

West Midlands Regional Assembly

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

FINAL REPORT

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NON-TECHNICAL SUMMARY

INTRODUCTION

This is a Non-Technical Summary of the *Options Appraisal Report*, produced as part of the Sustainability Appraisal of Phase Three of the West Midlands Regional Spatial Strategy. It summarises the findings of appraisal work carried out to assess the effects and implications of draft policy options set out in the *West Midlands Regional Spatial Strategy Phase Three – Options – July 2009 – August 2009* document¹ (known as the ‘Phase Three Options Paper’) submitted to the Assembly Board of Directors on 25 March 2009.

WHAT IS SUSTAINABILITY APPRAISAL?

Sustainability Appraisal (SA) is a structured process for predicting and assessing the significance of the economic, social and environmental effects that would arise from a plan, programme or strategy. SA is mandatory for Regional Spatial Strategies under Section 39(2) of the *Planning and Compulsory Purchasing Act 2004*, and so must be carried out as part of the Phase Three Revision of the West Midlands RSS.

SA must also meet the requirements of EU *Directive 2001/42/EC*, known as the Strategic Environmental Assessment (or SEA) Directive, as transposed into English law by the *Environmental Assessment of Plans and Programmes Regulations 2004*. SEA is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes, and is required for Regional Spatial Strategies.

SA is an iterative process (ie involves the repetition of a number of steps) so that the implications of plan proposals are understood as the plan is being developed. As part of this process, an appraisal has been carried out on the Options Paper to understand the effects that are likely to arise from the proposals set out in that paper.

WHAT DOES THE OPTIONS PAPER SET OUT?

According to the Phase Three Options Paper, choices or directions that can be taken for the Region have been set out on:

- critical rural services;
- provision for gypsies and travellers;
- culture, sport and tourism provision;
- quality of the environment; and
- minerals.

It should be noted that clear options (ie alternative scenarios that can be assessed and compared) have not been developed for all of the topic areas. In some areas it was concluded

¹ <http://www.wmra.gov.uk/documents/Agenda%20Item%2011%20-%20RSS%20Phase%203%20-%20Draft%20Options%20Consultation%20Document.pdf>

by the Policy Leads team that it was better to set out 'issues' and questions to which consultees could respond.

KEY IMPLICATIONS ARISING FROM OPTIONS PAPER

Each section of the Options Paper was subject to an appraisal, so that the specific implications of individual aspects of the paper could be understood. The appraisal was carried out using a Sustainability Appraisal Framework, which sets out the questions for 'interrogating' and appraising the options that have been developed as part of the Phase Three Revision process. The SA Framework was developed in consultation with a range of stakeholders in the 'scoping stage' of the SA process.

Critical Rural Services

The policy options are likely to result in quite different patterns of service provision across the region's rural areas, and therefore have quite different environmental, social and economic impacts. However it is very difficult to be precise about what those impacts might be or where they might occur, as the options are defined in fairly general terms. Impacts will only be known when further detail is available on how each policy might be implemented. However, some general conclusions on issues where broad impacts can be identified are set out below.

- *Access to services.* While each option will result in different patterns of service provision (as well as different provision of health services, education services and other resources) and favour different rural communities, it is not possible to state that any of them are likely to be more easy or 'equitable'. Each of them will make access to services easier for some people, and more difficult for others. Option 1 will particularly favour residents in market towns, as well as probably improving access to higher order services for the rural community as a whole. Option 2 will particularly favour residents of smaller rural settlements, who may see access to lower order services improve significantly. Option 3 could result in different patterns of service provision in different parts of the region.
- *Travel and transport.* Option 2 is likely to lead to a more dispersed pattern of service provision, potentially accompanied by increased housing and employment land outside the county/market towns. While this may minimise or reduce the need to travel for some services (eg lower order services provided by local shops, primary schools, GPs etc), in the longer term a larger, more dispersed rural population is likely to travel more than if that growth was more concentrated. Option 1 may have the opposite effect, with dispersed communities needing to travel further to access everyday services, but with an increasing number of people accessing more services in county/market towns where there is also likely to be better public transport accessibility. It is not clear what transport patterns might arise from Option 3, as patterns of service provision may vary across the region.
- *Climate change mitigation.* While the policy is unlikely to have any impact on CO₂ emissions from households, commercial sources etc, emissions are likely to change as a result of transport patterns. Focusing service development (and housing and economic development) in county and market towns through Option 1 may in the long term result in lower CO₂ emissions (particularly from transport) than a more dispersed pattern of development under Option 2, although remaining residents in more remote communities may need to travel further than they do now. Option 2 is likely to have the opposite effect on transport-related emissions.

- *Environmental and historic assets.* It is not clear what impact the options might have on environmental assets, biodiversity, historic assets. The more concentrated development pattern under Option 1 may cause more significant localised impacts, but may also ensure that wider damage to these assets is not caused. Option 2 may have the opposite effects. Precise impacts will be determined by the nature, scale and location of the changes that arise in implementing the options, and at this stage it is not possible to know what those changes might be.
- *Use of PDL.* Option 1 may promote the use of brownfield and PDL, which is more likely to be found in county and market towns.
- *Local sourcing.* Supporting the development of rural services should help to encourage local sourcing of food, goods and materials. Option 2 may have the most significant impact, as it may most effectively promote the survival and development of the local shops and markets that are often best placed to supply local products.

Gypsies, Travellers and Travelling Showpeople

It is difficult to identify clearly different effects arising from each of the the three options on Gypsy and Traveller pitches and from the two options on plots for Travelling Showpeople. The options do not differ in terms of the total number of pitches/plots to be allocated across the region, and do not differ greatly in terms of local/sub-regional allocations. The options are also not spatially-specific beyond local or sub-regional allocations. Therefore it is difficult to distinguish differential effects arising from the options. However, some general conclusions have been drawn.

On pitches for Gypsies and Travellers

- *Travel and transport.* Option 2 may be less likely to support the development of sustainable transport patterns than the other options.
- *Flood risk.* Option 2 has been determined partly in light of information on Flood Risk Zones 2 & 3. This is likely to make it a better option than Options 1 or 3, although it is not clear that this would ensure that development would not increase risks from flooding.
- *Environmental assets.* Option 2 has been determined partly in light of a review of environmental constraints, understood to include Greenbelt, Areas of Outstanding Beauty, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SAC), Special Protection Areas (SPA), RAMSAR sites, National Nature Reserves, Ancient Woodland, and the Peak District National Park. This is likely to make it a better option than Options 1 or 3, although it is not clear that this would ensure that development would not have impacts on local environmental assets.
- *Biodiversity.* For the same reasons as outlined in the previous bullet, Option 2 is likely to be a better option than Options 1 or 3, although it is not clear that this would ensure that development would not have impacts on local biodiversity assets. In terms of Natura 2000 sites, the HRA Screening Report has concluded that significant effects are unlikely to arise for those sites, but that sensitive locations should be avoided in the preferred policy option.
- *Poverty, health, housing, access to services, sustainable communities.* The provision of 939 extra pitches will be vital to ensuring that the Gypsy and Traveller community has access to decent housing, services and opportunities, and that issues around poverty and deprivation, health inequalities and poor health are addressed. As such, all of the options are likely to support the development of stable and sustainable communities.

On plots for Travelling Showpeople

- *Climate change mitigation, transport.* Different options could have different impacts in terms of emissions from associated transport patterns. Option 1 focuses more of the additional plots in the West Midlands conurbation, which may suggest that this could help to promote more sustainable transport patterns. However, these impacts are likely to be very small, and it is impossible to draw any conclusions in terms of what transport patterns might arise while the options are not spatially-specific.
- *Flood risk.* Option 1 may focus more of the additional plots in local authorities with 'high relative inherent flood risk' – Birmingham, Sandwell, Tamworth, and East Staffordshire – as defined by the West Midlands Regional Flood Risk Appraisal (October 2007). However, neither of the options are sufficiently spatially specific for it to be possible to relate the proposals to flood risks.
- *Poverty, health, housing, access to services, sustainable communities.* Both options will provide an extra 112 plots, which will be vital to ensuring that the Travelling Showpeople community has access to decent housing, services and opportunities, and that issues around poverty and deprivation, health inequalities and poor health are addressed. As such, both of the options are likely to support the development of stable and sustainable communities.

Culture, Sport and Tourism

Options for Updating Part A of PA10A

The objective of PA10 Part A is to ensure that Development Plans 'encourage the improvement of existing provision as well as the creation of new facilities' and 'support the further development and success of key Regional tourism and cultural assets'. In addition, the Options Paper suggests that the policy could be amended so that sites are 'protected' from development. It is not clear whether the policy will look to improve/develop or protect cultural assets, and so it is difficult to know what outcome might arise from the inclusion of a portfolio of assets. In addition, the Options Paper does not present the portfolio of assets, and therefore it is not possible to assess the site-specific impacts that could arise from the promotion or protection of assets. For the purposes of this options appraisal, it has been assumed (in line with the supporting text from the Options Report) that including a portfolio of assets might 'encourage improvement of the identified assets', 'support the growth and diversification of the economy' and 'provide a guide for future investment by a wide range of partners', although it is recognised that if the policy was to focus on protecting the portfolio of assets then some of these outcomes may not arise. As such, some general conclusions can be drawn:

- *Access to cultural, sporting and recreational opportunities.* Both options aim to, and should, support the development of the region's cultural assets. However, it is assumed that Option 2, by including a portfolio of assets, would more effectively 'encourage improvement of the identified assets'. As such, it seems likely to have a greater positive impact on the provision of, and access to, opportunities to participate in culture, sport and recreation.
- *Transport and climate change.* It is not possible to know what impacts will arise as a result of improving the region's cultural assets, of making the region more attractive to visitors and residents, and of creating a 'world class' visitor destination. However, on balance it is thought that the policy is likely to lead to an overall increase in travelling, unless the policy specifically focuses on (a) regionally-important cultural assets and (b) promoting sustainable access to the region's assets. If Option 2 proves to be more successful at promoting the

improvement/development of the region's main cultural assets, it would probably result in greater transport impacts than Option 1. A knock-on effect of the extra travel that is expected to result from the policy that the greenhouse gas emissions associated with the region's cultural and tourism sector will also rise.

- *Health.* Access to sporting and recreational opportunities should have positive impacts on health.
- *Economic impacts.* It is also assumed that Option 2 will more effectively 'support the growth and diversification of the economy' and 'provide a guide for future investment by a wide range of partners', supporting the development of the region's cultural sector.
- *Impacts on water resources, flood risk, environmental assets, pollution, and biodiversity.* Assuming that either option would be successful at promoting the improvement/development of the region's main cultural assets, there may be some additional pressures on environmental assets and resources, increased flood risk, increased pollution etc. If Option 2 is to be more successful than Option 1 at promoting the development of the sector, it is likely that those pressures will also be greater under Option 2.

Quality of the Environment

The Quality of the Environment policies collectively will help to protect and enhance the region's environmental assets in both urban and rural areas, promoting the creation of green infrastructure and development of brownfield land for green space or biodiversity value and protecting the historic environment. The policies will have a positive impact on the protection and enhancement of landscapes and townscapes, and on the appearance and local distinctiveness of areas. Policies are likely to promote improved access to open space, thereby helping to promote recreation and health benefits and to alleviate flood risk.

The policies directly aim to increase the sustainability of water use, addressing both supply and demand side issues. Promoting water efficiency will help to reduce emissions of greenhouse gases from water treatment and supply and wastewater treatment, however investment in major new infrastructure will similarly increase emissions. The policies directly seek to reduce flood risk and increase resilience to flooding.

The environment policies will have direct and indirect benefits for biodiversity by preserving and enhancing natural areas and open spaces, and by seeking to improve resilience, decrease fragmentation and promote climate change adaptation. There are also likely to be indirect benefits from the maintenance and enhancement of environmental assets for maintaining or improving air, water and soil quality, and could make a contribution to adaptation to climate change, such as reducing flood risk, mitigating temperature rise and supporting biodiversity migration. Opportunities for climate change adaptation are recognised and promoted in various policies, for example capturing benefits for flood risk management, although these could be strengthened in some areas. More specific focus on areas of poor air quality could be provided, and further measures on air quality may be required in order to protect biodiversity and ecosystems.

The policies do not directly address resource efficiency, but one of the key principles should be to minimise the need to consume resources. Targets for energy efficiency could specifically be considered for inclusion.

The environment policies clearly recognise the multiple benefits of environmental improvement. However, there is no explicit promotion of an integrated approach to the protection and enhancement of environmental assets to capture these multi-functional benefits. There should be clearer guidance on what an integrated approach means in practice, and how assets can be valued for their intrinsic value as well as economic and social benefits.

The approach to managing and restoring assets can help to support regeneration of areas and may help to support urban renaissance. There is a recognition of the link between deprivation and poor environmental quality by prioritising green space provision and restoration in deprived areas and areas suffering damage and degradation. Particular focus is placed on areas under pressure including from growth and development arising from Phase Two, although not in respect of flood risk or green belt. While ensuring sufficient focus is important in the growth areas, it is equally important within existing communities and this should be more clearly promoted.

As well as promoting delivery at a regional or landscape scale, enhancements should be sought in individual developments. This should be required and strongly promoted in the detail of policy. Small areas of green infrastructure can make an important contribution and should be required to be provided within new developments.

The links between the historic environment and economic regeneration and vitality should be more clearly explained and promoted, for example in encouraging the environmental economy by supporting the demand for heritage skills.

The environment policies will encourage the development and use of environmental technologies, and support the environmental economy through the need for skills in various sectors. Policies also support the development and use of renewable energy technologies, helping to reduce greenhouse gas emissions and the dependence on fossil fuels.

