

West Midlands Regional Assembly

Sustainability Appraisal of Draft Regional Spatial Strategy (RSS) Phase 2 Revision for the West Midlands

FINAL SUSTAINABILITY APPRAISAL REPORT:
Non-Technical Summary

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1 NON-TECHNICAL SUMMARY

1.1 INTRODUCTION

This *Non-Technical Summary* of the *Final Sustainability Appraisal Report* has been produced by URSUS Consulting Ltd, who have been commissioned by the West Midlands Regional Assembly (WMRA) to carry out the Sustainability Appraisal of the Phase 2 Revision of the West Midlands Regional Spatial Strategy.

This *Non-Technical Summary* summarises the findings of appraisal work carried out to assess the effects and implications of the 'Preferred Option and policies', which were submitted to a meeting of the Regional Planning Partnership on 22 October 2007. The full *Final Sustainability Appraisal Report* and detailed technical work are included as Annexes on a CD attached to this *Non-Technical Summary*, as follows:

- Annex A, *Final Sustainability Appraisal Report*
- Annex B, Chapter by Chapter Review of Sustainability Appraisal Findings
- Annex C, Detailed Policy-by-Policy Appraisal
- Annex D, Detailed Analysis of Housing Figures
- Annex E, Audit Trail of Recommendations from the Sustainability Appraisal
- Annex F, Overall Implications of the Spatial Options Paper
- Annex G, Review of Baseline Economic, Social and Environmental Conditions in the West Midlands
- Annex H, Review of Conditions at International Nature Conservation Sites
- Annex I, Review of Policies, Plans, Programmes and Sustainability Objectives
- Annex J, Review of Other Plans and Strategies with Potential for Cumulative Effects

1.2 THE RSS PHASE 2 REVISION AND ITS RELATIONSHIP WITH OTHER PLANS

1.2.1 Context for the Phase Two Revision

The RSS for the West Midlands was published in June 2004, and became a statutory development plan in September 2004. The purpose of the RSS is to guide the preparation of local authority development plans, local waste plans and local transport plans, so that together they can provide a coherent framework for regional development up to 2021.

When the RSS was published, the Secretary of State supported the vision and objectives of the strategy, but suggested that several issues needed to be developed further by the Regional Planning Body (the West Midlands Regional Assembly). It was agreed that these issues should be looked at in three phases, as follows:

- *Phase 1, Black Country Study*, a plan for the long-term change and development of this sub-region including the City of Wolverhampton and the Boroughs of Walsall, Sandwell and Dudley, launched in February 2005 and to be submitted to the Secretary of State on 31 May 2006.
- *Phase 2*, including housing needs, urban capacity, employment land, airports, road user charging and waste management, to be launched in November 2005 and submitted to the Secretary of State in June 2007.
- *Phase 3*, including rural issues and significant environmental issues, to be launched in the Summer of 2007 and submitted to the Secretary of State in early 2009.

1.2.2 The Phase Two Revision

The Phase Two revision deals with a number of specific areas of RSS policy. In summary, revisions have been made to policies in the following chapters:

- Chapter 2 adds three new policies to the RSS, covering Climate Change (SR1), Sustainable Communities (SR2) and Sustainable Design and Construction (SR3).
- Chapter 6 sets out policies on new housing provision in the Region and has been fully revised in Phase 2. Policy CF3 makes a net provision for 365,600 new dwellings, and sets out how those will be distributed by District or Unitary Authority – aiming to focus development in the the Major Urban Areas (MUAs) of Birmingham/Solihull, the Black Country, Coventry and North Staffordshire and in larger towns ('Settlements of Significant Development') which are capable of accommodating growth – Shrewsbury, Telford, Burton upon Trent, Newcastle urban area, Stafford Town, Rugby Town, Redditch Town, Worcester and Hereford. The delivery of new housing is split into two phases, up to 2016 and 2016-2026, under policy CF4. The chapter also contains policies to deliver affordable housing, to ensure the development of balanced, mixed communities, and to secure the efficient use of land by prioritising brownfield land and by promoting the use of appropriate densities.
- Chapter 7 sets out policies on the provision of employment land, retail and office space. It aims to focus employment land growth in the MUAs in accessible locations which reduce worklessness and protect and enhance environmental and cultural assets. Locations are proposed for Major Investment Sites and Regional Logistics Sites, and broad areas for Regional Investment Sites. Chapter 7 also sets out a hierarchy of towns and cities for the focus of new office and retail development. These strategic centres are split into four tiers indicating broadly their ability to accommodate growth.
- Chapter 8 contains a series of policies which aim to ensure that development protects and enhances environmental assets, including natural, built and historic assets. It also sets out policies on development relating to energy, minerals and waste. Phase Two substantially revises the waste policies.
- Chapter 9 sets out a strategic framework of policies on transport and accessibility within the region. Phase Two revises selected policies within the chapter. It amends the policy dealing with the provision of sites for strategic park and ride facilities including identifying potential locations and

criteria. It also revises the criteria for setting maximum parking standards in new development, and for the introduction of demand management schemes. Phase Two also revises the policy on development in support of airport expansion following the review of the Air Transport White Paper. Regional transport investment priorities have also been revised to include schemes to support housing growth in the Region's major cities and towns.

1.2.3 Relationship with Other Plans and Programmes

The RSS sets out the land use and spatial policy for the West Midlands Region. As such, it must take account and reflect national land use planning policy as set out in national legislation and planning policy guidance and statements. It should also seek to reflect national policy on a range of issues as set out in statements of policy such as national strategies and White Papers.

The RSS also seeks to give spatial effect to other regional strategies and policy objectives. It aims to facilitate the developments which are required to support regional economic development, and therefore aims to support the economic development priorities and objectives as set out in the Regional Spatial Strategy. The RSS also seeks to implement the Regional Housing Strategy, and to incorporate policies which effectively constitute a Regional Transport Strategy and a Regional Waste Strategy.

The RSS sets the framework for lower tiers of planning, and Local Development Documents and Local Transport Plans are required to be compliant with the policies within the RSS.

1.3 THE CURRENT STATE OF THE ENVIRONMENT, ECONOMY AND SOCIETY

The report sets out data which describes the current state of the environment, economy and society and shows trend data where this is available. The key issues are summarised below.

Table 1.1 Summary of the Current State of the Environment, Economy and Society

Issue	Current State and Trends
Access to services and opportunities	Data on access to key services in rural areas suggests that, for many services, provision of services to rural communities in the West Midlands is worse in relative terms than the England average, particularly for ATMs, banks and building societies, doctor's surgeries, supermarkets, primary schools, Post Offices and pubs
Participation	There is a wide range of election turnout ranges, with many urban constituencies well below 50%.
Poverty	Very low household incomes in parts of Birmingham, Sandwell, Stoke on Trent and Coventry, as well as in the remote rural parts of Herefordshire and Shropshire. A significant reduction in the numbers of households having to spend more than 10% of their income on fuel, but the Region has the second worst rate in England.
Health	Average life expectancy is only slightly below the UK average, but there is significant intra-regional variation particularly for local authority areas with higher levels of deprivation. Infant mortality rate is worse in the region than anywhere else in England, while the National rate is itself high compared to many other EU States.

Issue	Current State and Trends
	There are relatively high rates of long-term limiting illness within the Region as a whole, and some extremely high rates in specific deprived communities.
Housing	<p>Gross completions since the beginning of the RSS (2001-2005) have been 4% above targets in the RSS (66,720). At sub-regional level: Dudley, Staffordshire, Telford and Wrekin, and Herefordshire are all below target. Net completions are almost exactly in line with RSS targets at a regional level, although 11% above target in Major Urban Areas and 4% below in other areas.</p> <p>The West Midlands has the highest rate of dwellings not meeting the Decent Homes standard of any Region.</p> <p>Regional housing has become increasingly less affordable, as measured by the affordability index. Intra-regional differences indicate the effects of in-migration on housing markets, particularly in rural communities. Lower average earnings and increasing demand have resulted in housing in Hereford and Worcester becoming the least affordable in the region. Parts of Birmingham, Coventry, the Black Country and Stoke-on-Trent are faced with the opposite problem of low demand.</p>
Crime	Crime rates are broadly similar to those for England as a whole, but rates are 20-30% higher in metropolitan areas than in the shires. The region has the second highest violent crime rate in England (behind London).
Culture & recreation	<p>Proximity of access to woodland is well below the recommended levels by The Woodland Trust and English Nature. Significant levels of woodland creation would be required to achieve the recommended levels.</p> <p>Participation in cultural visits are lower than the England average although have increased in recent times</p>
Balanced development	There has been an overall decline in the population of the conurbations of 119,000 since 1981, and an increase of 236,740 in the rural and 'other urban' parts of the Region. There is significant intra-regional migration from the conurbations to the region.
Environmental assets	<p>The West Midlands has some of the most heavily urbanised areas in the country, and also some of the most remote and tranquil countryside. Environmental assets are at risk in specific locations within the Region.</p> <p>Although 58% of the Region's landscape has not changed, the Region actually has the highest proportion of landscapes which show marked changes that are inconsistent with existing character descriptions.</p> <p>The Region has a higher proportion of Grade I and II* Listed Buildings and SAMs at risk than elsewhere. A third of the buildings are in immediate risk of further rapid deterioration or loss of fabric compared to a fifth nationally. The total cost of repair, and, where appropriate, conversion of these buildings to their optimum viable use is estimated to be £61.8 million.</p>
Biodiversity	<p>Bird species provide a good indication of the state of wildlife in the countryside, and on this measure the West Midlands is doing better than England as a whole. More species of both woodland and farmland birds are increasing than decreasing, although overall populations have declined somewhat since 1994.</p> <p>The West Midlands is still some distance off the national target for SSSI status. However, the overall trend is positive.</p> <p>West Midlands contains 15 SACs, 2 SPAs, 2 Ramsar sites. Other sites outside the region may also be affected by developments: 4 SACs, 2 pSACs, 2 SPAs, 2 Ramsar sites. Many sites are under pressure from human activities and a number are already adversely affected. Developments within the West Midlands region, particularly from increased housing, population and economic growth, may lead to increased pressure on these sites and may cause adverse effects.</p>
Land Use	<p>There has been only a marginal reduction in the area of derelict land and only small amounts being reclaimed. Whilst the general trend remains in the right direction, the amount and proportion of derelict land reclaimed since 2001 has been relatively small.</p> <p>Housing densities in the West Midlands are the second lowest among all the English regions, although there has been a strong increase from 24/ha in 2000.</p>

