemes being able to demonstrate that they support the achievement of more sustainable communities and the objectives of urban and rural renaissance. |  | Park n Ride schemes are intended to provide choice, particularly to centres and as such will be considered in the context of Policies T7 and T8   | 27/9/07  |
| The supporting text to policy T7 could make reference to the need for an assessment of the risks and benefits of reduced parking as well as supply and demand.  |  | Supporting text now makes reference to assessment of risks and benefits   | 23/8/07  |
| Supporting text to policy T7 should clarify how economic and  |  | Reference to addressing social need   | 23/8/07  |

| <b>Recommended change</b>  | <b>Comment</b> | <b>Response</b>  | <b>Date</b> |
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| social need might affect parking provision, noting that reducing congestion and increasing public transport use can help to enhance economic vitality.   |                | through car parking standards has been removed.<br>No clarification yet of the role of parking standards in enhancing economic vitality.   |             |
| The need to protect heritage areas and improve townscapes and the urban environment more generally should be included as a factor in determining parking standards.  |                | Supporting text to T7 notes the potential for car parking standards to contribute to more pleasant urban environments.   | 23/8/07     |
| Policy T8 should require local authorities to take account of the potential environmental and economic benefits of reducing congestion for the areas affected, as well as the potential risks of adverse effects.  |                | Supporting text to T8 now refers to benefits of demand management for sustainable development, climate change and the environment, although not the economic benefits. The policy is now more positively phrased, referring to the need for an assessment of impacts on the environment, economy, communities, renaissance and capacity. | 23/8/07     |
| Policy T11 or its supporting text should highlight the importance of skills development to ensure opportunities are available to areas of employment need and to ensure expansion is not constrained by skills shortages.  |                | Supporting text highlights the importance of linking employment opportunities to areas of need and developing the required skills within the region to enhance the economic benefits of airport expansion.   | 23/8/07     |
| Policy T11 should encourage exploration of the potential for use of rail freight from Coventry.  |                | No change because there are no rail freight facilities at Coventry airport.  | 27/9/07     |
| The policy should require developments to create opportunities for biodiversity enhancement and for the maximisation of benefits from the historic environment where significant impacts are expected.   |                | Supporting text has been added to highlight the need for airport policy to be strongly linked to environment policy and for developments to take full account of sustainable development principles. The RSS contains policy (QE5 and QE7) which promote enhancement of the historic environment and biodiversity.                       | 23/8/07     |
| Developments to support airport expansion could be required to demonstrate good practice in resource and energy efficiency measures, sustainable design and construction and aim to be carbon neutral as recommended by the ATWP Progress Report for example by incorporating renewable energy generation schemes. |                | Policy requires developments to support airport expansion to demonstrate good practice in resource and energy efficiency measures, sustainable design and construction and aim to be carbon neutral.   | 23/8/07     |
| <b>Waste</b>   |                |  |             |
| Waste policy should include a requirement to minimise greenhouse gas emissions from waste management activities,   |                | This would not be locationally specific and therefore inappropriate for the RSS  | 26/9/07     |

| <b>Recommended change</b>  | <b>Comment</b>  | <b>Response</b>  | <b>Date</b> |
|--|---|--|-------------|
| including from transport.  |   |  |             |
| Waste policy should include a commitment to support local/regional processing of recyclate and markets for recycled materials.   | To support minimisation of transport distances  | This would not be locationally specific and therefore inappropriate for the RSS  | 26/9/07     |
| Policy W5 should clarify the accessibility criteria to prioritise location close to the source of waste over end users.  | As currently phrased, the policy does not support communities taking responsibility for their own waste     | This is something which will vary from one waste stream to another and could not be "based on a robust and credible evidence base". (Test of Soundness – 6)  | 26/9/07     |
| Consider removing restriction in policy W6 that alternative non-open sites must be used, where development would not be inappropriate on open land and would be well-located to the source of the waste. | To avoid forcing distant sites to be used when a development on a proximate open site would be appropriate. | Waste development on 'open land' is more likely to have an adverse environmental impact in both visual, noise and air emissions terms, therefore there should be a presumption that waste activities are within buildings. There are however a limited number of waste management activities which are practically or geographically appropriate on open land. | 26/9/07     |
| Provision of sites in rural areas should be considered in terms of overall sustainability impacts and benefits in policy W7.   | Economic impacts should also be considered.   | Planning authorities cannot take 'economic viability' into account therefore the policy goes as far as it can.   | 26/9/07     |
| Include a requirement in policy W12 to promote restoration benefits, for landscape, recreation and amenity and biodiversity.   |   | Landfill of inert material can also facilitate the development of land and therefore bring brownfield land forward. The proposed change would exclude this option.   | 26/9/07     |
| Include requirement in policy W12 for methane capture and energy generation from landfills unless it can be shown that methane will not be generated from the particular landfill site.                  | To reduce a significant source of greenhouse gas emissions and to support best environmental practice.      | This recommendation is based on the premise that biodegradable material will be landfilled and the objective of LATS and the Landfill Tax is to minimise landfill to inert residual material.  | 26/9/07     |
|  |   |  |             |