Encouragement is given to sourcing of local foods and other products, including the production of energy crops and timber, thereby also contributing to renewable energy production and climate change mitigation and the development of new environmental technologies and support for the energy sector.

Options on QE2: Brownfield Land

The three options for the approach to brownfield land management could each give rise to different positive impacts in certain circumstances. The benefits of a revised policy QE2 could be maximised if the options are not considered as alternatives but are each included as a multi-stranded approach to brownfield land reuse.

Options on QE7: Biodiversity

Option 1 promotes the delivery of regional biodiversity targets, while option 2 focuses on developing new or enhancing existing assets. Sustainability objectives do not help to differentiate between the options, but any benefits accruing could be maximised with a combined approach, promoting both the delivery of targets on regional priority habitats and the use of mapping to identify areas for enhancement or opportunities.

Options on QE9: Water

Each of the options seeks to protect assets and improve areas where environmental quality is poor, although each targets those areas differently. By targeting growth areas only, option 2 may result in a low priority being given to some key areas of poor quality, particularly within the MUAs. Options 1 and 3 would capture those areas, although they would give less emphasis to the need to protect and improve assets in growth areas likely to be under pressure in future. Option 1 would additionally capture some areas of poor environmental quality outside the MUAs and growth areas, for example areas of poor air and water quality. The benefits will be maximised if the options are not considered as alternative approaches but as different elements of regional priorities.

Options on EN1: Renewable Energy

All options for renewable energy targets will encourage the development of alternative sources of energy, and increase the proportion of renewable energy generated thereby reducing achieving greater the region's contribution to climate change by reducing the emission of fossil CO₂ from energy generation. Option 1 is likely to achieve a substantially greater increase in renewable energy generation than option 2. Using data from the Regional Energy Strategy 2004, it is estimated that option 2 is unlikely to achieve the equivalent of the national targets in either 2010 or 2020 (option 2 might achieve the equivalent of 60% of the national target for generation in 2010 and less than 50% of the target in 2020). Setting targets for sub-regions as in option 3 may make it more likely that an overall regional target is met, similarly if targets are set for specific technologies.

All options for targets will give an added impetus to the renewable energy sector within and beyond the region and encourage greater take-up of new generation technologies. While option 1 may give a greater impetus overall, option 2 also gives support to sub-sectors concerned with transport fuel and heat which option 1 does not.

It is not possible to differentiate between the sustainability effects of the options on locational criteria, as it is not known whether the application of local criteria might result in more or fewer developments being approved, or whether environmental standards would be tighter or looser than if criteria were set at regional level. It is therefore not possible to comment from a sustainability perspective on the relative merits of the two options proposed.

Options on Green Belt

Both options would continue to protect an important environmental asset from inappropriate development, maintaining the quality of the landscape near the urban fringe, an important function of green belt. This is also likely to have benefits for protecting species and habitats, maintaining access to the open countryside, promoting recreation and physical activity and supporting and maintaining the rural economy, all of which are also important functions of the green belt identified by national planning policy. Option 2 could increase the opportunities for these benefits by promoting improvements in green infrastructure and landscape. It could also capture additional benefits through promoting improvement of the historic environment.

Although neither option would clearly and directly promote unbalanced development, both may fail to allow opportunities for development in otherwise sustainable locations within the green belt, for example to provide balanced development which promotes more sustainable communities and which minimises transport distances and the energy consumption and

emissions associated with travel, or to allow urban extensions which could provide critical mass for new infrastructure thereby potentially improving access to services and facilities.

Minerals

The minerals policies will help to promote local or regional sourcing of materials, helping to avoid longer transport distances and greater transport costs, and reducing greenhouse gas emissions from minerals transport. Bulk transport and alternatives to road are also likely to be promoted. The policies will also support jobs and businesses in minerals extraction, processing and transport, some of which will be important to the rural economy in areas where the industry is located, and will also help to ensure the provision of materials for new homes, premises and infrastructure to support population growth and the regional economy.

Providing more flexibility to safeguarding in urban areas could allow more balanced development, minimising travel and accommodating more housing in areas where public transport provision is relatively good.

Minerals policies encourage the use of secondary aggregates and alternative materials, reducing the need for primary extraction and helping to preserve the region's geological resources. This will promote more sustainable management of waste materials, increase the sustainability and resource efficiency of construction, and may indirectly help to give added impetus to the development of new technologies to provide new sources of materials and help to reduce the pressure on environmental assets and land. It is also likely to reduce material transport distances through local sourcing of materials. However, safeguarding infrastructure relating to secondary and recycled aggregates should be clearly promoted by policy.

Placing more emphasis on existing technologies to release energy sources from coal seams would promote greater use of fossil fuels and increase greenhouse gas emissions, reducing the proportion of energy generated by renewable and low-carbon sources.

Options on Safeguarding

No particular sustainability issues have been identified which would help to differentiate between the two proposed options on safeguarding.

Options on Aggregates Provision

It is not possible to make any useful or meaningful assessment of the options on sustainability grounds, without more detailed information about capacities, locations and environmental constraints. However, option 3 linking local supplies to future patterns of growth and infrastructure requirements and environmental capacity appears to give the greatest potential for minimising distances to markets and so reducing the impact of aggregates transport, while also minimising the potential damage to environmental assets which may result from extraction. Option 3 would also allow for greater consideration of other environmental constraints, for example flood risk, impacts on biodiversity and geodiversity, impacts on environmental assets such as open spaces, landscape and historic assets, and environmental quality issues such as air and water quality.

Options on Brick Clay Provision

It is not possible to differentiate between the identified options using sustainability objectives, as these only suggest alternative ways of applying the 25 year production requirement. It is not possible to assess the potential sustainability effects without more detailed information about capacities, requirements and locations. However, making the targets for supply as detailed and specific as possible may help to make it more likely that the requirements will be fulfilled. In this case, options 2 and 3 would provide the greatest likelihood that the industry is able to support the demand for new homes and to ensure the provision of other buildings to support regional economic activity.

1 **SUSTAINABILITY APPRAISAL OF DRAFT REGIONAL SPATIAL STRATEGY (RSS) PHASE THREE REVISION FOR THE WEST MIDLANDS – OPTIONS APPRAISAL**

This is the *Options Appraisal Final Report* produced as part of the Sustainability Appraisal for Phase Three of the Revision of the West Midlands Regional Spatial Strategy. The report sets out the findings of appraisal work carried out to assess the effects and implications of draft policy options set out in the *West Midlands Regional Spatial Strategy Phase Three – Options – July 2009 – August 2009* document² (known as the ‘Phase Three Options Paper’) submitted to the Assembly Board of Directors on 25 March 2009. It has been produced by URSUS Consulting Ltd, who have been commissioned by the West Midlands Regional Assembly to carry out the Sustainability Appraisal.

The report is structured as follows:

- *Section 2* explains the scope and objectives of the Regional Spatial Strategy, and explains what is covered by Phase Three of the revision process;
- *Section 2* explains what the SA aims to achieve, what work must be carried out to comply with statutory requirements, and how those requirements have been met;
- *Section 4* explains the process of developing the *Scoping Report* in 2008, and presents the Sustainability Appraisal Framework which is being used to appraise proposals put forward as part of the Phase Three Revision;
- *Section 5* sets out a review of the extent to which the Strategic Objectives of the RSS and the Phase Three Revision Objectives are compatible with the 33 objectives from the Regional Sustainable Development Framework;
- *Section 6* explains how the Phase Three policy options have been developed, discusses how the SA of options has been carried out, and sets out summary findings from the SA for each of the five policy topic areas in turn;
- *Section 7* explains which elements of the SA process have now been completed, and how the remaining elements of the process will be carried out.

In addition, *Annex A* sets out detailed appraisal findings on each policy option.

² <http://www.wmra.gov.uk/documents/Agenda%20Item%2011%20-%20RSS%20Phase%203%20-%20Draft%20Options%20Consultation%20Document.pdf>

This chapter explains the scope and objectives of the Regional Spatial Strategy, and explains what is covered by Phase Three of the revision process.

2.1 THE REGIONAL SPATIAL STRATEGY (RSS)

2.1.1 RSS Purpose

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.

In preparing their development plans and local transport plans, local authorities must take the RSS into account. The RSS may also be material to decisions on individual planning applications and appeals.

As a Spatial Strategy, the RSS will inform the development of strategies and programmes of other public agencies and service providers including those involved in health, education, skills and learning, and crime reduction. It will provide the longer-term planning and land use framework for the Regional Economic Strategy (RES).

One of the key features of the RSS is the role that it plays in addressing the links that exist between economic, social and environmental issues and the importance of adopting an integrated policy approach in response. It is particularly at the Regional level where the spatial inter-relationship between many of these issues becomes apparent along with their implications for the principles of sustainable development.

2.1.2 RSS Vision

The RSS sets out a vision for the region:

‘The overall vision for the West Midlands is one of an economically successful, outward looking and adaptable Region, which is rich in culture and environment, where all people, working together, are able to meet their aspirations and needs without prejudicing the quality of life of future generations.’

2.1.3 RSS Challenges

Four main themes and challenges have been identified in the RSS:

- *Urban Renaissance*: developing the Major Urban Areas in such a way that they can increasingly meet their own economic and social needs in order to counter the unsuitable outward movement of people and jobs facilitated by previous strategies.
- *Rural Renaissance*: addressing more effectively the major changes which are challenging the traditional roles of rural areas and the countryside.

- *Diversifying and modernising the Region's economy*: ensuring that opportunities for growth are linked to meeting needs and that they help reduce social exclusion.
- *Modernising the transport infrastructure of the West Midlands*: supporting the sustainable development of the Region.

2.1.4 RSS Objectives

The strategic objectives of the RSS are as follows:

- a) to make the Major Urban Areas of the West Midlands increasingly attractive places where people want to live, work and invest;
- b) to secure the regeneration of the rural areas of the region;
- c) to create a joined up multi-centred Regional structure where all areas/centres have distinct roles to play;
- d) to retain the Green Belt, but allow an adjustment of boundaries where this is necessary to support urban regeneration;
- e) to support the cities and towns of the Region to meet their local and sub-regional development needs;
- f) to support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion;
- g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region;
- h) to improve significantly the Region's transport systems;
- i) to promote the development of a network of strategic centres across the Region; and
- j) to promote Birmingham as a world city.

2.2 THE REVISION PROCESS

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). Given the range of matters to be considered, it has been agreed that these issues should be looked at in three phases, as follows:

- *Phase One, 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 Two*, including housing needs, urban capacity, employment land, airports, road user charging and waste management, was submitted to the Secretary of State in December 2007.
- *Phase Three*, including rural issues and significant environmental issues, to be submitted to the Secretary of State in February 2010.

It should be noted that the RSS vision, challenges and objectives are not being included in the RSS revision process.

2.3 PHASE THREE REVISION OBJECTIVES AND TASKS

There are five streams of work under Phase Three, with objectives and tasks for each. These are set out below.

Table 2.1 Phase Three Objectives and Tasks

Theme	Objective	Tasks
Critical Rural Services	<ul style="list-style-type: none"> • The WMRSS Revision aims to identify the role of service provision in enhancing the sustainability of rural communities, whether particular services are critical to this process and whether the process itself, and consequently the policies required to address it, varies in different types of rural areas. This will be important towards addressing the regional rural renaissance objective. • The WMRSS Revision will also aim to identify and prioritise those services that are critical to the sustainability of rural communities in different types of rural areas, especially to meet the needs of disadvantaged groups and communities. 	<ul style="list-style-type: none"> • To establish a working definition of a 'sustainable rural community' that is applicable, or modified, for different types of rural areas, with particular reference to the importance of fair access to services for disadvantaged groups and communities. • To identify and prioritise services which are critical to maintaining sustainable rural communities in different types of rural areas with particular reference to the interdependence between urban and rural areas. For example, rural areas with sparser populations may experience different issues and may have different critical needs from rural areas that are strongly influenced by Major Urban Areas and other large urban centres. • To identify the policies required to support the protection, enhancement and provision of critical rural services particularly to support 'fair access' to a choice of services to enable disadvantaged groups and communities to meet their service needs.

Theme	Objective	Tasks
Sites for Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> • To increase significantly the number of Gypsy and Traveller sites across the West Midlands, to address existing underprovision as indicated in the Regional Interim Statement and anticipated in the sub-regional housing market area 1 Gypsy and Traveller Accommodation Assessments (GTAAAs). • To ensure there are sufficient plots in the Region to meet the accommodation needs of Travelling Showpeople. • To ensure that all revised Gypsy and Traveller and Travelling Showpeople policies in the RSS, Local Development Frameworks (LDFs) and other regional and sub-regional strategies recognise, protect and ensure a traditional travelling way of life for Gypsies and Travellers and Travelling Showpeople, whilst also respecting the interests of settled communities. • To ensure that all Development Plan Documents (DPDs) include fair, realistic and inclusive policies in relation to the accommodation needs of Gypsies and Travellers and Travelling Showpeople and that the potential for Gypsies and Travellers and Travelling Showpeople to be evicted and thereby become homeless is avoided 	<ul style="list-style-type: none"> • To identify the number of pitches required for Gypsies and Travellers (but not their location) for each Local Planning Authority in the light of the GTAAAs, the Regional Interim Statement and a strategic view of needs across the Region. • To identify the number of plots required for Travelling Showpeople (but not their location) for each Local Planning Authority in the light of GTAAAs, the Supplement to the Regional Interim Statement and a strategic view of needs across the Region. • To investigate the potential of identifying pitch numbers by sub-regional housing market areas or other joint local authority areas in case joint Development Plan Documents are proposed to be produced. • To seek engagement with a wide range of stakeholders, including the Gypsy and Traveller and Travelling Showpeople communities, to ensure that all new policies are formulated with the intention of sensitively meeting the accommodation needs of both travelling and settled communities. • To ensure that, where appropriate, wider issues are considered in revising relevant policy, for example, health, homelessness, Environmental factors, employment opportunities or transport links.
Culture, Sport and Tourism	<p>The Phase Three Revision aims to strengthen WMRSS policy to meet cultural, sporting and tourism needs and through this support Urban and Rural Renaissance. Revised WMRSS policy will seek to improve the provision of, and access to, quality cultural and sports assets and provide opportunities to increase the rate of participation/attendance in cultural activities. Ultimately, revised WMRSS policy will seek to contribute to:</p> <ul style="list-style-type: none"> • Improve physical and mental well-being by encouraging healthier, more active lifestyles and greater and more inclusive access to, and participation in, cultural activities building on the legacy of London 2012. • Make the Region more attractive to businesses, residents, visitors and in-movers as a result of the cultural offer. • Support the growth and diversification of the regional economy to create a 'world class' visitor destination. 	<ul style="list-style-type: none"> • To identify international, national, regional and sub-regionally significant cultural assets and associated spatial issues (for example accessibility and quality). • To identify current and future strategic gaps in relevant provision, along with qualitative (e.g. ageing stock) and access issues, and establish priorities to address any shortfalls or improvements. • To identify mechanisms or policy approaches that ensure/facilitate appropriate provision at regional and local levels.