Issue	Current State and Trends
	Figures from the Annual Monitoring Report suggest that, during 2004-2005, 82% of housing completions were on PDL.
Pollution	<p data-bbox="579 215 1407 266">Air quality is generally lower in urban areas and (for NO₂) along transport corridors. Rural parts of the region enjoy very good ambient air quality.</p> <p data-bbox="579 277 1407 360">AQMA's have been declared in a number of urban areas, mainly for NO₂ but in a small number of cases for PM10. The whole of Birmingham and Wolverhampton, and much of the M6 corridor, has been declared an AQMA.</p> <p data-bbox="579 371 1407 512">There have been improvements in water quality since 1990. Chemical water quality is now in line with the England average, but biological water quality still less than the England average. Low water quality tends to be located in urban areas, particularly the watercourses in Birmingham, Solihull, Stoke on Trent, Coventry, the Black Country.</p> <p data-bbox="579 524 1407 600">Central and eastern parts of the Region are becoming increasingly light saturated, although the remote rural western parts of the Region are still within the darkest classification band for light saturation.</p>
Climate change	<p data-bbox="579 611 1407 663">West Midlands Energy Strategy states that the Region emitted 42m tonnes of CO₂ in 2002.</p> <p data-bbox="579 674 1407 757">Figures suggest that the Region produces more CO₂ per head than the average for the UK as a whole. In 1999, 32% of emissions arose from road transport, which is the fastest growing source.</p> <p data-bbox="579 768 1407 936">In relative terms the region does not have a large area of land vulnerable to flooding, and few new houses are being constructed on this land. However, the incidence of flooding has been increasing in the Region with more frequent wetter periods associated with global warming. This is exacerbated by the use of drainage systems that are designed to discharge surface water into watercourses more quickly.</p>
Energy	In 2002, the West Midlands was generating 2% of its electricity requirements from renewables, compared to a target of 5% by 2010.
Efficiency	<p data-bbox="579 1010 1407 1093">Aggregate production continues to take place in vulnerable environments. 14% of crushed rock was extracted from sites within AONBs and 38% was from SSSIs, while 44% of sand and gravel was from sites in the Greenbelt.</p> <p data-bbox="579 1104 1407 1184">In most parts of the Region river abstraction levels are committed to their sustainable limits with no surplus water available in summer when demand is highest</p> <p data-bbox="579 1196 1407 1272">The increase in single-person households, long-run changes in the structure of the population, and increasing affluence (and demand for water using appliances) will cause increased water demand per person.</p>
Transport	<p data-bbox="579 1283 1407 1397">Road traffic and congestion is growing. The Annual Monitoring Report 2004 shows that, 'the West Midlands, London and the South-East generally experienced the largest decreases in average speeds on trunk roads between 1995 and 2003.</p> <p data-bbox="579 1408 1407 1547">People in the West Midlands made more trips than all other Regions except the South West in 2004. The proportion of journeys by non-car means in the West Midlands is well below the England average, and has fallen steadily in recent years. The average distance travelled per person per year continues to increase in the West Midlands, as it has nationally.</p>
Waste	Domestic waste generation levels are high and rising. The percentage of waste disposed to landfill has steadily decreased since the mid-1990s, and the Region now landfills less of its waste than any other region, as incineration (energy from waste) capacity has been increased. Recycling and composting is still a very small aspect of the waste management infrastructure in the Region, and is only growing slowly. The region's landfill capacity is due to run out in seven years' time.
Growth	The West Midlands is in a middling group of regions in terms of prosperity, both in the current (15 country) European Union (38th of 73) and UK (6th of 12). The gap in GVA per head between the Midlands/North of England and the South/East of the country is growing.

Issue	Current State and Trends
Employment	<p>Over the last 10 years, as new jobs have been created in the region, the unemployment rate has declined steadily, approaching levels generally regarded as representing full employment.</p> <p>According to the State of the Region Report 2004, 'there will be a very significant shift in sectoral employment patterns, as over 100,000 jobs are lost from manufacturing by 2010 but over 130,000 new jobs are created in the service sectors, representing a net increase of 34,000 jobs'.</p> <p>At a regional level the unemployment claimant rate is around 3%, but there are three wards with rates in double figures (Aston, Sparkbrook and Soho in Birmingham), and a total of 44 wards, all in the former West Midlands metropolitan county, with rates over 5%.</p>
Investment	The West Midlands is 7 th out of 9 English regions in terms of total R&D spending, and spending per head of population.
Skills	The West Midlands has slightly higher rates than the English average for poor literacy and poor numeracy. Thirteen out of the 34 local authorities are ranked in the bottom 2% in England for skills deprivation.
Innovation	There has been an increase in the number of VAT registrations over the decade to 2004, and the proportion of new businesses surviving 12 months is now at the England average.
Responsibility	The West Midlands has the second lowest level of volunteering (with London) of all the England regions, and volunteering rates have declined slightly in recent years whereas levels across England in general are increasing.

1.4 THE ENVIRONMENTAL CHARACTERISTICS OF AREAS LIKELY TO BE SIGNIFICANTLY AFFECTED

A number of specific areas in the Region will accommodate substantial levels of new housing development. Employment land allocations will also be largely be focused in these areas. However, other centres outside these areas are designated for areas of retail growth, and yet other towns are identified as potential locations for waste treatment facilities of a regional or sub-regional nature. Furthermore, there are some local authorities within the region, including some rural areas, which are allocated levels of housing growth which would constitute a significant increase over current numbers, and therefore could be said to be significantly affected by the revision.

The significant effects of the Phase Two revision will therefore be spread very widely throughout the region. In addition, this does not take into account the sensitivities of the receiving environment: some areas may not be identified to take significant levels of development, but the receiving environment may be such that the effects will nevertheless be significant. It is therefore considered that the whole region should be regarded as likely to be significantly affected by the Phase Two proposals. The characteristics are summarised in *Table A4.7* of the main report and set out in more spatial detail in *Annexes F and G*.

To assess more clearly the main areas likely to be significantly affected and the key issues in each area, a sub-regional analysis has been undertaken and more details are provided in the main report.

1.5 EXISTING PROBLEMS RELEVANT TO RSS

The report reviews data and information from a number of sources to identify a list of key sustainable development issues in the West Midlands. These are

issues which both the RSS Revision process and the Sustainability Appraisal needs to bear in mind and address.

Economic Development

Whilst the region's economy has performed reasonably well over the last four years, its relative economic position within the UK and Europe remains static. The region needs to develop high growth and high value added industry sectors, increase overall levels of productivity and narrow the GVA (Gross Value Added) gap between the best and worst performing parts of the Region. It must do this by improving skills levels and ensuring that infrastructure keeps pace with businesses needs.

Housing

The Region faces a longer-term failure in the housing markets to provide many people with housing they want which has resulted in little or, in some cases no substantial range of choice whether in price or type. Housing affordability is a key problem facing the region. Areas with particularly acute affordability problems include South Shropshire, Herefordshire, Malvern Hills, North Shropshire, Wyre Forest, Stratford on Avon and Birmingham.

Urban Renaissance

Over the last 20 years an average of around 20,000 people moved from the conurbations to the rest of the region each year, with 12,000 moving the other way. Many of the people leaving are the most economically active. This outward movement is associated with an increasing return flow of commuting into urban areas, and a fall in 'self-containment' in the Region's towns. Past efforts at regeneration have often failed to provide urban areas which are attractive to a broad range of people's expectations and lifestyles.

Rural Renaissance

Rural areas cover four fifths of the territory and contain one fifth of its population. There is great diversity within these rural areas which must be recognised and addressed. Some rural areas are heavily influenced by proximity to and functional linkages with MUAs and share some of their characteristics. The remoter areas have distinct needs partly arising from high levels of deprivation and low population densities.

Sustainable Communities

Locations for housing growth need to be durable places where people want to live, designed and planned at an appropriate size, scale, density and mix, accessible to employment, with services and other opportunities, green infrastructure and good public transport. The RSS needs to ensure that development does not have significant detrimental effects on existing settlements, and to ensure that developments enhance the form and function of these settlements by creating better places to live, work and visit.

Transport

Transport has been identified as the single greatest challenge for the West Midlands out of all those covered in the RSS. The region's network is diminishing in its ability as a whole to cater for the range of demands placed upon it, leading in particular to increasing congestion in the MUAs and on the strategic transport corridors. Journey distances are increasing as homes, work and services become more dispersed. Accessibility by public transport has been declining because of this, and it has also become relatively more expensive compared to car travel. People in the West Midlands use cars for a greater percentage of miles travelled than any other region. Economic growth in the region needs to be de-coupled from increases in road travel and congestion. Access within and across the region needs to be improved in a way that supports the Spatial Strategy, reduces the need for travel, expands travel choice, tackles congestion, improves safety and protects the environment.

Water Resources

In some areas, the region's water supplies are currently in deficit, ie there is not sufficient to meet demand under all conditions. A recent Environment Agency study concluded that future growth would place additional pressure on water resources in many areas, although water efficiency measures would reduce the pressures on supplies, cutting deficits and delaying the need for new water resource developments.

Climate Change

Climate change is recognised as one of the greatest threats facing the world, with climate models indicating that the West Midlands will continue to get warmer with wetter winters and drier summers. Within the West Midlands, climate change impacts will for example affect the availability/supply of and demand for water resources. Achieving the national targets for reducing greenhouse gas emissions will be a challenge that must be addressed not only at the international and national level, but also through regional efforts. The region also needs to take steps to adapt to predicted changes in climate.

Flooding

The West Midlands region remains one of the most susceptible to flooding, notably on the Severn and Avon¹. Some 62,000 properties are at risk, with flood warnings becoming a more common event². The incidence of flooding has been increasing in the Region with more frequent wetter periods associated with global warming. The severity of flooding is further exacerbated by the use of drainage systems that are designed to discharge surface water into watercourses more quickly.

¹ *Enriching Our Region: An Environmental Manifesto for the West Midlands*, West Midlands Regional Sustainability Forum, 2005

² *ibid*

Environmental and Historic Assets

Quality of the environment is a key aspect of the Spatial Strategy. The region's countryside character, natural areas and historic landscapes are important assets that need to be preserved and enhanced where possible. The level of development proposed by the Preferred Option and policies is likely to have impacts on these environmental assets, both natural and historic, depending on where development is located and how it is developed.

Biodiversity

The Region's plants and animals have suffered major declines in recent decades, and there are continuing pressures from changing land uses and more indirect factors such as climate change. The Region is endowed with a large number of sites sufficiently important to justify being designated for their value, including a range of sites which are of international importance. Growth and development in the Region had the potential to affect these sites in a variety of ways, and in addition can also affect internationally important sites some distance from the Region. It is a legal requirement that the RSS ensures that there are no significant adverse effects on these international sites. The issues affecting sites of international importance are described in *Table A4.8* of the main report.

Land Use

The RSS will have a major impact on land use in the West Midlands. It will be important to ensure that land is used in the most effective way, to maximise its potential, whether it is used as a location for housing, economic activities, infrastructure, recreation and leisure, environmental services etc. It will be important to maximise use of brownfield sites, to safeguard greenfield sites and green belt land and to ensure that contaminated land is remediated.

Waste Management

There are strong financial, legal and environmental imperatives to reduce the amount of waste which is landfilled across all waste streams, to reduce the amount of waste which is generated, to increase the amount of waste which is recycled or composted and to recover resources including energy from as much of the remaining waste as possible. Sustainable waste management also means reducing the distances which waste is transported and communities taking responsibility for the waste which they generate rather than passing the problem on to others. In the West Midlands, recycling rates for household waste are low and there is a significant need for additional recycling and recovery capacity.

1.6

SUSTAINABLE DEVELOPMENT OBJECTIVES RELEVANT TO THE RSS

A Sustainability Appraisal Framework has been developed for the SA of the Phase Two Revision. This has been designed to set out questions that could be used to 'interrogate' options and draft policies, to:

- ascertain whether and how specific sustainability issues are being addressed; and
- understand the environmental, social and economic implications of options and proposals.

The Framework is based on the 29 regional sustainable development objectives set out in the Regional Sustainable Development Framework. These are taken as the objectives for the Sustainability Appraisal. This has been further developed to incorporate the full range of sustainable development objectives which are relevant to the RSS, by developing a set of core and subsidiary questions. The questions reflect an understanding of:

- the RSS vision, challenges and objectives, and the objectives and tasks developed for the Phase Two Revision;
- objectives and targets identified through the review of plans and strategies;
- baseline conditions within the Region; and
- key sustainability issues in the Region.

The appraisal questions are set out in the table below. Further details are given in *Sections A4.2 and A4.6* of the main report as to how the framework was developed and how sustainable development policy objectives were incorporated into the framework.

Table 1.2 Sustainable Development Objectives within Appraisal Framework

RSDF Objective: Will the option/proposal....
1. Sustainable Consumption and Production
1.1 Use natural resources such as water and minerals efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment?
promote the balance of water supply and demand?
reduce the use of primary aggregates?
1.2 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives?
secure improvements to communication infrastructure?
1.3 Promote and ensure high standards of sustainable resource efficient design, construction and maintenance of buildings, both new build and existing stock, where possible exceeding the requirements of the Building Regulations?
ensure the adoption of sustainable design and construction practices in all buildings?
1.4 Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents, and improve health through increased physical activity?
promote more sustainable transport patterns in areas suffering from congestion?
promote a shift of freight from road to rail?
Improve the quality of transport infrastructure?
make best use of existing airport capacity?
1.5 Ensure development is primarily focused in the major urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car?
focus development in the major urban areas?
reduce the number and length of journeys made by car?
reduce the need to travel?
promote alternative, more sustainable, modes of transport to the car (including walking and cycling) through location of housing, employment sites, services and facilities, and appropriate infrastructure for sustainable modes of transport?

RSDF Objective: Will the option/proposal....
1.6 Encourage and enable waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream, including the use of recycled materials where possible?
reduce waste arisings?
ensure that sustainable waste management can be carried out in the Region?
enable communities to take responsibility for their own waste and meet their own needs (self-sufficiency)?
1.7 Encourage local sourcing of food, goods and materials
1.8 Reward efficient resource use and encourage development of alternative and renewable resources in order to reduce dependence on fossil fuels?
See also questions under Objectives 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.9, 2.1, 2.2, 2.3, 3.4 and 4.5
1.9 Encourage corporate social and environmental responsibility, with regional organisations and agencies leading by example?
encourage sustainable procurement?
1.10 Encourage and support a culture of enterprise and innovation, including social enterprise
1.11 Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Region's inhabitants?
narrow the GVA gap between the best and worst performing parts of the Region?
support efficient, competitive, diverse and innovative business, commercial, industrial, retail, tourism and leisure sectors?
2. Climate Change and Energy
2.1 Reduce overall energy use through increased energy efficiency?
raise energy efficiency to current Building Regulations standards in refurbishments for Decent Homes Standard?
2.2 Increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating, and in transportation
promote energy generation from CHP and community heating?
2.3 Minimise the Region's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?
reduce the Region's contribution to climate change?
2.4 Implement a managed response to the unavoidable impacts of climate change, ensuring that the design and planning process takes into account predicted changes in the Region's climate?
promote the adoption of climate change adaptation and climate proofing principles in planning and design?
promote sustainable urban drainage systems?
2.5 Ensure that land use and development takes into account predicted changes in the Region's climate, including flood risk?
prevent all inappropriate development in areas of flood risk?
3. Natural Resource Protection and Environmental Enhancement
3.1 Value, protect, enhance and restore the Region's environmental assets, including the natural, built and historic environment and landscape?
value, enhance and protect the Region's natural environmental assets (eg Green Belt, parks and open spaces, AONBs etc)?
value, enhance and protect the Region's historic environment assets (eg World Heritage Sites, archaeological remains, historic buildings, parks and gardens, and landscapes, and conservation areas, battlefields and other architectural and historically important features and areas, and their settings)?
promote heritage-led regeneration?
promote the repair and reuse of historic buildings?
enhance the amenity value of the countryside, meeting the recreational and leisure needs of communities?
protect, enhance and manage the character and appearance of the region's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place?
3.2 Value, maintain, restore and re-create regional biodiversity, where possible using approaches that improve the resilience of natural systems such as linking fragmented habitats?
value, enhance and protect the Region's designated sites, including sites designated for geodiversity?