Theme	Objective	Tasks
Quality of the Environment	1) Update of the Environmental Policies in the WMRSS	
	The Phase Three Revision will be used to update and align the existing Quality of the Environment policies so as to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other Phase Three topics such as culture, sport and tourism.	To update policies QE2-9 of the existing WMRSS to reflect changes in national planning policy guidance and regional plans, strategies and initiatives, and to take account of the implications of the Habitat Regulations Assessment undertaken as part of the WMRSS Phase Two Revision.
	2) Integrated Approach to the Management of Environmental Resources	
	The Revision aims to develop a strategy for the protection, conservation, enhancement and management of regional environmental assets and resources, for their intrinsic value and wider social and economic benefits.	<ul style="list-style-type: none"> • To develop an overarching environmental policy to set the context for the more specific environmental policies in the Quality of the Environment chapter. • To investigate the potential of the environmental capacity approach as a means of informing the consideration of the Region's environmental limits, one of the guiding principles of sustainable development in the national strategy. • To establish a set of criteria or principles for guiding the protection, conservation, enhancement and management of the Region's environmental assets, including its green infrastructure, its landscape and tranquillity assets and the quality of its built environment, in terms of their current status, condition and future potential, and the wider social and economic benefits that the environmental assets are capable of delivering.
3) Flood Risk		
The WMRSS Revision will be used to consider the regional flood risk from all sources and set out a strategy for managing the risk.	<ul style="list-style-type: none"> • To undertake and review the Regional Flood Risk Appraisal. • To develop criteria for considering the flood risk of regionally significant development. • To bring forward adaptation options for existing development in any likely vulnerable areas and consider the impact of flooding on key infrastructure. • To develop a regionally specific Flood Risk Policy and consider the need for a surface water management policy. 	

Theme	Objective	Tasks
Quality of the Environment (Cont)	4) Energy	
	The Revision will seek to promote the development of renewable energy and low carbon technology resources, subject to appropriate environmental and social safeguards.	<ul style="list-style-type: none"> To review regional targets for renewable energy, as set by the Regional Energy Strategy. To develop a criteria-based policy for considering the provision of renewable energy resources. To develop a policy to promote the introduction of decentralised energy and renewable energy technologies into the region. To consider the potential for a requirement that a percentage of the energy needs of new development be provided by on-site or local generation of renewable energy resources/energy efficiency measures.
	5) Positive Uses of the Green Belt	
	<ul style="list-style-type: none"> The WMRSS Revision aims to consider the potential for a regionally specific policy for the Green Belt, to define its regional and sub-regional roles and the specific uses that should be encouraged within it, in the context of national Green Belt policy. NB. The Revision will not involve a review of Green Belt boundaries which will be dealt with as necessary as part of the WMRSS Phase Two process. 	<ul style="list-style-type: none"> To consider the recent pressures and changes in the West Midlands Green Belts and the need for a regional policy response. To define the specific roles of the different parts of the Green Belts in the Region. To examine the ways in which more positive uses of the Green Belts could contribute to the WMRSS, whilst remaining consistent with national Green Belt policy.
Minerals Policy	1) Safeguarding Minerals Resources	
	<ul style="list-style-type: none"> One of the national objectives for mineral planning is “to safeguard mineral resources as far as possible”, Minerals Planning Statement 1 (MPS1), paragraph 9. It is important that economically important minerals in the Region are not needlessly sterilised by surface development. The objective for the WMRSS Revision is to develop a policy for the safeguarding of brick clays (including fireclays), natural building and roofing stone and aggregates. 	<ul style="list-style-type: none"> To prepare a diagrammatic map of regionally important mineral resources – brick clays (including fireclays), natural building and roofing stone and aggregates. To develop a new policy on safeguarding regionally important mineral resources using existing mineral resource information and minerals and mineral related infrastructure.

Theme	Objective	Tasks
Minerals Policy (Cont)	2) Future Supplies of Construction Aggregates	
	<ul style="list-style-type: none"> • Construction aggregates (sand and gravel and crushed rock) are essential to built development, other construction and maintenance of infrastructure (e.g. roads, flood defences) and are therefore essential to delivering growth and Urban and Rural Renaissance. In order to maintain adequate supplies on the one hand, and protect valuable landscapes and communities on the other, a managed supply system operates nationally providing guidelines on regional provision. • The regional provision is apportioned sub-regionally through the WMRSS and currently covers the period up to 2016. The regional provision needs to be extended until 2026 and apportioned sub-regionally to reflect the occurrence, accessibility and availability of resources across the Region. This new apportionment, however, will need to take into account new revised national and regional guidelines which are expected to be published by Government in Autumn 2009. 	To examine and produce new sub-regional apportionments for the period 2007-2026.

This chapter explains what the SA aims to achieve, what work must be carried out to comply with statutory requirements, and how those requirements have been met.

3.1 WHAT IS A SUSTAINABILITY APPRAISAL?

Sustainability Appraisal (SA) aims **to promote sustainable development through the integration of social, economic and environmental consideration into plans, programmes and strategies.** Sustainability Appraisal is mandatory for Regional Spatial Strategies under Section 39(2) of the *Planning and Compulsory Purchasing Act 2004*. Therefore, an SA is being carried out as part of the Phase Two Revision of the West Midlands RSS.

This SA is being carried out in line with official guidance provided by ODPM. In particular, the appraisal process has been developed in reference to the ODPM's Guidance for Regional Planning Bodies and Local Planning Authorities on *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (issued in November 2005).

In line with guidance, this SA is designed to meet the requirements of EU *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment*, otherwise known as the Strategic Environmental Assessment (or SEA) Directive, as transposed into UK law by the *Environmental Assessment of Plans and Programmes Regulations 2004*. SEA is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes, and is required for Regional Spatial Strategies.

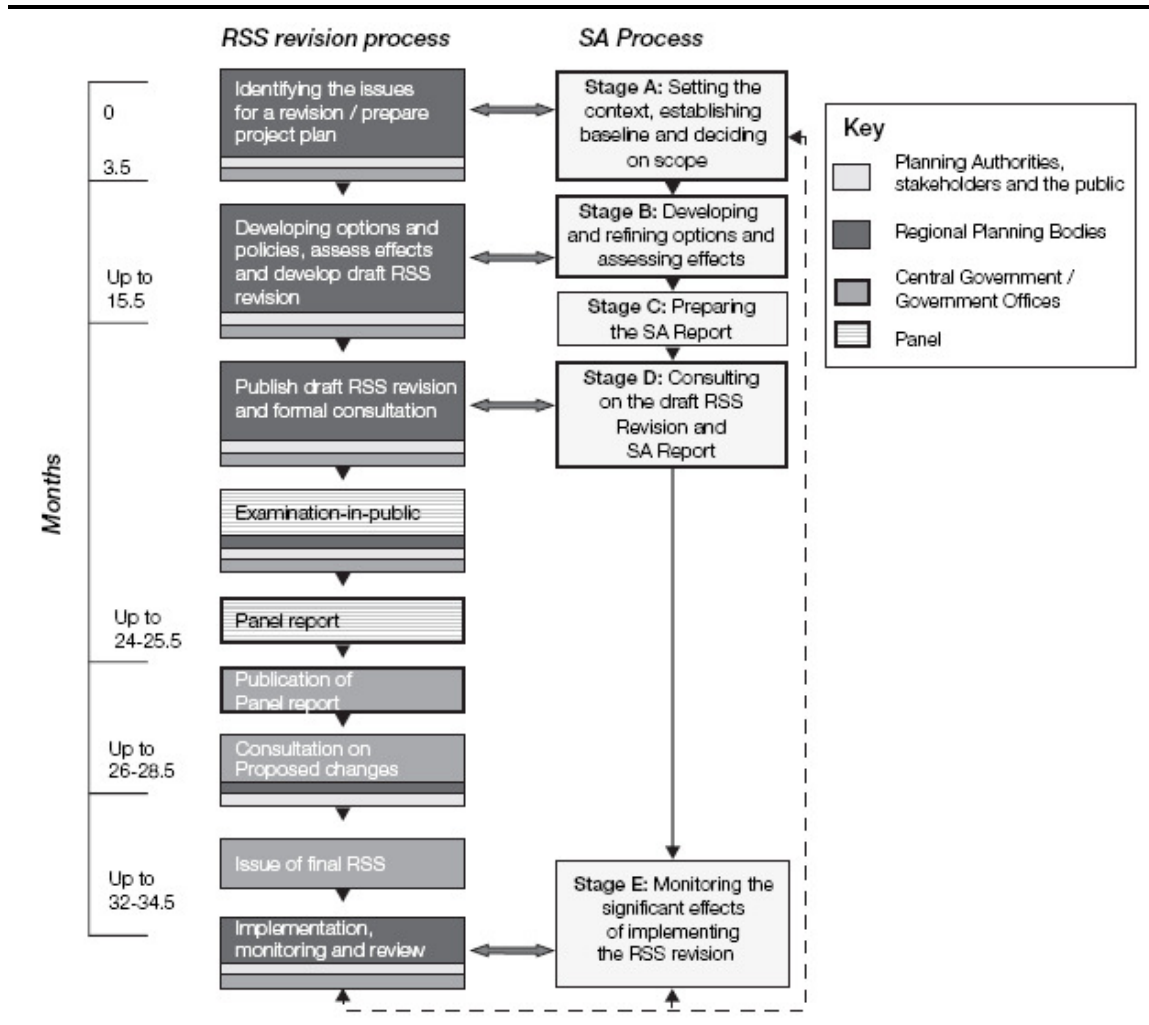
3.2 HOW DO YOU CARRY OUT A SUSTAINABILITY APPRAISAL?

Sustainability Appraisal is an iterative process that identifies and reports on the likely significant effects of the proposed plan, and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined. As such, the SA should:

- take a long-term view of whether and how the area covered by the plan is expected to develop;
- provide a mechanism for ensuring that sustainability objectives are translated into sustainable planning policies;
- reflect global, national, regional and local concerns; and
- provide an audit trail of how the plan has been revised to take into account the findings of the appraisal.

Moreover, Sustainability Appraisal must be an integral part of producing a draft revision of an RSS. As such, it follows five stages that are designed to link into the revision process, presented in *Figure 3.1*.

Figure 3.1 Regional Spatial Strategy Preparation Process, with SA Stages



Source: ODPM Guidance on Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents

Each of the five stages of SA is in turn broken down into a number of tasks with specific outputs, presented in *Figure 3.2* overleaf.

Figure 3.2 Sustainability Appraisal (SA) Stages and Tasks

RSS Stage	SA Stage	Task	Purpose	
1. Identify the issues for an RSS revision, prepare a project plan, including a statement of public participation	A. Setting the context and objectives, establishing the baseline and deciding on the scope	A1. Identifying other relevant policies, plans, programmes and sustainability objectives	To document how the plan is affected by outside factors and to suggest ideas for how constraints can be overcome	
		A2. Collecting baseline information	To provide an evidence base for the prediction of effects and for monitoring	
		A3. Identifying sustainability issues and problems	To ensure that the appraisal is focused, and to streamline subsequent stages, eg baseline data analysis, setting the Appraisal Framework etc	
		A4. Developing the SA Framework	To provide a means by which the sustainability of the plan can be assessed	
		A5. Consulting on the scope of the SA (5 weeks in duration)	To ensure that the appraisal covers the key sustainability issues, by consulting with statutory authorities and other relevant bodies on a <i>Scoping Report</i>	
	2. Develop options and policies, taking account of assessed effects and developing the draft RSS revision	B. Developing and refining options and assessing effects	B1. Testing the RSS revision objectives against the SA Framework	To ensure that the overall objectives of the plan are in accordance with agreed sustainability principles, and provide a framework for developing options
			B2. Developing the RSS revision options	To assist in the development and refinement of options, by identifying potential sustainability effects of options for achieving plan objectives
			B3. Predicting the effects of the RSS revision	To identify and describe the social, economic and environmental effects of the plan options
			B4. Evaluating the effects of the RSS revision	To evaluate the significance of the predicted effects, and to assist in the refinement of the plan
			B5. Considering ways of mitigating adverse effects and maximising beneficial effects	To ensure all potential mitigation measures and measures for maximising beneficial effects are considered, and as a result residual effects identified
B6. Proposing measures to monitor the significant effects of implementing the RSS revision			To detail the means by which the sustainability performance of the plan can be assessed	
	C. Preparing the Sustainability Appraisal Report	C1. Preparing the SA Report	To provide a detailed account of the process, including findings and how it influenced the plan, for consultation	

RSS Stage	SA Stage	Task	Purpose
3, 4, 5. Submission of the Draft RSS revision to the Secretary of State, Examination in Public, and the Panel report	D. Consulting on the draft RSS revision and SA Report	D1. Consulting on the draft RSS revision and SA Report (6-12 weeks in duration)	To provide the public and statutory bodies with an opportunity to express their opinion on the <i>SA Report</i> , and to use it as a reference point in commenting on the plan
6, 7. Publication of proposed changes and issue of revised RSS		D2. Appraising any significant changes proposed by the Secretary of State	To ensure that any significant changes to the plan are assessed for their sustainability implications, and to influence the revision of the plan
8. Implementation, monitoring and review		D3. Making decisions and providing information	To provide information on how the <i>SA Report</i> and consultees' opinions were taken into account in preparing the plan
	E1. Finalising aims and methods for monitoring	To provide information that can be used to highlight specific performance issues and significant effects associated with plan implementation	
	E. Monitoring the significant effects of implementing the RSS revision	E2. Responding to adverse effects	To react to adverse effects identified through monitoring

The SA process for Phase Three can be seen as having the following elements, as follows:

- Scoping (Tasks A1 to A5 of the ODPM process model)
- SA of Draft Policy Options (Tasks B1 to B4), including
- Consultation on the SA of the Draft Policy Options
- SA of the Draft Preferred Policy Options (Tasks B3 to B6 and C1)
- Consultation on the SA of the Draft Preferred Policy Options (Tasks D1 to D3)

The first two elements listed above are now complete. This report is the key output resulting from from the SA of policy options, and provides the basis for consultation.