RSDF Objective: Will the option/proposal....
value, enhance and protect the Region's priority habitats and species, and promote the delivery of regional biodiversity targets?
support development that incorporates improvements to wildlife habitats?
3.3 Minimise air, water, soil, light and noise pollution levels and create good quality air, water and soils?
promote more sustainable transport patterns in areas of low air quality?
address air quality impacts arising from specific development activities?
protect and enhance the quality of watercourses in the Region?
reduce the quantity of contaminated land in the Region?
prevent noise and light pollution?
3.4 Encourage land use and development that optimises the use of previously developed land and buildings?
3.5 Encourage land use and development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity, and promote local distinctiveness and sense of place
require good urban design to create attractive, high quality environments where people will choose to live, work and invest?
increase access to good quality green space (eg increase the number of people in towns and cities with accessible greenspace within 300m of their homes)?
protect existing and encourage the development of new biodiversity assets in developments?
3.6 Encourage local stewardship of local environments, for example by promoting best practice in agricultural management or enabling communities to improve their neighbourhoods?
3.7 Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation?
specifically improve environmental quality in deprived communities?
4. Sustainable Communities
4.1 Enable communities to influence the decisions that affect their neighbourhoods and quality of life?
promote the use of community-based planning tools?
4.2 Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location
ensure that existing services and opportunities are retained and, where possible, developed?
promote compact, mixed-use developments with good accessibility to local facilities and services that reduce the need to travel?
4.3. Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage?
ensure the provision of employment land in, or accessible to, the most deprived communities in the Region?
4.4 Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services?
diminish inequalities in mortality, health and wellbeing across the Region?
ensure that infrastructure for healthcare is provided to meet projected future demand and need?
promote healthy lifestyles and opportunities for exercise (eg through environmental infrastructure and design)?
promote opportunities to participate in sport?
4.5 Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant local environments?
deliver genuine 'pathways of housing choice'?
increase the supply of affordable housing?
reduce the percentage of unfit/non-decent homes?
encourage housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and seek greater intensity of development at places with good public transport accessibility (such as city, town, district and local centres or around major nodes along good quality public transport corridors)?
promote the renovation and reuse of existing building stock, rather than the construction of new houses, where appropriate?
ensure the adoption of sustainable design and construction practices in housing?

RSDF Objective: Will the option/proposal....
4.6 Reduce crime, fear of crime and antisocial behaviour?
promote the reduction of crime rates?
encourage the adoption of principles to 'design out' crime in housing and employment sites?
4.7 Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the West Midlands can offer locally and in the wider region?
ensure that facilities and locations for cultural activities are protected and provided?
protect and create high quality or valued recreational spaces and avoid erosion of recreational function?
4.8 Encourage physical development with a better balance of jobs, housing, social and cultural services and amenities within each part of the Region in order to meet local needs locally and encourage stable and sustainable communities?
Focus retail and office development in town centres?
link housing development and employment opportunities?
reverse the pattern of people migrating from metropolitan areas to rural parts of the Region?
4.9 Ensure that the Region's workforce is equipped with the skills to access high quality employment opportunities suited to the changing needs of the Regional economy, whilst recognising the value and contribution of unpaid work?
reduce inequalities in employment rates across the Region?
provide employment land near to the potential workforce?
4.10 Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development?
ensure an appropriate supply of employment sites within the region to support sustainable economic development?
Encourage investment to develop deprived areas and focusing resources in areas of greatest need
ensure that education and skills infrastructure meets projected future demand and need?
reduce inequalities in education and skills across the Region?

1.7 **SELECTION OF ALTERNATIVES AND METHODS OF ASSESSMENT**

1.7.1 **Alternatives**

Options for achieving the objectives of the Phase 2 RSS revision were outlined in a report entitled 'West Midlands Regional Spatial Strategy Phase 2 – Spatial Options' (known as the 'Spatial Options Paper'), which was issued for a three month period of public consultation on 7 January 2007.

Three options on housing numbers were proposed for consultation:

- Option 1, 'business as usual', based on a continuation of current RSS policies, with the Shire Districts making use of available urban capacity. This would result in the construction of **381,000 new houses** between 2001-2026;
- Option 2, 'managed growth', derived from advice from and further discussion with the Section 4(4) Strategic Authorities, which would result in a wider spread of development and the construction of **491,200 new houses** between 2001-2026;
- Option 3, 'meeting projected demand', designed to meet predicted housing demand associated with the Government's latest household projection figures, which would see even greater development in areas of high demand and the construction of **575,000 new houses** between 2001-2026.

Other possible options were not considered on various grounds, for example:

- a 'zero growth' option, as it would not have delivered the overall objectives of the RSS, ie to promote urban and rural renaissance;
- a significantly higher concentration of housing in the MUAs, as it would not have been deliverable (given existing build rates and the cost of developing PDL sites) and would have had significant negative implications for housing market renewal processes; and
- a more dispersed option with more houses outside the MUAs, as it would not have delivered the urban renaissance objectives of the RSS.

In addition, the Spatial Options Paper also contained sections on the following topics:

- 'Employment' (which includes Future Employment Land Requirements, Protection of Employment Land, Regional Investment Sites, Major Investment Sites and Regional Logistics)
- 'Strategic Centres'
- 'Offices'
- 'Regional Casinos'
- 'Waste'
- 'Transport and Accessibility' (which includes Strategic Park and Ride; Car Parking Standards; Road User Charging; and, Role of the Region's Airports)

These sections did not present distinct options for addressing each topic, but instead presented background information on each topic and outline issues and questions for consideration by stakeholders.

The Sustainability Appraisal undertook an appraisal of the options put forward in the Spatial Options Paper and reported findings on the economic, social and environmental issues associated with options and the policy issues raised, in an *Options Appraisal Report*. The report also highlighted the sustainability issues and impacts which needed to be addressed in developing the Preferred Option. These included, for example, the need to focus development in MUAs to achieve urban renaissance and to address transport and accessibility issues, the need to make most efficient use of land resources to avoid development of greenfield sites and damage to biodiversity, the need to address energy and water use of the housing stock. Some of these recommendations also related to housing distribution (ie where and how many), while others related to policy on standards for development (ie how it should be done).

These recommendations were submitted to the Regional Assembly for consideration in developing the Preferred Option. The recommendations of the *Options Appraisal Report* were considered by the RSS Policy Leads, alongside the results of the public consultation and together with a wide range of other evidence, in developing the Preferred Option and policies.

1.7.2

Methods of Assessment

A Sustainability Appraisal Framework agreed at the *Scoping Stage* provided the structure for predicting and evaluating the effects of Phase 2 Preferred Option proposals. Proposals were assessed in terms of the extent to which they promote the achievement of the region's sustainable development objectives, as set out in the Regional Sustainable Development Framework:

- *Quantified proposals*: a number of the proposals were in a quantified form, while other policies set out standards or requirements which can be understood in a quantified way. It has been possible to assess many of these types of proposals and policies through quantified analysis, with the appraisal calculating the scale, location and/or significance of the resultant pressure or effect, providing a clear answer on whether the proposal promotes or hinders the achievement of objectives.
- *Qualitative proposals*: other proposals were more qualitative and less prescriptive about what is required, eg policies which promote, encourage, or establish criteria for consideration. It was generally not possible to quantify the effects of these types of proposals, and instead the appraisal tended to assess in a qualitative way whether the proposals would support or work against any particular Appraisal Framework objective.

The appraisal has included an assessment of timeframes showing whether the implications of the proposals are expected in the short, medium or long term. It also assesses issues such as the geographic scale and location of effects, time periods and the probability of effects, and whether those effects were direct/indirect (i.e. primary or secondary) and permanent/temporary (i.e. reversible or not). In addition, an assessment of the cumulative and synergistic effects of proposals has also been carried out.

In order to inform the assessment of effects, the appraisal drew wherever possible on available evidence. In all cases, the SA has come to conclusions about the likely nature and significance of effects using this available evidence base and applying professional judgement to answer the questions in the Appraisal Framework. Where there was uncertainty about the likely effects and published evidence on a particular issue could not be found, this is noted in the assessment as an area of uncertainty.

The Sustainability Appraisal has been carried out alongside the drafting process, with policies regularly reviewed and comments fed back to the RSS Policy Leads, to ensure that the sustainability implications of each new draft are understood, and ultimately to ensure that the final Preferred Option and policies promote the Region's sustainable development objectives.

1.7.3

Uncertainties

There were a number of limitations and uncertainties associated with the appraisal findings set out in the report. These were related to the following issues:

- *Complexity of the RSS*. The RSS is a very complex and wide-ranging strategy. While the SA has attempted to analyse the effects over the lifespan of the plan, and to assess the differential spatial impacts which

may result, it is not possible to identify all of the more spatially-specific and longer-term effects.

- *The role of other plans and processes.* Many of the proposals put forward by the RSS will interact with other plans and processes outside the control of the RSS. While the SA has identified these factors, and attempted to factor them in as part of the cumulative impacts assessment, there are considerable uncertainties involved.
- *Implementation.* Many of the effects of the Preferred Option and policies will be determined by local circumstances, in particular the precise location and method of implementation. In some cases, the appraisal is usually only able to discuss the broad probability of an effect occurring.
- *Data.* A common problem affecting SA is the availability and reliability of data. Although data has been collected to illustrate conditions and trends for all of the RSDF objectives, some data sets are more useful than others, and some data sets are known to be old, incomplete or unreliable. It is therefore almost impossible to quantify pressures and effects with total certainty.

1.8 **LIKELY SIGNIFICANT EFFECTS AND KEY IMPLICATIONS OF THE PREFERRED OPTION AND POLICIES**

Each revised policy was appraised in turn, so that the specific implications of individual aspects of the revision could be understood. In addition, overall conclusions were drawn about the implications of chapters or groups or chapters, and finally an overall assessment of the implications of the revised policies as a whole was undertaken.

Given that the revised policy proposals cover a very wide range of issues, a broad geographical scope and a 20 year time period, there are considerable uncertainties associated with drawing overall conclusions from the appraisal findings. However, the main significant impacts and the key implications that appear to arise from Phase 2 of the RSS Revision are summarised below.

Table 1.3 Summary of Likely Significant Effects and Implications

RSDF Objective	Assessment
<p>1. Use natural resources such as water and minerals efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment.</p>	-
<p>Water efficiency measures will not be enough to prevent headroom deficits in some locations, ie within the Herefordshire Conjunctive Use zone during 'Critical Use periods' between 2017-2022, within the South Staffordshire by 2025-2026, within the Severn zone between 2011-2016 and 2019-2024, and within the Birmingham zone between 2016-2023.</p> <p>The proposed level of housing construction would consume 22.8mt between 2006 and 2026. This does not include the aggregate that would be required for construction of other infrastructure, eg roads, schools, healthcare facilities etc. However, policies are in place to promote greater use of recycled aggregates, which will help to reducing the likely increased demand for primary resources.</p>	
<p>2. Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives</p>	+
<p>RSS policies strongly support the development of high value/low impact technologies, both by</p>	

RSDF Objective	Assessment
<p>requiring their use through design and construction standards and by providing employment sites to support key economic sectors. Waste policies will also indirectly promote the development of new resource efficient and environmental technologies.</p>	
<p>3. Promote and ensure high standards of sustainable resource efficient design, construction and maintenance of buildings, both new build and existing stock, where possible exceeding the requirements of the Building Regulations.</p>	+ +
<p>The RSS aims to promote sustainable design and construction principles in new developments, with an overall objective of ensuring that LDDs ensure that buildings are designed and constructed to their highest possible environmental standards, which covers many of the most important environmental sustainability issues which arise from design, construction and operation of buildings and developments.</p>	
<p>4. Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents, and improve health through increased physical activity.</p>	-
<p>5. Ensure development is primarily focused in the major urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car.</p>	
<p>The revised policies in Chapter 9 on 'Transport and Accessibility' have a strong emphasis on improving accessibility and mobility while at the same time promoting sustainable transport. Other policies elsewhere in the RSS also aim to support more sustainable transport patterns, through the design and location of housing and employment developments and the promotion of sustainable communities. However, it is not clear to what extent the encouragement of more sustainable transport patterns will offset the growth in demand from growth in both the economy and in housing. Detailed information on areas of congestion is not available, and no transport modelling has been done to understand the likely transport patterns which may arise from the housing distribution. However, a broad assessment can be made which indicates that congestion is likely to worsen in many parts of the region and some sections of the network in particular.</p>	
<p>6. Encourage and enable waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream, including the use of recycled materials where possible.</p>	+
<p>The policies on waste establish important principles and provisions to ensure that the region's waste is managed in a sustainable way. They promote the waste hierarchy and require sub-regional net self-sufficiency which will help to promote sustainable waste management practices. The policies encourage greater resource efficiency through restricting landfill and promoting increased recycling and recovery of resources. They also contribute to encouraging communities to take responsibility for their own waste and meet their own needs. Increased recycling in line with the waste hierarchy is likely to require more waste transport, however a number of measures will also help to minimise the need for waste transport. The overall balance of effects on waste transport and on greenhouse gas emissions and other air emissions is unknown.</p>	
<p>7. Encourage local sourcing of food, goods and materials</p>	+
<p>Most of the policies under the revision do not have any relevance to this issue. However, the Sustainable Construction policy promotes the use of locally-reclaimed materials for construction and this is supported by policies in the waste section which promote local recycling of construction and demolition waste.</p>	
<p>8. Reward efficient resource use and encourage development of alternative and renewable resources in order to reduce dependence on fossil fuels.</p>	+
<p>The Sustainable Construction policy (SR3) contains a number of provisions which will support (if not reward) efficient resource use, and encourage the development of alternative and renewable resources. Policies on waste also have the potential to affect levels of renewable energy generation, however the likely levels of renewable energy generation are unknown and dependent on residual treatment technologies.</p>	
<p>9. Encourage corporate social and environmental responsibility, with regional organisations and agencies leading by example.</p>	+
<p>This issue is considered to be not directly relevant to, or deliverable by, the RSS. However, the</p>	

RSDF Objective	Assessment
Sustainable Construction policy does contain a number of provisions which will help to support sustainable procurement practices within the region's housebuilding industry.	
10. Encourage and support a culture of enterprise and innovation, including social enterprise.	+
Employment policies within Chapter 7 Prosperity for All give direct support to the objectives of the Regional Economic Strategy by facilitating employment sites to support enterprise and innovation. The waste policies will also indirectly promote greater innovation by requiring increasing levels of waste recycling and recovery.	
11. Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Region's inhabitants.	?
<p>The RSS contains a range of measures to ensure that development takes place to support the regional economy. Many of these are in direct support of the objectives of the Regional Economic Strategy, for example by ensuring an appropriate supply and distribution of employment land of the right type in the right place. There is also a range of policies which seek to promote economic growth by ensuring that the required supporting measures are in place, for example improving the performance of the region's transport network and enabling appropriate development to support airport expansion.</p> <p>Research carried out for AWM suggests that while the overall levels of housing growth for the region as a whole are close to that required to support economic growth, the housing allocations at district level will not meet projected demand and support the economic growth projections from the draft RES.</p> <p>The employment policies emphasise the need to balance new housing and population change with employment growth. This should help to promote accessibility to jobs and reduce the distances which people need to travel to work. However, comparing the current draft employment land allocations with the housing growth figures, it appears that the amount of employment land does not bear a strong correlation to housing growth figures at district level, and so the policy aspiration is not clearly borne out by the figures.</p>	
12. Reduce overall energy use through increased energy efficiency.	∅
<p>The development of 365,600 additional dwellings on its own is certain to increase overall energy use, unless steps are taken to ensure that those dwellings are more energy efficient. The Sustainable Construction policy (SR3) introduces a range of measures to do this, although it is calculated that this policy will see the CO₂ emissions from the region's housing stock increase by 3.2% over the plan period 2006 to 2026.</p> <p>Revisions to transport policies will support greater energy efficiency in transport. The revisions directly aim to minimise the demand for road transport and encourage more sustainable forms of travel, which will help to increase transport energy efficiency.</p>	
13. Increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating, and in transportation.	+
<p>The policies within Chapter 2 on 'Towards a More Sustainable Region' contain provisions to increase the amount of energy generated from renewables. In particular by requiring Local Authorities to exploit opportunities to develop and use renewable energy, including larger scale renewable and decentralised energy generation, and for developments to incorporate renewable and low-carbon energy to meet at least 10% of demand.</p> <p>Policies on transport and waste are also relevant to renewable energy generation. Specifically, developments to support airport expansion are explicitly required to be carbon neutral which will promote the incorporation of renewable energy generation schemes. See also comments on waste management and renewable energy generation above for RSDF8.</p>	
14. Minimise the Region's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources.	-
<p>By ensuring that all 434,970 new houses (replacements for demolished housing and housing on new land) meet all the targets from the date of their introduction, by 2026 the region's housing stock would be emitting 3.2% more CO₂ than it was in 2006, compared to an increase in the size of the region's housing stock of 15.7%. The deployment of renewable energy would further reduce emissions from the housing stock – and all developments above 10 dwellings in size will be required to meet 10% of their energy requirements from renewable energy – as would retrofitting pre-2006 housing stock. However, 3% growth in CO₂ over 20 years is not going to be a sufficient rate of change to meet the Climate Change policy's requirement that a 60%</p>	