A summary of the key points from the Scoping stage is presented in *Section 4*. Most of the remainder of this report (*Sections 5 to 7*) presents the findings of work carried out under the SA of options (in particular, testing the RSS and revision objectives, and appraising the Options Paper).

This chapter explains the process of developing the *Scoping Report* in 2008, and presents the Sustainability Appraisal Framework which is being used to appraise proposals put forward as part of the Phase Three Revision.

4.1 PREPARATION OF THE SCOPING REPORT

Work on the Sustainability Appraisal for Phase Three of the RSS began in November 2007. early work was focused around the production of, and consultation on, a *Scoping Report*. The purpose of the *Scoping Report* is to **set out the scope of the Sustainability Appraisal of the Phase Three Revision of the West Midlands RSS**. In particular, the scoping phase led to the development of the Sustainability Appraisal Framework. The SA Framework sets out the questions which are now being used to ‘interrogate’ and appraise the options being developed as part of the Phase Three Revision process.

In line with the requirements of official ODPM guidance, developing the *Scoping Report* involved:

- identifying and reviewing other relevant policies, plans, programmes and sustainability objectives;
- collecting and reviewing baseline information;
- identifying sustainability issues and problems in the West Midlands;
- developing the Sustainability Appraisal Framework.

The *Scoping Report* was drafted between December 2007 and April 2008.

4.2 CONSULTATION

Consultation on the *Scoping Report* took place between 14 April and 13 June 2008 (8 weeks). The report was distributed to a wide range of statutory environmental consultation bodies and other stakeholders, and written responses were received from:

- Sport England
- West Midlands Regional Assembly, Transport Policy Lead
- Environment Agency
- English Heritage
- Highways Agency
- Birmingham City Council
- Advantage West Midlands
- West Midlands Regional Assembly, Environment Policy Officer
- Natural England

- Black Country Consortium
- West Midlands Geodiversity Partnership
- Woodland Trust

Following consultation some aspects of the *Scoping Report* were amended and updated, in particular the review of baseline conditions, the review of key sustainability issues, and the SA Framework.

4.3 THE SUSTAINABILITY APPRAISAL FRAMEWORK

4.3.1 Basis for the Framework – Appraisal Objectives

The Framework is based on the 33 objectives set out in the Regional Sustainable Development Framework. These are taken as the objectives for the Sustainability Appraisal.

4.3.2 Core Objectives

All but four of the objectives of the RSDF have been included in the SA Framework, and turned into 29 **core appraisal questions**, which can be used to interrogate options and proposals, and/or to present an overall assessment of the implications of the revision for that RSDF issue. The following RSDF objectives have been omitted, on the grounds that Phase Three of the RSS Revision will not impact on, affect or deliver the objectives:

- RSDF Objective 1.9: Encourage corporate social and environmental responsibility, with regional organisations and agencies leading by example.
- RSDF Objective 1.10: Encourage and support a culture of enterprise and innovation, including social enterprise.
- RSDF Objective 4.1: Enable communities to influence the decisions that affect their neighbourhoods and quality of life.
- RSDF Objective 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.

4.3.3 Subsidiary Questions

Some of the 29 core appraisal objectives are self-explanatory, and can act as stand-alone appraisal questions in their own right. However, others are generic and do not on their own provide a suitable basis for appraising proposals. Therefore, a set of **subsidiary appraisal questions** have been developed to address more detailed issues that:

- are particularly relevant to Phase Three of the RSS Revision in terms of deliverability (ie Phase Three can be expected to deliver key aspects of an RSDF objective) or influence (ie Phase Three can be expected to be a major influence on the achievement of an RSDF objective);
- reflect the objectives and targets from the review of other plans and strategies; and
- focus on the key sustainability issues and problems in the Region.

It should be noted that some appraisal questions are more useful for understanding cross-cutting issues, while others are more focused on specific issues at policy level. This reflects the nature and scope of the RSS.

4.4 THE SUSTAINABILITY APPRAISAL FRAMEWORK

The Sustainability Appraisal Framework is set out in *Table 4.1*. **Core appraisal questions are set out in bold.**

Table 4.1 Sustainability Appraisal Framework

RSDF Topic/Objective	Will the option/proposal...
Sustainable Consumption and Production	
RSDF 1.1: Natural Resource Use – Water and Minerals	<ul style="list-style-type: none"> • Use natural resources such as water and minerals efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment? • Ensure the sustainable use of water resources? • Ensure prudent, efficient and sustainable use of minerals and recycling of materials, thereby minimising the requirement for new primary extraction? • Safeguard mineral resources as far as possible?
RSDF 1.2: High Value and Low Impact Technologies	<ul style="list-style-type: none"> • Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives?
RSDF 1.3: Sustainable Construction and Design	<ul style="list-style-type: none"> • 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?
RSDF 1.4 and 1.5: Transport	<ul style="list-style-type: none"> • 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? • 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? • ensure that, for development outside the major urban areas, measures are in place to reduce the need to travel by private car and increase the use of public transport, cycling and walking? • reduce the number and length of journeys made by car? • reduce the need to travel, eg through local provision of services? • 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? • promote a shift of freight from road to rail?
RSDF 1.6: Waste Management	<ul style="list-style-type: none"> • 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? • Prevent or minimise production of mineral waste? • Promote the recycling of suitable materials for aggregate?
RSDF 1.7: Local Sourcing	<ul style="list-style-type: none"> • Encourage local sourcing of food, goods and materials?

RSDF Topic/Objective	Will the option/proposal...
RSDF 1.8: Developing Alternative and Renewable Resources	<ul style="list-style-type: none"> • Reward efficient resource use and encourage development of alternative and renewable resources in order to reduce dependence on fossil fuels?
RSDF 1.9: Corporate Social Responsibility	No questions
RSDF 1.10: Enterprise and Innovation	No questions
RSDF 1.11: Economy and Prosperity	<ul style="list-style-type: none"> • Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Region's inhabitants? • Support the development of the rural economy? • Support the development of forestry? • Support the development of the energy sector? • Support the development of the cultural, sport and tourism sectors? • Support the development of the environmental economy?
Climate Change and Energy	
RSDF 2.1: Energy Efficiency	<ul style="list-style-type: none"> • Reduce overall energy use through increased energy efficiency?
RSDF 2.2: Renewable and Low Carbon Energy	<ul style="list-style-type: none"> • Increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating, and in transportation? • Ensure that 10% of electricity supplies is provided from renewable energy sources by 2010, and 20% by 2020?
RSDF 2.3: Climate Change Mitigation	<ul style="list-style-type: none"> • Minimise the Region's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?
RSDF 2.4: Climate Change Adaptation	<ul style="list-style-type: none"> • 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?
RSDF 2.5: Flood Risk	<ul style="list-style-type: none"> • Promote land use and development that takes into account predicted changes in the Region's climate including flood risk? • promote land use and development into areas at lowest flood risk? • encourage more strategic management of surface water? • support measure that protect key infrastructure? • encourage resistance and resilience measure in existing properties?
Natural Resource Protection and Environmental Enhancement	
RSDF 3.1: Environmental and Historic Assets	<ul style="list-style-type: none"> • 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,

RSDF Topic/Objective	Will the option/proposal...
	<p>AONBs etc)?</p> <ul style="list-style-type: none"> • 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?
RSDF 3.2: Biodiversity	<ul style="list-style-type: none"> • Value, maintain, restore and re-create regional biodiversity, where possible using approaches that improve the resilience of natural systems such as linking fragmented habitats? • Ensure that there are no significant adverse effects on International Sites? • value, enhance and protect the Region’s priority habitats and species, and promote the delivery of regional biodiversity targets? • Value and protect the Region’s geodiversity? • Promote the development of new biodiversity assets? • Ensure that biodiversity assets can adapt to expected future climate change?
RSDF 3.3: Pollution	<ul style="list-style-type: none"> • Minimise air, water, soil, light and noise pollution levels and create good quality air, water and soils? • 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?
RSDF 3.4: Use of Previously Developed Land and Buildings	<ul style="list-style-type: none"> • Encourage land use and development that optimises the use of previously developed land and buildings? • encourage an integrated and strategic approach to brown field development?
RSDF 3.5: High Quality Built Environments	<ul style="list-style-type: none"> • 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? • 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, and within 500m of woodland in excess of 2ha in size)? • support the an integrated approach to development of green space for the provision of multifunctional benefits such as flood risk management, groundwater recharge, pollution control and the provision of space for people and wildlife?

RSDF Topic/Objective	Will the option/proposal...
	<ul style="list-style-type: none"> require good urban design to create attractive, high quality environments where people will choose to live, work and invest, in line with CABE Building for Life principles? encourage the incorporation of geodiversity features where possible thus contributing to local character and distinctiveness and reinforcing a sense of place?
RSDF 3.6: Local Stewardship	<ul style="list-style-type: none"> Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation?
Sustainable Communities	
RSDF 4.1: Empowering Communities	No questions
RSDF 4.2: Access to Services, Facilities and Opportunities	<ul style="list-style-type: none"> 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 good accessibility to local facilities, services and opportunities that reduce the need to travel?
RSDF 4.3: Poverty and Disadvantage	<ul style="list-style-type: none"> Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage?
RSDF 4.4: Health	<ul style="list-style-type: none"> 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? ensure that infrastructure for healthcare is provided to meet projected future demand and need? promote healthy lifestyles and opportunities for physical activity? promote opportunities to participate in sport and recreation?
RSDF 4.5: Meeting Housing Needs	<ul style="list-style-type: none"> 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?
RSDF 4.6: Crime	<ul style="list-style-type: none"> Reduce crime, fear of crime and antisocial behaviour? encourage the adoption of principles to 'design out' crime in housing and employment sites?
RSDF 4.7: Cultural, Sporting and Recreational Opportunities	<ul style="list-style-type: none"> 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, enhanced and provided? ensure that facilities and locations for sporting activities are protected, enhanced and provided? protect, enhance and create high quality or valued recreational spaces and avoid erosion of recreational function?
RSDF 4.8: Balanced Development, Sustainable Communities	<ul style="list-style-type: none"> 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?

RSDF Topic/Objective	Will the option/proposal...
	<ul style="list-style-type: none"> • ensure that employment opportunities are accessible to all communities?
RSDF 4.9: Skills and the Workforce	No questions
RSDF 4.10: Investment in Future Prosperity	<ul style="list-style-type: none"> • Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development? • encourage investment to develop deprived areas and focusing resources in areas of greatest need? • ensure that education infrastructure meets projected future demand and need?

This chapter sets out a review of the extent to which the Strategic Objectives of the RSS and the Phase Three Revision Objectives are compatible with (ie promote the achievement of) the 33 objectives from the Regional Sustainable Development Framework.

5.1 INTRODUCTION

Official guidance on SA explains that ‘it is important for the objectives of the RSS revision to be in accordance with sustainability principles... The objectives should be tested for compatibility with the SA objectives’.

Two sets of objectives were reviewed in terms of their compatibility with the 33 RSDF objectives (which have been adopted as the objectives for this SA):

1. Ten **Strategic Objectives of the RSS**. These objectives were set out in the RSS document that was approved in June 2004. It is intended that the Phase Three revision will develop and strengthen, rather than change, these objectives.
2. Fifteen **Revision Objectives**, which have been established to define the scope of the Phase Three revision.

Of key importance has been to identify any areas where there may be tensions or conflicts between the sets of objectives, in particular to identify where the RSS/Revision objectives may prevent the achievement of the Region’s RSDF objectives.

5.2 RSS OBJECTIVES

The ten strategic objectives of the RSS are presented below.

Figure 5.1 Strategic Objectives of the RSS

- a) to make the Major Urban Areas of the West Midlands increasingly attractive places where people want to live, work and invest;
- b) to secure the regeneration of the Rural Areas of the Region;
- c) to create a joined-up multi-centred Regional structure where all areas/centres have distinct roles to play;
- d) to retain the Green Belt, but allow an adjustment of boundaries where this is necessary to support urban regeneration;
- e) to support the cities and towns of the Region to meet their local and sub regional development needs;
- f) to support the diversification and modernisation of the Region’s economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion;
- g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region;
- h) to improve significantly the Region’s transport systems;
- i) to promote the development of a network of strategic centres across the Region; and
- j) to promote Birmingham as a world city.