RSDF Objective	Assessment
<p>reduction be delivered by 2050.</p> <p>It is also assumed that the region's economy will grow as a result of the RSS, with a larger workforce, the provision of new employment land, more office space, more retail floorspace etc, all of which could result in higher emissions of greenhouse gases although these may be offset to some extent by replacing older, more energy-intensive industries. There is no information available on the likely effect that the RSS will have on CO₂ emissions from the growing economy.</p> <p>Emissions from the region's transport sector may also rise with an increased population, more economic activity etc. A number of policies directly aim to minimise the emission of greenhouse gases from transport, others are likely to increase emissions, and others will have an uncertain effect. No detailed information is available on the transport patterns that are likely to arise from the proposed housing and employment development, so no assessment of CO₂ emissions can be made.</p>	
<p>15. Implement a managed response to the unavoidable impacts of climate change, ensuring that the design and planning process takes into account predicted changes in the Region's climate.</p>	+
<p>A number of policies are in place to help the region adapt to climate change, in particular policies require that all new development promotes use of sustainable drainage techniques, incorporates 'climate-proofing' and enhances natural habitats for the benefit of biodiversity and local climate moderation.</p>	
<p>16. Land use and development that takes into account predicted changes in the Region's climate including flood risk.</p>	?
<p>There are some districts with medium/high flood risk issues where housing development will be focused. However, it is not certain that developing these houses will automatically result in higher flood risks. Depending on where and how these houses are developed flood risk issues may not necessarily worsen. Furthermore policies are included which specifically address flood risk.</p>	
<p>17. Value, protect, enhance and restore the Region's environmental assets, including the natural, built and historic environment and landscape.</p>	-
<p>The additional development promoted by the RSS is likely to increase pressures on the region's environmental assets – the natural environment, the historic environment, landscape and townscape etc – depending on where it is located and how it is developed. Impacts will be both direct (eg land take, increased disturbance through noise/recreation/traffic etc, damage to landscapes and townscapes, destruction of archaeology and historic sites) and more indirect (eg changes in air quality, water quality and quantity). There are also policies which will reduce or mitigate pressures arising from the proposed levels of development.</p> <p>Even if PDL/brownfield land is prioritised in line with policies, non-PDL land will be required to deliver the additional housing proposed. An estimated 2,842ha of other land would be required in addition to PDL identified in the Regional Housing Land Capacity Study 2007, which could be greenfield land or land reallocated from other uses. It should be noted that these calculations do not include land that would be required for other infrastructure (eg roads, secondary schools, hospitals etc). Furthermore, it has not been possible to assess the likely impacts arising from the cumulative effects on land take of housing allocations, employment land allocations and allocations for retail and office space, as there is no information available about current or future capacity for any of these other types of development at district or regional level. It seems very likely that the some of additional housing land requirement identified above will come from green belt.</p> <p>Given the level of development across the region, there are likely to be negative impacts on the current character and appearance of landscapes and townscapes. In particular, negative landscape impacts are inevitable where development takes place on green belt or in rural locations on the edge of expanding towns. In addition, there may be negative townscape impacts where significant amounts of development take place in and around historic towns. However, it is possible to develop in sensitive urban locations without damaging the town's character and even enhancing it, and policies are in place to promote this.</p>	
<p>18. Value, maintain, restore and re-create regional biodiversity, where possible using approaches that improve the resilience of natural systems such as linking fragmented habitats.</p>	-
<p>In broad terms, the construction of 365,600 additional houses in conjunction with the proposals</p>	

RSDF Objective	Assessment
<p>for employment land, retail and office space and waste-related development, is very likely to increase pressure on the region's environmental assets – including biodiversity and geodiversity – depending on where development is located and how it is implemented. Impacts will be both direct (eg land take, increased disturbance through noise/recreation/traffic etc, habitat 'nibbling') and more indirect (eg changes in air quality, water quality and quantity). Increases in levels of traffic associated with these developments will contribute to pressures on habitats and species. A Habitats Regulations Assessment has been undertaken alongside this SA, to assess the implications for the region's key biodiversity assets and this concluded that it cannot be concluded that significant adverse effects will be avoided and therefore has made a series of recommendations for amendments to the RSS policies and supporting text.</p>	
<p>19. Minimise air, water, soil, light and noise pollution levels and create good quality air, water and soils.</p>	<p>∅</p>
<p>There are a number of general factors which may affect air quality in the West Midlands, particularly levels of nitrogen oxides (NOx). Growth and development proposed in the RSS is likely to impact on all of these factors and patterns – in both positive and negative ways. These could include changes in transport patterns, in energy generation and in economic activities. Various policies will interact in different ways in different locations, and it is not possible to predict where air quality will deteriorate. However, it seems very likely that atmospheric pollutant emissions from transport will rise in areas where congestion increases, although increases in background concentrations of NOx (and potentially ground level ozone) across the region are likely to be relatively small.</p> <p>Wastewater treatment infrastructure is already under stress in some parts of the region and the urban areas have many STWs which would not be able to expand their capacity to accommodate growth in housing and business without there being a risk of breaching standards. Avoidance of adverse effects therefore relies on full implementation of policy QE9. There is also increasing risk associated with runoff from hard surfaces, particularly if this carries pollutants such as oils directly into drains and water courses. However, policy SR3 requires developments to be able to contain rainfall from 1:250 year flood events, and therefore significant effects are unlikely if the policy is fully implemented.</p> <p>Large amounts of previously developed land will be used to deliver the housing growth and it is very likely that the RSS will result in the decontamination and remediation of some existing contaminated land, supported by waste policies which promote soil remediation. However, significant amounts of other land will be required, possibly 2842 ha of other land. It is very likely that some of additional land requirement for housing identified above will be greenfield land. These figures do not take account of land that would be required for accompanying infrastructure or for land for employment land, office and retail space, and likely overall effects on soil quality is unknown.</p> <p>In broad terms, it is highly likely that the development of new housing in areas where housing has not previously been present will cause new light and noise pollution in those areas. Furthermore, additional housing in already built-up areas may increase noise pollution, eg from increased traffic levels. There are policies, however, which will help to mitigate these issues, in particular the Sustainable Construction policy.</p>	
<p>20. Encourage land use and development that optimises the use of previously developed land and buildings.</p>	<p>∅</p>
<p>Regionally, over the whole plan period, 73.2% of the gross number of dwellings will be constructed will be on PDL, and new policies are in place to make sure that the use of PDL is maximised. However, even though PDL usage would be maximised, there would a reduction on current PDL usage (83%), and there are large disparities at district level in terms of what proportion of new housing could be delivered on PDL.</p> <p>The Sustainable Communities policy (SR2) asks local planning authorities to maximise the reuse of buildings (sub-section C).</p>	
<p>21. Encourage land use and development that creates and sustains well-designed, high quality built environments that incorporate green space, encourages biodiversity, and promotes local distinctiveness and sense of place.</p>	<p>+</p>
<p>There are many provisions in both the Sustainable Communities and Sustainable Construction policies which look to promote high quality design. However, most importantly, all developments must now meet the Building for Life 'good' standard, with medium and large-scale developments meeting the 'very good' standard. This standard is best practice in development design, and if implemented will make a very significant contribution to driving up the quality of</p>	

RSDF Objective	Assessment
<p>residential developments in the region.</p> <p>The Sustainable Communities and Sustainable Construction policies both include provisions which promote the inclusion of green infrastructure within development, providing the full range of environmental services, and protects biodiversity, geodiversity, historic assets and landscape character.</p>	
<p>22. Encourage local stewardship of local environments, for example by promoting best practice in agricultural management or enabling communities to improve their neighbourhoods.</p>	○
<p>The revised policies in the RSS cannot deliver or impact directly on this objective.</p>	
<p>23. Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation.</p>	+
<p>The housing policies look to support housing renewal in areas where there are problems or market failure and a need for economic regeneration. By ensuring that the quality of housing stock and the overall quality of life in these communities is improved, the housing policies will help to improve environmental quality in these areas.</p>	
<p>24. Enable communities to influence the decisions that affect their neighbourhoods and quality of life.</p>	+
<p>The RSS will not have a major impact on the achievement of this objective. However, the Sustainable Construction policy requires that public involvement in design and during occupation is promoted as part of developments.</p>	
<p>25. Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location.</p>	+
<p>The RSS is likely to improve levels of access to services, facilities and opportunities. Housing development will be focused in towns and cities which already act as sub-regional service centres and have good public transport/walking/cycling infrastructure. Policies also seek to focus high density developments around transport interchanges, and in a variety of ways require development that improves accessibility to services and employment. In addition, office and retail development will be promoted in centres to ensure accessibility, and aiming for a better balance between housing growth and employment land will support better access to job opportunities.</p>	
<p>26. Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.</p>	+
<p>The RSS explicitly aims to ensure that disadvantaged groups and communities are able to access employment opportunities, helping in an important way to address poverty and disadvantage. Employment land policies seek to focus development within the MUAs and Regeneration Zones which contain most areas of disadvantage within the region. It also seeks to facilitate employment development in rural areas which can help to address areas of rural disadvantage.</p>	
<p>27. Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services.</p>	∅
<p>The revised policies will enhance the region's health by (a) improving the quality of the region's housing stock (b) by encouraging people to be active and (c) by providing healthcare facilities. However, it is not clear whether the quality of the environment will worsen as a result of development, in particular air quality. Overall it is not possible to assess whether the impact of all of the policies will be positive or negative on health.</p>	
<p>28. Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant local environments.</p>	-
<p>The Communities for the Future policies clearly aim to provide the right mix of housing in the right places, to support housing market renewal, to address problems of affordability, and to deliver mixed communities. However, the figures do not seem likely to meet local housing need where it arises. Some local authority areas will have an acute shortfall when compared to locally-generated housing needs and some an oversupply. Policy requires specific provision of</p>	