A matrix illustrating the compatibility of RSS objectives with the RSDF objectives is presented in *Table 5.1* overleaf.

Table 5.1 Compatibility of RSS Objectives

✓ = positive compatible, ∅ = neutral, ? = uncertain, ✖ = possible conflict, ✓/? = mixed

Is the objective likely to...	a) to make the Major Urban Areas of the West Midlands increasingly attractive places where people want to live, work and invest	b) to secure the regeneration of the Rural Areas of the Region	c) to create a joined-up multi-centred Regional structure where all areas/centres have distinct roles to play	d) to retain the Green Belt, but allow an adjustment of boundaries where this is necessary to support urban regeneration	e) to support the cities and towns of the Region to meet their local and sub regional development needs	f) to support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion	g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region	h) to improve significantly the Region's transport systems	i) to promote the development of a network of strategic centres across the Region	j) to promote Birmingham as a world city
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	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅
1.2 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives	∅	∅	∅	∅	∅	✓?	∅	∅	∅	∅
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	∅	∅	∅	∅	∅	∅	✓?	∅	∅	∅
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	✓?	?	?	∅	?	?	✓?	✓?	?	∅
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	✓✓	?	?	✓	?	?	✓?	✓	?	✓
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	∅	∅	∅	∅	∅	?	✓?	?	∅	∅
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	∅	∅	∅	∅	∅	?	✓	∅	∅	∅
1.9 Encourage corporate social and environmental responsibility, with regional organisations and agencies leading by example	∅	∅	∅	∅	∅	?	✓?	∅	∅	∅
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	✓	✓	✓	∅	✓	✓	✓	✓	✓	✓
2.1 Reduce overall energy use through increased energy efficiency	∅	∅	∅	∅	∅	?	✓?	✓?	∅	∅

Is the objective likely to...	a) to make the Major Urban Areas of the West Midlands increasingly attractive places where people want to live, work and invest	b) to secure the regeneration of the Rural Areas of the Region	c) to create a joined-up multi-centred Regional structure where all areas/centres have distinct roles to play	d) to retain the Green Belt, but allow an adjustment of boundaries where this is necessary to support urban regeneration	e) to support the cities and towns of the Region to meet their local and sub regional development needs	f) to support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion	g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region	h) to improve significantly the Region's transport systems	i) to promote the development of a network of strategic centres across the Region	j) to promote Birmingham as a world city
2.2 Increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating, and in transportation	∅	∅	∅	∅	∅	✓?	✓?	∅	∅	∅
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	?	?	?	∅	?	?	✓?	?	?	∅
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	?	?	?	✓?	?	∅	✓?	∅	?	?
2.5 Land use and development that takes into account predicted changes in the Region's climate including flood risk	?	?	?	✓?	?	∅	✓?	∅	?	?
3.1 Value, protect, enhance and restore the Region's environmental assets, including the natural, built and historic environment and landscape	?	?	?	✓?	?	?	✓	?	?	∅
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	?	?	?	?	∅	?	✓	?	∅	∅
3.3 Minimise air, water, soil, light and noise pollution levels and create good quality air, water and soils	?	?	?	∅	?	?	✓	?	?	∅
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	✓	?	?	✓	?	?	✓	∅	∅	✓?
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	✓	?	✓?	?	✓?	∅	✓	✓?	∅	?
4.1 Enable communities to influence the decisions that affect their neighbourhoods and quality of life	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	✓	✓	✓	∅	✓	∅	∅	✓	✓	∅
4.3. Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage	✓	✓	✓	∅	✓	✓	∅	✓	✓	∅
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	∅	∅	∅	∅	∅	∅	✓?	?	∅	∅

Is the objective likely to...	a) to make the Major Urban Areas of the West Midlands increasingly attractive places where people want to live, work and invest	b) to secure the regeneration of the Rural Areas of the Region	c) to create a joined-up multi-centred Regional structure where all areas/centres have distinct roles to play	d) to retain the Green Belt, but allow an adjustment of boundaries where this is necessary to support urban regeneration	e) to support the cities and towns of the Region to meet their local and sub regional development needs	f) to support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion	g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region	h) to improve significantly the Region's transport systems	i) to promote the development of a network of strategic centres across the Region	j) to promote Birmingham as a world city
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	✓	✓	✓	∅	✓	∅	∅	∅	✓	∅
4.6 Reduce crime, fear of crime and antisocial behaviour	∅	∅	∅	∅	∅	✓?	∅	∅	∅	∅
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	∅	∅	∅	✓	∅	∅	✓?	✓	∅	∅
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	✓	✓	✓	✓	✓	✓	∅	∅	✓	∅
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	∅	∅	∅	∅	∅	✓?	∅	∅	∅	∅
4.10 Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development	?	?	?	∅	?	✓?	∅	✓	?	✓

5.2.1 Key Findings

In summary, **none of the RSS objectives appear to be unequivocally incompatible with the RSDF objectives.**

However, it should be noted that many RSS objectives are very broad, covering a range of different (albeit interrelated) issues, and are not always sufficiently specific to facilitate analysis. For example, it is not clear what would be involved by ‘the diversification and modernisation of the Region’s economy’, ‘improve significantly the Region’s transport systems’, ‘support cities/towns to meet their local and sub-regional development needs’, or ‘promote Birmingham as a world city’, and whether implementation of these objectives would help to promote the achievement of many of the RSDF’s objectives, particularly the environmental objectives (eg reduced energy use, promotion of renewables, reduced pollution, development of biodiversity etc).

The following objectives may have uncertain or negative implications for some aspects of environmental sustainability, depending on their precise meaning and implementation:

- a) to make the Major Urban Areas of the West Midlands increasingly attractive places where people want to live, work and invest
- b) to secure the regeneration of the Rural Areas of the Region
- c) to create a joined-up multi-centred Regional structure where all areas/centres have distinct roles to play
- d) to retain the Green Belt, but allow an adjustment of boundaries where this is necessary to support urban regeneration
- e) to support the cities and towns of the Region to meet their local and sub regional development needs
- f) to support the diversification and modernisation of the Region’s economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion
- h) to improve significantly the Region’s transport systems
- i) to promote the development of a network of strategic centres across the Region

Economic development, regeneration and growth can potentially result in increased waste and pollution and increased pressure on environmental assets in general. ‘Smart growth’, whereby economic activities are ‘decoupled’ from resource use and waste, could allow these RSS objectives to be fulfilled without compromising the achievement of the environmental objectives from the IRF.

5.3 PHASE THREE REVISION OBJECTIVES

The 15 Phase Three Revision objectives are presented below.

Figure 5.2 Phase Three Revision Objectives

<p>Critical Rural Services</p> <p>A. To identify and prioritise the services that are critical to the sustainability of rural communities in different parts of the Region, and to identify the mechanisms for promoting their provision.</p> <p>Sites for Gypsies, Travellers and Travelling Showpeople</p> <p>B. To significantly increase the number of Gypsy and Traveller sites across the West Midlands, to address existing under provision as indicated in the Regional Interim Statement and anticipated in the sub-regional housing market area Gypsy and Traveller Accommodation Assessments (GTAAs)</p> <p>C. To ensure there are sufficient plots in the Region to meet the accommodation needs of Travelling Showpeople</p> <p>D. To ensure that all revised Gypsy and Traveller and Travelling Showpeople policies in the WMRSS, Local Development Frameworks (LDFs) and other regional and sub-regional strategies recognise, protect and ensure a traditional travelling way of life for Gypsies and Travellers and Travelling Showpeople, whilst also respecting the interests of settled communities</p> <p>E. To ensure that all Development Plan Documents (DPDs) include fair, realistic and inclusive policies in relation to the accommodation needs of Gypsies and Travellers and Travelling Showpeople and that the potential for Gypsies and Travellers and Travelling Showpeople to be evicted and thereby become homeless is avoided.</p> <p>Culture, Sport and Tourism</p> <p>F. Improve physical and mental wellbeing by encouraging healthier, more active lifestyles and greater and more inclusive access to, and participation in, cultural activities</p> <p>G. Make the Region more attractive to residents and in-movers as a result of the cultural offer</p> <p>H. Support the growth and diversification of the regional economy to create a 'world class' visitor destination.</p> <p>Quality of the Environment</p> <p>I. Update of the Environmental Policies of the RSS: The Phase Three Revision will be used to update and align the existing Quality of the Environment policies so as to ensure consistency with current national guidance and regional plans, strategies and initiatives. This will also include making appropriate links to other Phase Three topics such as culture, sport and tourism.</p> <p>J. Integrated Approach to the Management of Environmental Resources: The Revision aims to develop a strategy for the protection, conservation, enhancement and management of regional environmental assets and resources, for their intrinsic value and wider social and economic benefits.</p> <p>K. Flood Risk: The WMRSS Revision will be used to consider the regional flood risk from all sources and set out a strategy for managing the risk.</p> <p>L. Energy: The Revision will seek to promote the development of renewable energy and low carbon technology resources, subject to appropriate environmental and social safeguards</p> <p>M. Green Belt: The WMRSS Revision aims to consider the potential for a regionally-specific policy for the Green Belt, to define its regional and sub-regional roles and the specific uses that should be encouraged within it, in the context of national Green Belt policy</p> <p>Minerals</p> <p>N. Safeguarding Mineral Resources. It is important that economically important minerals in the Region are not needlessly sterilised by surface development. The objective for the WMRSS Revision is to define these valuable resources on a map and develop a policy for the safeguarding of brick clays, natural building and roofing stone and aggregates.</p> <p>O. Future Supplies of Construction Aggregates. to develop a regional guideline for production of construction aggregates for the period 2007-2026, to maintain adequate supplies on the one hand, and protect valuable landscapes and communities on the other, and to apportion production locally by Mineral Planning Authority.</p>
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A matrix illustrating the compatibility of Phase Three Revision Objectives with the RSDF objectives is presented in *Table 5.2* overleaf.

Table 5.2 Compatibility of Phase Three Objectives

✓ = positive compatible, ∅ = neutral, ? = uncertain, ✖ = possible conflict, ✓/? = mixed

Is the objective likely to...	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
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	∅	∅	∅	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅	✓?	✓?
1.2 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅
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	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	?	∅	∅	∅	∅	✓	∅	?	∅	∅	∅	∅	∅	∅	∅
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	∅	∅	∅	∅	∅	∅	∅	?	∅	∅	∅	∅	✓?	∅	∅
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	∅	∅	∅	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅	?	?
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	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅
1.9 Encourage corporate social and environmental responsibility, with regional organisations and agencies leading by example	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	✓	✓	✓	∅	∅	∅	✓	✓	∅	✓	∅	✓	∅	✓	✓
2.1 Reduce overall energy use through increased energy efficiency	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
2.2 Increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating, and in transportation	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅
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	?	∅	∅	∅	∅	∅	∅	✖	∅	∅	∅	✓	∅	∅	∅
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	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅	∅
2.5 Land use and development that takes into account predicted changes in the Region's climate including flood risk	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	✓	∅	∅	∅	∅
3.1 Value, protect, enhance and restore the Region's environmental assets, including the natural, built and historic environment and landscape	?	?	?	∅	∅	∅	∅	∅	✓	✓	∅	✓?	✓	?	?
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	?	?	?	∅	∅	∅	∅	∅	✓	✓	∅	✓?	✓	?	?
3.3 Minimise air, water, soil, light and noise pollution levels and create good quality air, water and soils	?	?	?	∅	∅	∅	∅	∅	✓	✓	∅	∅	∅	?	?
3.4 Encourage land use and development that optimises the use of previously developed land and buildings	?	?	?	∅	∅	∅	∅	∅	✓	✓	∅	∅	✓	∅	∅

Is the objective likely to...	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
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	?	?	?	∅	∅	∅	∅	∅	✓	✓	∅	∅	✓	∅	∅
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	∅	✓	✓	✓	∅	∅	∅	∅	✓	✓	∅	∅	∅	∅	∅
4.1 Enable communities to influence the decisions that affect their neighbourhoods and quality of life	∅	?	?	✓	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	✓	✓	✓	∅	✓	✓	∅	∅	∅	∅	∅	∅	∅	∅	∅
4.3. Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage	∅	✓	✓	✓	✓	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	✓	✓	✓	∅	✓	✓	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	∅	✓	✓	✓	✓	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
4.6 Reduce crime, fear of crime and antisocial behaviour	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	∅	✓	✓	∅	∅	✓	✓	✓	✓	∅	∅	∅	∅	∅	∅
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	✓	✓	✓	✓	✓	✓	∅	∅	∅	∅	∅	∅	∅	∅	∅
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	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅
4.10 Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅	∅

5.3.1 Key Findings

The review of Phase Three objectives against the RSDF objectives suggests that there are very few where a conflict is very likely to arise, and many RSDF objectives are broadly supported by the Revision objectives.

No Implications

A small number of the RSDF objectives will not be affected by the achievement of the objectives for Phase Three of the Revision:

- 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 – this issue has been addressed under Phase 2 and none of the policy areas will impact on it.
- 3.6 Encourage local stewardship of local environments, for example by promoting best practice in agricultural management or enabling communities to improve their neighbourhoods – none of the policy areas are looking to promote local stewardship as a means of protecting and managing the environment.
- 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 – none of the policy areas aim to impact on the skills agenda.
- 4.10 Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development – none of the policy areas aim to impact on the skills agenda.

Positive Implications

Some RSDF objectives will be broadly supported by Phase Three:

- 1.2 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives – in particular by policies on energy.
- 1.8 Reward efficient resource use and encourage development of alternative and renewable resources in order to reduce dependence on fossil fuels – in particular by policies on energy.
- 1.10 Encourage and support a culture of enterprise and innovation, including social enterprise – in particular by policies on energy
- 1.11 Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Region’s inhabitants – supported by policies on critical rural services, Gypsies and Travellers, culture, sport and tourism, environment, energy and minerals.
- 2.2 Increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating, and in transportation – in particular by policies on energy.