RSDF Objective	Assessment
affordable housing, although the levels are unlikely to meet demand. Increasing build rates overall may help to reduce the rate of house price increases, although the figures indicate that some local authorities will see a fall in build rates.	
29. Reduce crime, fear of crime and antisocial behaviour.	+
There are a some provisions in the RSS which look to reduce crime, fear of crime and antisocial behaviour in new developments. In particular, the Sustainable Communities policy asks local planning authorities to create attractive, well-designed, adaptable, safe and secure developments. More specifically, the Sustainable Construction policy requires that at least the good standards from the West Midlands Sustainability Checklist are applied on security of developments, which requires that there is evidence of a Secured by Design strategy.	
30. Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the West Midlands can offer locally and in the wider region.	+
Aspects of the revised policies aim to ensure that cultural, sporting and recreational opportunities are provided in new developments. In particular, there are provisions to ensure that local planning authorities provide the necessary services and infrastructure (eg health, education, spiritual, sport, recreational and cultural) to meet the needs of the population and to provide access to greenspace for walking, cycling, recreation etc.	
31. Encourage physical development with a better balance of jobs, housing, social and cultural services and amenities within each part of the Region in order to meet local needs locally and encourage stable and sustainable communities.	-
The policies on distribution and phasing of housing will not concentrate housing development in the MUAs, will not stem out-migration of households, and will not support urban renaissance. In this strategic sense, the housing policies will not lead to a balanced of development in each part of the region, with local needs being met locally, and is probably unlikely to lead to the development of stable and sustainable communities. In 2006, 53.4% of dwellings were located in the MUAs, but under the proposals, in 2026 only 52.4% of dwellings will be within the MUAs. Furthermore, housing is not provided in the right districts to meet new housing needs where it arises, and much of the housing proposed for the Settlements of Significant Development will be to meet demand arising in the MUAs. A phasing policy has been developed to accelerate housing development in the MUAs in the first part of the plan period, but 55.5% of additional housing constructed between 2006 and 2016 will be outside the MUAs. However, the policies on employment land and centres will broadly support the provision of jobs and services in balance with new housing developments.	
32. Ensure that the Region's workforce is equipped with the skills to access high quality employment opportunities suited to the changing needs of the Regional economy, whilst recognising the value and contribution of unpaid work.	+
Employment land policies have a clear emphasis on ensuring skills development to enable access to employment opportunities. Policy explicitly promotes the development of skills within the Region to improve access to employment opportunities. In addition, policies on the location of specific types of employment sites require sites to be accessible to education and training opportunities to ensure that the local workforce is able to take advantage of the employment benefits.	
33. Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development.	++
Policies within the Phase Two revision have a clear emphasis on promoting investment in future prosperity. The employment policies directly seek to promote economic growth which will promote investment in future prosperity, and to encourage new employment land provision which supports sustainable economic growth. The development of strategic centres will also help to promote economic growth and investment in future prosperity through the provision of new office and retail space, although this will be focused in the urban areas and other areas are unlikely to benefit. By promoting the waste hierarchy, the policy indirectly encourages the development of innovative approaches to managing waste, which will help to support the diversity, efficiency and competitiveness of the waste sector, thereby making a contribution to future prosperity. The transport policies aim to support future prosperity by delivering a transport system which improves accessibility and reliability while becoming more sustainable. More specifically, the	

RSDF Objective	Assessment
airports policy T11 aims to promote investment in future prosperity by facilitating development to support the expansion of regional aviation, although there is conflicting evidence about the likely economic impacts of this.	

1.9

MEASURES TO ADDRESS SIGNIFICANT ADVERSE EFFECTS

There are a range of issues where the revised policies can be improved or strengthened, to take advantage of additional opportunities, or to address mixed or negative impacts. A range of recommendations are made for measures which can be taken to address these issues. Seven general recommendations arising from the broad implications of the Preferred Option and policies are listed below, together with more policy-specific recommendations, and a set of further recommendations arising from the Habitats Regulations Assessment.

Table 1.4 General Recommendations from SA

Number	Recommendation
Recommendation 1	Policy CF4 should take 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.
Recommendation 2	Policy CF3 should establish housing figures for non-MUA districts as maxima.
Recommendation 3	Implementation Plan must ensure that infrastructure is delivered (eg transport, water, wastewater, flood risk etc) in Settlements of Significant Development.
Recommendation 4	Policy CF7 should require the provision of 5,140 social housing units and 3,000 intermediate housing units, broken down by Housing Market Area, in line with projections from the Cambridge Centre for Housing and Planning Research report.
Recommendation 5	Policy PA6A should more closely allocate employment land to reflect levels of housing growth and unemployment, particularly in Birmingham, Solihull, South Staffordshire, Staffordshire Moorlands, Bridgnorth, Bromsgrove, Malvern Hills and Wyre Forest.
Recommendation 6	Policy SR1 should establish a regionally-specific target on CO ₂ reductions (eg reduce emissions from the region's housing stock by 30% by 2026).
Recommendation 7	A policy in the Communities for the Future chapter should require that new housing development helps to fund the retro-fitting of existing housing stock with energy efficiency measures.
Recommendation 8	Policy CF6 should establish a region-wide minimum density rate to apply to all developments greater than 10 units or 1,000m ² (eg 40 dwellings per hectare), and an overall density target rate for the region as a whole (eg 45 dwellings per hectare)

Table 1.5 Policy-Specific Recommendations from SA

Number	Policy	Recommendation
Recommendation 9	SR2	Policy should ask local authorities to look to deliver housing in sufficiently large developments so that other community resources can be delivered alongside housing more effectively, eg through large scale regeneration projects, urban extensions or new settlements, as opposed to smaller infill developments.
Recommendation 10	SR2	Policy should ask local authorities to look to enhance and extend natural habitats and create <i>new assets</i> , to help protect biodiversity from the likely effects of climate change.

Number	Policy	Recommendation
Recommendation 11	CF7	Policy could 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).
Recommendation 12	PA6A	Add a criterion to policy that the location of sites should promote sustainable transport behaviour, including that sites are or will be served by public transport.
Recommendation 13	PA6A	Give priority in policy 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.
Recommendation 14	PA6A	Promote employment land in mixed use development
Recommendation 15	PA6B	Clarify in supporting text 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)
Recommendation 16	PA6B	Include the following as criteria in employment land reviews: <ul style="list-style-type: none"> • the degree to which the employment land supports mixed use and balanced development objectives; • whether the site provides employment land near or accessible to the potential workforce; • whether the site provides employment accessible to deprived communities and supports investment in areas of deprivation; vulnerability to changes in flood risk.
Recommendation 17	PA7 and PA8	Sites proposed in development plans for RISs and MISs should be required 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.
Recommendation 18	PA9	Include in policy a requirement policy 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.
Recommendation 19	PA13A	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.
Recommendation 20	PA13A	Policy should include consideration of potential loss of accessible green space in assessing locations for development.
Recommendation 21	PA13C	Development under policy PA13C should consider the potential impact on road congestion and pollution and could be required to promote the use of public transport to reach casinos
Recommendation 22	T6	The RSS should require park and ride schemes to be explicitly linked to a broader package of measures to manage demand such as those encouraged by policies T7 and T8. The supporting text should highlight the importance of schemes being able to demonstrate that they support the achievement of more sustainable communities and the

Number	Policy	Recommendation
		objectives of urban and rural renaissance.
Recommendation 23	T11	Policy should encourage exploration of the potential for use of rail freight from Coventry.
Recommendation 24	T12	Policy should give greater emphasis on investment in public transport schemes in the list of priority investments.
Recommendation 25	W1	Waste policy should include a requirement to minimise greenhouse gas emissions from waste management activities, including from transport.
Recommendation 26	W2	Increase diversion levels for C&I waste to meet national target for 2010.
Recommendation 27	W2	Strengthen emphasis in supporting text on importance of waste minimisation activities for both MSW and C&I waste.
Recommendation 28	W2	Waste policy should include a commitment to support local/regional processing of recyclate and markets for recycled materials.
Recommendation 29	W3	Emphasise in supporting text the importance of sites in proximity to areas of congestion or low air quality maximising the use of alternatives to road transport wherever possible.
Recommendation 30	W5	Policy should clarify the accessibility criteria to prioritise location close to the source of waste over end users.
Recommendation 31	W6	Provision of sites in rural areas should be considered in terms of overall sustainability impacts and benefits.
Recommendation 32	W11	Include a requirement to promote restoration benefits, for landscape, recreation and amenity and biodiversity.
Recommendation 33	W11	Include requirement for methane capture and energy generation from landfills unless it can be shown that methane will not be generated from the particular landfill site.