- 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 – in particular by policies on flood risk.
- 2.5 Land use and development that takes into account predicted changes in the Region's climate including flood risk – in particular by policies on flood risk.
- 3.7 Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation – particularly by policies on Gypsies and Travellers, and on the environment.
- 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 – particularly by policies on critical rural services, Gypsies and Travellers, and culture, sport and tourism
- 4.3. Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage – particularly by policies on Gypsies and Travellers
- 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 – particularly by policies on critical rural services, Gypsies and Travellers, and culture, sport and tourism.
- 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 – particularly by policies on Gypsies and Travellers.
- 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 – particularly by policies on culture, sport and tourism.
- 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 – particularly by policies on critical rural services, Gypsies and Travellers, and culture, sport and tourism.

Unclear Implications

Other policies could be affected positively or negatively by the achievement of some of the Phase Three objectives, depending on how they are implemented:

- 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 – in particular, how critical rural services are provided (which could result in increased use of the private car for some rural communities), and how cultural assets are developed (which could result in more car transport as well as travel from overseas).
- 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 – in particular, how critical rural services are provided (which could result in increased use of the private car for some rural communities), and how cultural assets are developed (which could result in more car transport as well as travel from overseas).

- 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 – in particular how critical rural services are provided, which could result in increased use of the private car for some rural communities.
- 3.1 Value, protect, enhance and restore the Region’s environmental assets, including the natural, built and historic environment and landscape – in particular, how the revision handles the provision of critical rural services, accommodation for Gypsies and Travellers, the safeguarding of minerals and future supply of construction aggregates.
- 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 – in particular, how the revision handles the provision of critical rural services, accommodation for Gypsies and Travellers, the safeguarding of minerals and future supply of construction aggregates.
- 3.3 Minimise air, water, soil, light and noise pollution levels and create good quality air, water and soils – in particular, how the revision handles the provision of critical rural services, accommodation for Gypsies and Travellers, the safeguarding of minerals and future supply of construction aggregates.
- 3.4 Encourage land use and development that optimises the use of previously developed land and buildings – in particular, how the revision handles the provision of critical rural services, and accommodation for Gypsies and Travellers.
- 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 – in particular, how the revision handles the provision of critical rural services, and accommodation for Gypsies and Travellers.
- 4.1 Enable communities to influence the decisions that affect their neighbourhoods and quality of life – in particular, how the revision handles the provision of accommodation for Gypsies and Travellers.

Negative Implications

There is only one RSDf objective which seems likely to be undermined by a Phase Three objective:

- 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 – which it seems conflicts with the revision objective to ‘create a ‘world class’ visitor destination’.

5.3.2 Recommendations

Revision Objectives with Unclear Implications

As listed above, there are a range of Revision Objectives which could have either positive or negative implications for RSDf Objectives, depending on how they are implemented. It is not proposed that these objectives be changed. Instead, where possible, recommendations are made on the draft policies and options, to ensure that potential negative impacts are avoided and positive effects are maximised.

Revision Objectives with Negative Implications

The objective for culture, sport and tourism – to create a ‘world class’ visitor destination – seems likely to conflict with the RSDf objective to mitigate climate change. It seems that the intention to improve the region’s cultural assets aims to attract visitors from overseas, as well as visitors from within the region and from the UK as a whole.

However, depending on how the policy on culture, sport and tourism (PA10) is drafted, this apparent conflict could be addressed. For example, if the policy focuses on the improvement/development of assets of regional and national importance, then the policy could be seen to support the objective of reducing greenhouse gas emissions: the region could become an attractive tourism destination for UK residents who would otherwise travel abroad; and West Midlands residents would not need to travel so far (within or outside the region) to access cultural assets.

Therefore it is not thought necessary to change the Revision objective. Instead, we have made suggestions on how the policy options for PA10 could be drafted to ensure that this potential problem is addressed.

This chapter explains how the Phase Three policy options have been developed, discusses how the SA of options has been carried out, and then looks at each of the five policy topic areas in turn, firstly describing the options put forward for consultation and secondly summarising the findings and analysis from the Sustainability Appraisal on each policy option.

6.1 INTRODUCTION

According to the ODPM's statutory guidance on SA of RSSs, RPBs are required to 'develop options, working with the community and relevant stakeholders, to achieve the objectives of the RSS revision'. The guidance explains: 'Only reasonable, realistic and relevant options need to be put forward. [For the purposes of the SA] it is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the implications of each.'

Under the statutory SA process, RSS options must be appraised – in particular by identifying potential sustainability effects of options for achieving plan objectives – so that options can be developed and refined accordingly.

6.2 DEVELOPMENT OF OPTIONS

Development of options for achieving the objectives of the Phase Three RSS Revision has been in progress since October 2008, led by the WMRA Policy Leads team.

A final set of options have been in development since February 2009, and are now outlined in a consultation document entitled *West Midlands Regional Spatial Strategy Phase Three Revision – Options* (known as the 'Phase Three Options Paper'). This paper was submitted to the Assembly Board of Directors on 25 March 2009, and issued for public consultation on 29 June 2009.

According to the Phase Three Options Paper, choices or directions that can be taken for the Region have been set out on critical rural services, provision for gypsies and travellers, culture, sport and tourism provision, quality of the environment and minerals.

It should be noted that clear options (ie alternative scenarios that can be assessed and compared) have not been developed for all of the topic areas. In some areas it was concluded by the Policy Leads team that it was better to set out 'issues' and questions to which consultees could respond.

6.3 HOW THE OPTIONS APPRAISAL HAS BEEN CARRIED OUT

6.3.1 Iterative Appraisal

Options appraisal has been an iterative process. Options development began in October 2008, and an initial round of appraisal was carried out in November on early options for provision for gypsies and travellers, culture, sport and tourism provision, quality of the environment and minerals. Early options on critical rural services were appraised in February 2009. Each set of

draft options were appraised using the SA Framework, and findings/recommendations were issued to the Policy Leads in the form of topic reports. A formal meeting with relevant Policy Leads was also held on 23 February to discuss the findings and recommendations from the initial round of appraisal work. The initial appraisal findings were a key input into the development of the Options Paper.

6.3.2 Prediction and Evaluation of Likely Significant Effects

The effects arising from proposals in the Options Paper have been predicted and evaluated using the SA Framework and are set out in full in *Annex A*. In general, the appraisal does not quantify effects, and for many issues only a qualitative appraisal can be made. Each option has been individually appraised in terms of whether it is likely to make a positive or negative contribution towards the achievement of each issue specified by the SA Framework. In this way, comparisons between the options are explored in general terms. A commentary is provided to explain issues in more detail, and covers aspects such as the geographic scale and location of effects, time periods, the likelihood of effects occurring and whether an effect arises as a direct or indirect consequence of the proposed policy intervention. The effects have been predicted and evaluated largely using professional judgment to decide the nature, likelihood and significance of effects, drawing where possible on the available baseline data set out in the *Scoping Report* and taking account of any available information in the Options Paper on the likely geographical distribution of activities or interventions.

6.3.3 Mitigation Measures

The options appraisal stage has primarily focused on understanding the relative implications of the various proposals that are being put forward for consultation, so that consultees are in a good position to judge the relative merits and impacts of the different proposals.

Developing mitigation measures has been a secondary consideration at the options appraisal stage, as the Options Paper is simply putting forward ideas for consultation and is not proposing a way forward for implementation. A greater emphasis will be placed on mitigation measures when the Preferred Option and Policies are drafted following consultation.

Nevertheless, despite the fact that mitigation is not the key focus for options appraisal, this stage has provided some recommendations on measures to mitigate the major impacts and shortcomings of initial proposals. For example, the detailed appraisal of each topic contains suggestions on issues which could be addressed so that those topics promote SA/RSDf objectives more effectively.

6.3.4 Limitations and Uncertainties

It should be noted that there were a number of limitations and uncertainties associated with the appraisal process for the Phase Three Options Paper.

- *Issues rather than options.* The text on some of the topics did not always present concrete policy proposals, instead simply outlining broad policy approaches (eg in terms of structure, rather than specific content), or discussing issues and possible ways forward to be considered during consultation. It was considerably more difficult to appraise discursive sections of text than formal policy proposals.

- *Similar options.* In some cases there are only small differences between the options, eg for the provision of Gypsies and Travellers accommodation where the total number of pitches is the same for all options and there are only small differences between the local authority allocations. It is very difficult to distinguish differential effects arising from very similar options.
- *Lack of spatial specificity.* Many of the policies are likely to have localised impacts depending on where change arises (eg where Gypsies and Travellers sites are developed), but do not identify the locations where those changes would take place, instead leaving it for LDF processes to decide. In these cases it is often impossible to say what effects the policies will have because these will depend to a very large extent on the particular conditions in individual locations.
- *Lack of indication of scale.* For many policy areas, there is no indication given of the likely scale of interventions arising as a result of the policies. It is not possible to know in many instances how much activity is likely to arise and what the extent of effects is likely to be.
- *Lack of indication of timescales.* For all policy areas except Gypsies and Travellers and Minerals, no indication is given of the likely timeframes for interventions arising as a result of policies. In these cases it has therefore been impossible to be able to differentiate the effects between short-, medium- and long-term timeframes. It can only be assumed that interventions and their associated effects are likely to arise in a similar fashion and to a similar extent throughout the life of the Phase Three policies.
- *Synergistic and cumulative impacts.* As the West Midlands RSS is being revised in three phases, the Phase Three SA is covering five separate policy topics rather than a complete spatial strategy. Furthermore, at the options stage the appraisal does not have a single, definitive set of proposals to consider, but instead a range of potential options and issues to discuss. It is therefore argued that it is not possible to assess synergistic and cumulative impacts at this stage, and that this issue should be explored at later stages of the revision process, when a set of concrete proposals is put forward.

With those provisos explained, the following sections describe and appraise each of the five policy topics in turn.

6.4 CRITICAL RURAL SERVICES

Description of Options

The aim of the revision is to identify the role of service provision in enhancing the sustainability of rural communities, to assess whether particular services are critical to this process and whether the process itself, and to assess consequently whether the policies required to address it vary in different types of rural area. The Options Paper discusses a range of technical work on these issues, and draws a number of conclusions, for example that:

- defining critical rural services is notoriously difficult, and that rural service provision is not static;
- rural service provision is a vital component of a sustainable rural settlement, but that too much development in appropriate locations can also be unsustainable (eg in environmental terms);

- focusing service development in settlements with a range of services can contribute to the decline of smaller settlements, but distributing services more widely is often difficult to justify unless smaller settlements develop significantly;
- service deprivation can be felt as acutely in ‘accessible rural’ locations as in ‘remote rural’; and
- it is crucial to understand what local stakeholders, including the voluntary and community sector, want from services.

Following on from this discussion, three options are proposed in the Phase Three Options Paper:

- Option 1: Sustainable – Climate Change Driven. Aims to offer the opportunity to reduce the need to travel by focusing service provision in County and Market Towns, maximising use of ICT and mobile facilities for other rural areas, allowing growth of housing and commercial facilities to support service development, and improving rural areas and county/market towns.
- Option 2: Community-Based. Aims to promote a ‘bottom-up’ approach whereby local stakeholders would identify service needs, scale and locations, with locally-led reviews of service useful to justify the protection/enhancement of services. This work would be developed through Parish Plans, Community Strategies, LTPs and LDFs.
- Option 3: Status Quo. Assumes that RSS policies on Rural Renaissance are sufficient in their current form.

In order to carry out a Sustainability Appraisal of these options, it is necessary to have a reasonable idea of what outcomes are likely to arise as a result of their implementation, eg how the distribution and provision of services in the region’s rural areas would change. However, the options are defined in fairly vague terms (even with some supporting text on ‘Implications’), and it is difficult to know in precise terms how service provision and distribution might change under each option. Therefore we have attempted to clarify our view on what might arise as a result of the three options, as follows:

- Option 1: Sustainable – Climate Change Driven. In simple terms, this option would result in a more concentrated distribution of all services in the larger county and market towns, although it is not clear which towns would be the focus for service provision. This would help to ensure that rural communities would not have to travel into the larger towns and cities to access these services, but there would be fewer services in smaller towns. Existing services (eg community halls, local shops, post offices, pubs, petrol stations, banks/cashpoints, GPs surgeries, primary schools, public transport etc) would decline further and faster than otherwise may happen. Unless public transport, ICT and mobile facilities were improved, residents may need to travel further for these basic services and car travel may increase. There would also be a focus of development (ie housing, employment land etc) in county and market towns to support service provision, which will help to reduce the need to travel across rural areas in the longer term.
- Option 2: Community-Based. In simple terms, this option would result in a more dispersed distribution of services across the region’s rural communities. Smaller rural settlements would be able to carry out reviews to justify the protection of existing services and development of new services, which in particular could result in a more widespread provision of lower order services. There may also be pressure for more scattered housing development under this option, which would increase the need to travel in rural areas in the

longer term. However, alongside this, there may be less development of higher order services, housing and employment land in larger rural towns, compared to option 1. Rural residents may therefore need to travel more often to urban areas to access higher order services.

- **Option 3: Status Quo.** It is not clear what would arise under this option. Policy RR4 looks to promote the development of services both close to where people live, and concentrated in accessible towns, with centres that have complementary roles. This may mean a more dispersed pattern of service provision in some areas, and a more concentrated pattern in others.

Appraisal Findings

The policy options are likely to result in quite different patterns of service provision across the region's rural areas, and therefore have quite different environmental, social and economic impacts. However it is very difficult to be precise about what those impacts might be or where they might occur, as the options are defined in fairly general terms. Impacts will only be known when further detail is available on how each policy might be implemented. However, some general conclusions on issues where broad impacts can be identified are set out below.

- *Access to services.* While each option will result in different patterns of service provision (as well as different provision of health services, education services and other resources) and favour different rural communities, it is not possible to state that any of them are likely to be more easy or 'equitable'. Each of them will make access to services easier for some people, and more difficult for others. Option 1 will particularly favour residents in market towns, as well as probably improving access to higher order services for the rural community as a whole. Option 2 will particularly favour residents of smaller rural settlements, who may see access to lower order services improve significantly. Option 3 could result in different patterns of service provision in different parts of the region.
- *Travel and transport.* Option 2 is likely to lead to a more dispersed pattern of service provision, potentially accompanied by increased housing and employment land outside the county/market towns. While this may minimise or reduce the need to travel for some services (eg lower order services provided by local shops, primary schools, GPs etc), in the longer term a larger, more dispersed rural population is likely to travel more than if that growth was more concentrated. Option 1 may have the opposite effect, with dispersed communities needing to travel further to access everyday services, but with an increasing number of people accessing more services in county/market towns where there is also likely to be better public transport accessibility. It is not clear what transport patterns might arise from Option 3, as patterns of service provision may vary across the region.
- *Climate change mitigation.* While the policy is unlikely to have any impact on CO₂ emissions from households, commercial sources etc, emissions are likely to change as a result of transport patterns. Focusing service development (and housing and economic development) in county and market towns through Option 1 may in the long term result in lower CO₂ emissions (particularly from transport) than a more dispersed pattern of development under Option 2, although remaining residents in more remote communities may need to travel further than they do now. Option 2 is likely to have the opposite effect on transport-related emissions.
- *Environmental and historic assets.* It is not clear what impact the options might have on environmental assets, biodiversity, historic assets. The more concentrated development

pattern under Option 1 may cause more significant localised impacts, but may also ensure that wider damage to these assets is not caused. Option 2 may have the opposite effects. Precise impacts will be determined by the nature, scale and location of the changes that arise in implementing the options, and at this stage it is not possible to know what those changes might be.

- *Use of PDL.* Option 1 may promote the use of brownfield and PDL, which is more likely to be found in county and market towns.
- *Local sourcing.* Supporting the development of rural services should help to encourage local sourcing of food, goods and materials. Option 2 may have the most significant impact, as it may most effectively promote the survival and development of the local shops and markets that are often best placed to supply local products.

6.5 GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

6.5.1 Introduction

The revision of Policy CF9 will involve the development of policies for:

- Gypsies and Travellers; and
- Travelling Showpeople

Options for each policy issue are examined below.

6.5.2 Permanent and Transit Pitches for Gypsies and Travellers

Description of Options

Three options have been proposed in relation to the provision of 939 residential pitches for Gypsies and Travellers. Each option relates to the requirements for residential pitches for Gypsies and Travellers over the period 2007-2017:

- Option 1: Need Where it Arises basis, based on Gypsy and Traveller Accommodation Assessments, reflecting the current distribution of site provision, unauthorised sites etc.
- Option 2: Planning Criteria basis, based on a review of environmental constraints and opportunities in each District. Constraints include Greenbelt, Built-up Areas, Flood Risk Zones 2 & 3, Areas of Outstanding Beauty, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SAC), Special Protection Areas (SPA), RAMSAR sites, Grade 1 agricultural land, National Nature Reserves, Ancient Woodland, and the Peak District National Park. Opportunities include population at 2016, Links to Road Transport Network, and Growth Points/Areas of Regeneration.
- Option 3: Re-distribution of existing provision, whereby there is no district where Gypsies and Travellers cannot live on authorised sites, and a minimum of 14 pitches allocated to all districts.

A draft policy has also been issued for transient pitches, which requires that local authorities deliver the transit sites listed below, with decisions on location and type of site determined through LDF processes.

	Permanent Pitches			Transit pitches
	Option 1 – Need Where it Arises	Option 2 – Planning Criteria	Option 3 – Re-distribution of existing provision	
Cannock Chase	35	28	32	5
East Staffordshire	15	23	14	5
Lichfield	11	12	14	5
Newcastle-under-Lyme	20	20	19	5
South Staffordshire	50	44	46	5
Stafford	37	42	34	2
Staffordshire Moorlands	2	7	14	2
Stoke-on-Trent	40	36	37	10
Tamworth	7	6	14	5
<i>Staffordshire and Stoke</i>	217	218	224	44
North Warwickshire	18	16	17	5
Nuneaton & Bedworth	29	27	27	5
Rugby	66	55	61	5
Stratford-on-Avon	45	43	41	10
Warwick	13	15	14	15
<i>Warwickshire</i>	171	156	160	40
Bromsgrove	3	4	14	0
Malvern Hills	33	34	30	10
Redditch	0	4	14	18
Worcester	22	19	20	20
Wychavon	66	70	61	20
Wyre Forest	44	35	41	0
<i>Worcestershire</i>	168	166	180	68
Birmingham	19	16	18	15
Coventry	3	5	14	5
Dudley	21	17	19	3
Sandwell	3	3	14	3
Solihull	26	23	24	5
Walsall	39	31	36	3
Wolverhampton	36	27	33	3
<i>Metropolitan districts</i>	147	122	158	37
Herefordshire	109	109	100	10
Shropshire	93	122	86	35
Telford & Wrekin	34	46	31	10
<i>Herefordshire/Shropshire</i>	236	277	217	55
West Midlands Region	939	939	939	244

Appraisal Findings

It is difficult to identify clearly different effects arising from each of the three options. Firstly, all of the options will result in 939 extra pitches being provided across the region, which means that all three of the options would meet the region's total requirements as defined by the Gypsy and Traveller Accommodation Assessments. Secondly, the differences between the allocations are not significant:

- at sub-regional level the biggest difference between options *in numerical and percentage terms* is in Herefordshire/Shropshire between Option 2 (277 pitches) and Option 3 (217 pitches), with Option 3 being 28% less than Option 2;
- at local authority level the biggest difference between options *in numerical terms* is in Shropshire between Option 2 (122 pitches) and Option 3 (86 pitches);
- *in percentage terms* is in Redditch between Option 1 (no pitches) and Option 3 (14 pitches); and
- most of options at local authority level only vary by less than 10 pitches.

Thirdly, the options are not spatially-specific beyond allocating total pitch requirements at local authority level. There is no indication as to where the additional pitches might be located, with this issue to be decided through LDF processes. It is also likely that many of the additional allocations will be on small sites, with no regionally-significant impacts arising.

However, despite the difficulties in appraising the relative effects and implications of the three options, the following conclusions can be drawn:

- *Travel and transport.* Option 2 has been informed by a consideration of links to the road network, but does not focus provision in the MUAs and has not been developed in order to promote use of public transport etc. Therefore it may be possible to suggest that it is less likely to support the development of sustainable transport patterns than the other options.
- *Flood risk.* Option 2 has been determined partly in light of information on Flood Risk Zones 2 & 3. This is likely to make it a better option than Options 1 or 3, although it is not clear that this would ensure that development would not increase risks from flooding. None of the options are not sufficiently spatially specific for it to be possible to relate proposals to flood risks.
- *Environmental assets.* Option 2 has been determined partly in light of a review of environmental constraints, understood to include Greenbelt, Areas of Outstanding Beauty, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SAC), Special Protection Areas (SPA), RAMSAR sites, National Nature Reserves, Ancient Woodland, and the Peak District National Park. This is likely to make it a better option than Options 1 or 3, although it is not clear that this would ensure that development would not have impacts on local environmental assets. None of the options are not sufficiently spatially specific for it to be possible to relate proposals to specific assets.
- *Biodiversity.* For the same reasons as outlined in the previous bullet, Option 2 is likely to be a better option than Options 1 or 3, although it is not clear that this would ensure that development would not have impacts on local biodiversity assets. None of the options are not sufficiently spatially specific for it to be possible to relate proposals to specific assets. In terms of Natura 2000 sites, the HRA Screening Report has concluded that significant effects are unlikely to arise for those sites, but that sensitive locations should be avoided in the preferred policy option.
- *Poverty, health, housing, access to services, sustainable communities.* The provision of 939 extra pitches will be vital to ensuring that the Gypsy and Traveller community has access to decent housing, services and opportunities, and that issues around poverty and deprivation, health inequalities and poor health are addressed. As such, all of the options are likely to support the development of stable and sustainable communities. However, it is not clear that any of the options will address the issue more effectively than the others.

6.5.3 Plots for Travelling Showpeople

Description of Options

Two options have been proposed in relation to the provision of 118 plots for Travelling Showpeople over the period 2007-2012:

- Option 1: based on the Gypsy and Traveller Accommodation Assessments, with over half the plots in the West Midlands conurbation.
- Option 2: a wider spread of opportunities for site development.

	Option 1	Option 2
Shropshire/Herefordshire/Telford & Wrekin	9 plots	19 plots
Staffordshire & Stoke	23 plots	23 plots
Warwickshire	1 plot	23 plots
Worcestershire	22 plots	22 plots
West Midlands Conurbation	63 plots	42 plots
Region	118 plots	118 plots

Appraisal Findings

It is very difficult to appraise the two policy options. Firstly, both options will provide the same total number of plots – 118 – and would meet the total requirement identified in the Gypsy and Traveller Accommodation Assessments. Secondly, the differences between the allocations at sub-regional level are not significant, given the numbers of plots to be allocated. Thirdly, the options are not spatially-specific beyond allocating total plot requirements at sub-regional level. There is no indication as to where the additional pitches might be located, with this issue to be decided through LDF processes. It is also likely that many of the additional plots will be on small sites, with no regionally-significant impacts arising.

As a result, although the two options were appraised using the SA Framework, there is very little that can be distinguished between them:

- *Climate change mitigation, transport.* It does not seem that the options would have different impacts in terms of emissions of greenhouse gases from domestic or commercial activities, but different options could have different impacts in terms of emissions from associated transport patterns. Option 1 focuses more of the additional plots in the West Midlands conurbation, which may suggest that this could help to promote more sustainable transport patterns. However, these impacts are likely to be very small, and it is impossible to draw any conclusions in terms of what transport patterns might arise while the options are not spatially-specific.
- *Flood risk.* Option 1 may focus more of the additional plots in local authorities with 'high relative inherent flood risk' – Birmingham, Sandwell, Tamworth, and East Staffordshire – as defined by the West Midlands Regional Flood Risk Appraisal (October 2007). However, neither of the options are sufficiently spatially specific for it to be possible to relate the proposals to flood risks.
- *Poverty, health, housing, access to services, sustainable communities.* Both options will provide an extra 112 plots, which will be vital to ensuring that the Travelling Showpeople

community has access to decent housing, services and opportunities, and that issues around poverty and deprivation, health inequalities and poor health are addressed. As such, both of the options are likely to support the development of stable and sustainable communities. However, it is not clear that either of the options will address the issue more effectively than the others.

6.6 CULTURE, SPORT AND TOURISM

6.6.1 Introduction

Options are set out on two issues:

- On Part A of RSS Policy PA10, which sets out a portfolio of culture, sporting and tourism assets in the region.
- On Part B and C of RSS Policy PA10, which sets out the policy basis for addressing any strategic gaps in provision, and for encouraging/considering new proposals.

Options for each policy issue are examined below.

6.6.2 Options for Updating Part A of PA10A

Description of Options

There are two options put forward for Part A of the policy:

- Option 1: Remove the portfolio of strategic cultural assets listed in the policy.
- Option 2: Update the portfolio so that it provides information on the Region's most important cultural assets, including assets of international, national and international importance.

Appraisal Findings

The objective of PA10 Part A is to ensure that Development Plans 'encourage the improvement of existing provision as well as the creation of new facilities' and 'support the further development and success of key Regional tourism and cultural assets'. In addition, the Options Paper suggests that the policy could be amended so that sites are 'protected' from development. It is therefore unclear as to what outcome might arise from the inclusion of a portfolio of assets – it could either result in those assets being improved/developed, or it could result in those assets being protected. While this is unclear, it is very difficult to identify the implications of any policy options with any certainty.

In addition, the Options Paper does not present the portfolio of assets, and therefore it is not possible to assess the site-specific impacts that could arise from the promotion or protection of assets under Option 2.