Table 1.6 Recommendations from HRA

Number	Recommendation
Recommendation 34	Introduce a new specific policy on air pollution to explain the need to focus on air quality as a regional issue.
Recommendation 35	Following the integration of a regional approach on air quality into local planning guidance the RSS should require local authorities to adopt a "pollution neutral" approach to NOx emissions.
Recommendation 36	Either: <ul style="list-style-type: none"> housing numbers in Cannock Chase and Stafford districts (re Cannock Chase SAC) and Staffordshire Moorlands and Stoke on Trent districts (re Peak District Moors SPA and Peak District Dales SAC) should be reduced; or Policy CF3 should be amended as follows: 'The delivery of additional housing in these districts is dependant on further studies to confirm that the housing and associated traffic movements will not lead to an increase in local air pollution at the site'.
Recommendation 37	New policy: 'Strategies, plans and programmes must consider the potential impact of new development and increased traffic levels on internationally designated nature conservation sites and adopt measures to minimise these impacts'
Recommendation 38	Policy CF4 should be amended to take account of constraints on the phasing of housing delivery to ensure that required water treatments infrastructure is in place.
Recommendation 39	New policy requiring Local Authorities to engage in early consultation with Water Companies and the Environment Agency on site allocations for significant developments to ensure sewerage infrastructure is considered early in the plan process.
Recommendation 40	New policy in the water section requiring Local Authorities to carry out water cycle studies where appropriate to inform the LDD. Alternatively this could be achieved by altering policy QE9 to include wording to this effect.
Recommendation 41	Ensure that the implementation plan links up the delivery of housing

Number	Recommendation
	with the capacity of the STW and sewage network and planned improvements to these so that quality of effluent discharged would not be compromised. This should be included in RIP phasing.
Recommendation 42	A locationally-specific recommendation to address the urgent need for new/improved wastewater treatment capacity to be implemented to avoid the adverse effects on the Severn Estuary Sites, River Wye SAC, River Mease SAC, & Pasturefields Saltmarsh SAC may be needed following the findings from the Habitats Directive Reviews
Recommendation 43	Policy CF3 should be amended to indicate that housing numbers will be dependent on demonstrating no adverse effect from runoff.
Recommendation 44	Policies SR3 and QE9 should be amended from 'encouraging consideration of their use' to 'using SUDS to reduce any adverse effects on the water environment and especially designated conservation sites'.
Recommendation 45	Text to be added: 'Local planning authorities and tourism bodies should work together (where appropriate) and in consultation with Natural England to identify whether increased tourist numbers and recreational pressure could adversely affect the integrity of Natura 2000 and Ramsar sites, and appropriate mitigation should be identified in LDDs including the potential for urban based attractions'
Recommendation 46	Sub-clause should be added to CF3: 'Due to existing pressures on the integrity of Cannock Chase SAC, development should provide mitigation to ensure additional housing does not increase recreational pressure and have an adverse effect on the integrity of the site. The local authority must ensure that appropriate mitigation is provided to ensure increases in visitor numbers can be accommodated before housing numbers are agreed. Cannock Chase District Council should work closely with Natural England to identify appropriate mitigation requirements'
Recommendation 47	Consider amending Policies WD4 and 5 so that they make specific reference to the potential risks to European Sites in criteria for location of Waste Management Facilities.
Recommendation 48	Inclusion of a commitment in the RIP to a regional strategy to be developed with the Environment Agency and Natural England to tackle the spread of invasive species throughout the region, including action to stop the spread of, and eliminate invasive species. Invasive species to consider include amongst others Japanese Knotweed Fallopija japonica, Giant Hogweed Heracleum mantegazzinum, Himalayan Balsam Impatiens glandulifera, pondweeds Elodea, New Zealand Pigmy-weed Crassula helmsii, Pirri-pirri Acaena sp., Mink Mustela vison, Grey Squirrel Sciurus carolinensis, and Signal Crayfish Pacifastacus leniusculus.
Recommendation 49	A specific requirement for Wye Valley Woodlands and Forest of Dean Bat Sites needs to be included in the sub regional text (Chapter 3): 'Establishment of a 10km buffer surrounding the sites within which HRA would be required for proposals likely to cause land use change and implications would have to be reviewed in terms of site integrity. Implications of agricultural land use change may need to be considered.'
Recommendation 50	A specific requirement for River Dee and Bala Lake SAC needs to be included in the sub regional text (Chapter 3): 'Allocations and development in the North West and West Midlands likely to result in increased road traffic near the site will need to fund road improvements to ensure otter movements are sustainable and levels of mortality do not go up.'
Recommendation 51	Policies QE4 and QE6 could be amended so that they make specific reference to the role of Areas for Concentrated Biodiversity Enhancement in expanding and linking isolated habitat units, particularly where this will play a part in consolidating European Sites or buffering them against the effects of disturbance and land use change. Developers should contribute to the establishment and management of these areas in any case where their proposals will cause significant land use change with implications for a European site.
Recommendation 52	New policy: 'Where Natura 2000 sites cross local authority boundaries,

Number	Recommendation
	or where development in one district could have impacts in another authority's area, when carrying out Appropriate Assessments of LDD options, authorities must work jointly to assess the implications of development on such designated sites.'
Recommendation 53	Ensure policies (including W4 and 5) influencing broad locations make specific reference to the need to avoid risks to European and other designated sites.

1.10 **MONITORING RECOMMENDATIONS**

The Sustainability Appraisal advises the WMRA on how to monitor the significant effects of the implementation of the RSS, so that predicted and unforeseen adverse effects can be identified at an early stage and appropriate remedial action can be taken.

A set of indicators is recommended to the WMRA for inclusion within the wider monitoring of RSS implementation. The SA identifies a set of 34 indicators which will enable the Assembly to understand the key sustainability effects of implementing Phase Two of the RSS. Each of these indicators is identified against the key RSDf objective under which the effects would arise. The indicators cover those areas where the SA has identified that significant adverse effects are likely, and also covers those areas where the Phase Two revision is not predicted to give rise to adverse effects. In other words, these are areas where effects are currently unforeseen, but to which the Assembly should respond if effects arise.

Further information is given on the types of indicators recommended, the specific detail which should be monitored, potential data sources and expected frequency of updates.

1.11 **THE DIFFERENCE THE PROCESS HAS MADE TO DATE**

The SA has been fully-integrated into the Phase 2 Revision process, and the findings and recommendations have been given full consideration by the Policy Leads. Since May 2007, the development of the Preferred Option and policies has been informed by the Sustainability Appraisal in two distinct ways:

- *Formally*, through formal appraisal reports submitted at different stages in the process. Formal written feedback on the Preferred Option from the SA was provided in July, on 16 August, on 30 August and on 17 September 2007.
- *Informally*, through meetings, consultation events and one-to-one discussions, where the SA consultants highlighted and discussed findings and recommendations with Policy Leads, public consultees and other stakeholders.

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 (included in *Annex E*). This sets out the recommendations from the *Final Draft Sustainability Appraisal* of 17 September 2007 and includes responses from

the Policy Leads as to how they were going to take the recommendations forward. It 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.

The recommendations that were adopted in the final Preferred Option and policies are set out below.

Table 1.7 Adopted SA Recommendations

Recommended change	Comment	Response
SR1, 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. ³ 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
SR2, Sustainable Communities		
The policy should ask local authorities to:		
<ul style="list-style-type: none"> focus developments in areas where public transport is available or can be delivered 	Agree	Policy SR2 F now refers to provision of public transport infrastructure
<ul style="list-style-type: none"> provide affordable housing to meet relevant targets 	Agree	Policy SR2 A revised to include the provision of affordable housing
It is noted that policy SR2 does not contain any targets or standards, and as such is open to wide interpretation by local authorities. It is strongly recommended that CABA/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 CABA Building for Life standards
SR3, Sustainable Design and Construction		
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 ² , 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
Employment Land		
Include the following as criteria in employment land reviews in policy PA6B: <ul style="list-style-type: none"> the degree to which the employment land supports mixed use and balanced development objectives; whether the site provides employment land near or accessible to the potential workforce; whether the site provides employment accessible to deprived communities and supports investment in areas of deprivation; vulnerability to changes in flood risk. 		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. Other recommendations not yet addressed.
Give clearer priority in policies PA7 and PA8 to promoting public transport access to	Accepted.	Reflected in PA7 B(iv) and PA8 B (iv).

³ 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)

Recommended change	Comment	Response
sites, particularly in areas suffering from congestion and from poor air quality.		
Centres		
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.
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 improvement of public transport to avoid significant effects.	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. 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
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.
Transport		
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. No action in response to recommendations on compensation for loss of value
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
Supporting text to policy T7 should clarify how economic and social need might affect parking provision, noting that reducing congestion and increasing public transport use can help to enhance economic vitality.		Reference to addressing social need through car parking standards has been removed. No clarification yet of the role of parking standards in enhancing economic vitality.
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.

Recommended change	Comment	Response
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.
Policy T11 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.

1.12

HOW TO COMMENT ON THE REPORT

Consultation on this report, and on the Phase 2 Revisions to the West Midlands RSS, will run from Monday 7 January 2008 for twelve weeks until 28 March 2008.

For further information on how to comment on this report, please go to the website of the West Midlands Regional Assembly – www.wmra.gov.uk.