For the purposes of this options appraisal, it is assumed (in line with the supporting text from the Options Report) that including a portfolio of assets might 'encourage improvement of the identified assets', 'support the growth and diversification of the economy' and 'provide a guide

for future investment by a wide range of partners', although it is recognised that if the policy was to focus on protecting the portfolio of assets then some of these outcomes may not arise. In addition, it is assumed that the policy will be successful in creating 'world class' visitor destinations, and will attract an increasing number of visitors from overseas and elsewhere in the UK to the region. As such, some general conclusions can be drawn:

- *Access to cultural, sporting and recreational opportunities.* Both options aim to, and probably will, support the development of the region's cultural assets. However, it is assumed that Option 2, by including a portfolio of assets, would more effectively 'encourage improvement of the identified assets'. As such, it seems likely to have a greater positive impact on the provision of, and access to, opportunities to participate in culture, sport and recreation.
- *Transport and climate change.* It is not possible to know what impacts will arise as a result of improving the region's cultural assets, of making the region more attractive to visitors and residents, and of creating a 'world class' visitor destination. One outcome could be that the region's assets are visited by increasing numbers of people from overseas, and be accompanied by an increase in the amount of travelling within and outside the region. Another outcome could see the region's assets being visited by increasing numbers of West Midlands residents who otherwise might travel outside the region (or overseas) to access comparable 'world class' assets, with the region's residents able to access more assets locally, resulting in a decrease in the amount of travelling within and outside the region. However, on balance it is thought that the policy is likely to lead to an overall increase in travelling, unless the policy specifically focuses on (a) regionally-important cultural assets and (b) promoting sustainable access to the region's assets. If Option 2 proves to be more successful at promoting the improvement/development of the region's main cultural assets, it would probably result in greater transport impacts than Option 1. A knock-on effect of the extra travel that is expected to result from the policy is that the greenhouse gas emissions associated with the region's cultural and tourism sector will also rise.
- *Health.* Access to sporting and recreational opportunities should have positive impacts on health.
- *Economic impacts.* It is also assumed that Option 2 will more effectively 'support the growth and diversification of the economy' and 'provide a guide for future investment by a wide range of partners', supporting the development of the region's cultural sector.
- *Impacts on water resources, flood risk, environmental assets, pollution, and biodiversity.* Assuming that either option would be successful at promoting the improvement/development of the region's main cultural assets, there may be some additional pressures on environmental assets and resources, increased flood risk, increased pollution etc. If Option 2 is to be more successful than Option 1 at promoting the development of the sector, it is likely that those pressures will also be greater under Option 2. While most of those additional pressures are likely to be very small in regional terms, they may be locally significant. It is not possible to identify where those pressures might arise, as there is no list of assets to be included in the portfolio. However, The HRA Screening Report suggests that 'Several European sites could be affected by promotion of tourism through policy PA 10', and that there 'Possible sites [that could be affected] include Cannock Extension Canal SAC, Cannock Chase SAC, Peak District Dales SAC, River Clun, River Wye SAC, Wye Valley Woodlands, South Pennine Moors, River Dee and Bala Lake'. It is strongly recommended that the policy include provisions to ensure that any

improvement/development of the region's cultural assets be done in such a way that such pressures do not increase.

6.6.3 Options for Updating Part B and C of PA10A

Description of Options

The revision also looks at whether PA10 should address strategic gaps in the provision of cultural sport and tourism assets, and three options are put forward for Part B and C of the policy:

- Option 1: Retain the existing Policy PA10 Part B and C, which encourages the development of large-scale assets in suitable locations where they contribute to regeneration, and the identification of areas where sustainable tourism can be developed.
- Option 2: Amend Policy PA10 Part B and C, so that social outcomes were included to balance/enhance the policy, eg reference to sustainable transport and climate change.
- Option 3: Develop a new policy, so that broader and more detailed criteria could be developed, eg to recognise social agendas, to provide specific locational/distributional criteria.

Appraisal Findings

Although Option 1 (the existing policy) is precisely worded, the other two options do not set out specific proposals but rather outline general approaches to how the policy might be refocused (eg with more reflection of social issues alongside the primarily economic focus of Option 1) and restructured (eg with more detail). This makes them very difficult to appraise, but some general comments can be made.

Impacts/pressures/opportunities could arise from the improvement/development of the region's cultural assets on the following issues:

- Transport
- Water resources
- Greenhouse gas emissions
- Climate change adaptation
- Flood risk
- Environmental and historic assets
- Biodiversity
- The built environment
- Access to services, facilities and opportunities
- Deprivation and disadvantage
- Health

To ensure that these issues are addressed in full, it is recommended that they be included as criteria within Policy PA10 Part B and C, alongside the existing criteria which focus on issues such

as the need to develop large-scale innovative projects which contribute to the region's overall 'offer'.

6.7 QUALITY OF THE ENVIRONMENT

6.7.1 Introduction

Phase Three seeks to update and align the existing Quality of the Environment policies so as to ensure consistency with current national guidance and regional plans, strategies and initiatives, including making appropriate links with other Phase Three Revision topics, such as Culture, Sport and Tourism.

Options for each policy are examined below.

6.7.2 Policy QE1: Conserving and Enhancing the Environment

See Section 6.7.13.

6.7.3 Policy QE2: Restoring degraded areas and managing and creating high quality new environments

Description of Options

It is suggested that a revised policy and text for Policy QE2 could:

- (a) Recognise the key role that brownfield land can play in the transformation/regeneration of the region, especially its major urban areas
- (b) Ensure that the wider social and environmental benefits of brownfield land are recognised and nurtured, such as brownfield land habitats, and the multiple benefits of green infrastructure, including flood risk management, biodiversity and the promotion of good health
- (c) Recognise the benefits of the reuse and repair of existing buildings, particularly those of historic interest, and the potential for surviving archaeological interest
- (d) Recognise the role of West Midlands Brownfield Land working group in enabling brownfield land to be brought forward for development in line with housing and business policies
- (e) Encourage the preparation of Brownfield Land Action Plans/previously developed land strategies in areas with significant problem of brownfield land
- (f) Develop the regional Centre of Excellence for Land Reclamation as a source of information and expertise about brownfield land.

Three approaches have been considered:

- Option 1: Needs led: targeting communities in need when developing strategies and programmes of action to encourage the conservation and enhancement of brownfield land in ways that contribute to biodiversity and/or meet wider needs for greenspace or other environmental interests. Redevelopment would be targeted to other sites in sustainable locations.

- Option 2: Growth led: resources devoted to facilitating the redevelopment and re-use of brownfield land would be concentrated in those areas identified for significant growth, promoting the use of appropriate techniques to determine the most appropriate use of individual sites.
- Option 3: Competitiveness led: prioritise redevelopment and re-use of those brownfield sites that would enhance the image and attractiveness of the region, addressing for example areas of poor environmental quality in and around the major urban areas and regeneration zones.

Appraisal Findings

The policy can help to enhance environmental assets by developing brownfield land for green space or biodiversity value, particularly if this prioritises areas of poor environmental quality. It will aim to enhance landscapes and townscapes, promote health benefits and alleviate flood risk. However, it should be recognised that there may be value in restoring brownfield land for recreational and biodiversity value within areas destined for significant growth as well as in less sustainable locations, and that this should be delivered as an integral part of housing or employment developments to improve their quality and attractiveness. This should be promoted by the policy, which does not currently recognise the potential for providing green infrastructure within developments.

The policy can have benefits for the historic environment by promoting the reuse of historic buildings and recognising the potential for the existence of archaeological assets.

Promoting the development of brownfield land to provide green infrastructure can create opportunities for climate change adaptation, for example to provide soakaways or sustainable drainage, which should be promoted by the policy.

Promoting the use of brownfield land could help to encourage environmental technologies, through land reclamation and remediation, and support the environmental economy through the need for skills in land management and historic building renovation and maintenance. There may be indirect opportunities for promoting the recycling of construction and demolition waste and for supporting waste policies on on-site recycling and reuse, thereby promoting more sustainable waste management and encouraging greater resource efficiency. Recognising the potential for reuse of buildings also supports increased resource efficiency.

Option 1 would target areas of need and therefore help to increase access to green space and recreation in areas currently lacking, although this may increase the need to travel and increase emissions from transport by pushing development to the edge of towns or out of towns. The effects of options 2 and 3 on access to green space and recreation and transport patterns are unknown, as it is unclear whether the redevelopment of brownfield land would be promoted for building or for green infrastructure. Options 1 and 3 target communities in need and the major urban areas and regeneration zones for environmental enhancement, thereby promoting greater environmental justice. Option 2 is less likely to target these areas because of the focus on growth areas which are not necessarily deprived or disadvantaged. The benefits of a revised policy QE2 could be maximised if the options are not considered as alternatives but are each included as a multi-stranded approach to brownfield land reuse.

The likely effects of the proposals for implementing the policy are unclear, as it is not known how they might affect delivery of redevelopment on the ground. However, there is a

contradiction in the third alternative, whereby the environmental and biodiversity benefits of brownfield land improvement may be quickly lost if such sites are then promoted for development.

6.7.4 Policy QE3: Creating a high quality built environment for all

This policy has been superseded by policies SR2 and SR3 in the Phase 2 Revision Draft Preferred Option.

6.7.5 Policy QE4: Greenery, Urban Greenspace and Public Spaces

Description of Options

No options are proposed, but it is suggested that a revised policy and text for Policy QE4 should be re-titled “Green Infrastructure”, and could include:

- (a) Greater emphasis on green infrastructure, advocating an integrated, multi-functional and consistent approach across the region as defined by green infrastructure planning
- (b) Use of the West Midlands Green Infrastructure Prospectus definition as a foundation with supporting text including historic environment/character/local distinctiveness
- (c) Greater emphasis on the wider sustainability benefits that green infrastructure can deliver, especially in areas of deprivation, including improving the image and attractiveness of an area, potential contribution to renewable energy/biomass, recreation, health and wellbeing, mitigation and adaptation to climate change, minimising flood risk and conservation of biodiversity.
- (d) Reference to recreational resources including access and emphasising importance of PPG17 assessments
- (e) A requirement for local authorities to produce green infrastructure strategies, especially in growth areas and regeneration areas.
- (f) Identify priorities for green infrastructure provision, or alternatively promote inclusion of priorities in sub-regional and local green infrastructure strategies.

Appraisal Findings

The policy directly aims to protect and enhance the region’s environmental assets, including the historic environment, and appearance and local distinctiveness of areas. Opportunities will also be sought to maximise the benefits for biodiversity in the provision of green spaces. Promoting the provision of green infrastructure will help to capture opportunities for protecting and enhancing the quality of air, water and soil, and for attenuating noise and light pollution.

In seeking to improve the image of an area, the policy can help to support regeneration of areas and may help to support urban renaissance. The policy emphasises the link between deprivation and poor environmental quality by prioritising green space provision in deprived areas.

Enhancing accessibility and promoting recreation within urban green space will also help to deliver health benefits. Green infrastructure can help to promote cycling and walking, and this should be explicitly promoted.

The policy encourages incorporation of climate change adaptation measures, for example in prioritising areas prone to flooding and providing space for water. Capturing benefits for flood risk management is explicitly encouraged.

While ensuring sufficient provision is important in the growth areas, it is equally important within existing communities, and the policy should clearly require all local authorities to produce green infrastructure strategies. Small areas of green infrastructure can make an important contribution and should be required to be provided within new developments.

6.7.6 Policy QE5: Protection and Enhancement of the Historic Environment

Description of Options

No options are proposed, but it is suggested that a revised policy and text for Policy QE5 could:

- (a) Emphasise the historic environment as a finite and non-renewable resource
- (b) Underline the importance of the undesignated historic environment resource and of consulting local communities to determine what they value and why
- (c) Retain an emphasis on the consideration of historic landscapes and townscapes as a whole rather than individual sites in isolation
- (d) Review the lists of regionally distinctive aspects of the Region's historic environment and opportunities and priorities for enhancement and regeneration
- (e) Recognise the benefits of the historic environment to local distinctiveness and sense of place, to tourism, leisure, educational and cultural activities, to the economy and to sustainability
- (f) Reflect the principles of the Heritage White Paper, Heritage Protection Bill and Draft PPS for the Historic Environment
- (g) Retain an emphasis on managing change in a way that sustains heritage values and respects local character and distinctiveness
- (h) Provide guidance on the protection and enhancement of the historic environment in areas of the region likely to experience the greatest change, such as the Major Urban Areas and Settlements of Significant Development
- (i) Strengthen the requirement to use historic landscape characterisation and other characterisation tools and data to understand the historic character of places, their significance, and their capacity for change
- (j) Strengthen encouragement for the enhancement of the historic environment.

Appraisal Findings

The policy recognises and promotes the role of the historic environment within the overall sustainability agenda, and particularly is clearly focused on maintenance and enhancement of the historic environment assets, protecting the character of areas, improving local distinctiveness and sense of place. It also recognises its importance to leisure, culture and tourism, and the role of the historic environment in regeneration and the economy, although the links to economic regeneration and vitality should be more clearly explained and promoted,

for example in encouraging the environmental economy by supporting the demand for heritage skills.

In addition, the policy has a clear emphasis on consulting communities to identify values and priorities, enabling communities to influence decisions affecting them, encouraging participation and increasing community cohesion. Emphasis on the role of the historic environment in supporting regeneration will help to direct investment to deprived areas in need of regeneration, and this should be included as one of the factors in determining priorities for regeneration. Recognition of the link with Phase Two growth will help to ensure the historic environment is protected and enhanced in areas likely to experience high levels of growth from new development and where the historic environment could be under pressure or compromised.

The repair and reuse of historic buildings can help to improve resource efficiency by reducing consumption of new materials and generation of waste, and this emphasis should be retained from the existing policy.

6.7.7 Policy QE6: The conservation, enhancement and restoration of the Region's landscape

Description of Options

No options are proposed, but it is suggested that a revised policy and text for QE6 could:

- (a) Refer to the European Landscape Convention as the National and European context for managing the region's landscapes and encourage local authorities to prepare action plans for the implementation of the Convention
- (b) Emphasise the importance of managing all landscapes positively – explaining the shift to 'All Landscapes Matter'
- (c) Include the protected landscapes element of QE1
- (d) Refer to the pressures on the landscape in growth areas and the urban fringe, and identify Joint Character Areas subject to neglect/change (Currently 10 out of the region's 25 Joint Character Areas)
- (e) Retain the use of Landscape Character Assessment as a tool including Historic Landscape Characterisation and integrated assessments
- (f) Strengthen references to tranquillity, noise and light pollution
- (g) Include reference to geodiversity
- (h) Include reference to townscapes and maintaining and strengthening local distinctiveness
- (i) Identify priorities for landscape restoration and enhancement, based on those landscapes that are being neglected or changing in a way that is inconsistent with their character, as well as requiring local authorities to identify opportunities based on landscape character assessment.

Appraisal Findings

The policy directly aims to protect, enhance and manage the character and appearance of the region's landscapes and townscapes, helping to strengthen local distinctiveness and improve the quality of the local environment.

The policy requires the identification of priorities for restoration and enhancement, which may indirectly help to improve environmental quality in deprived/disadvantaged areas suffering damage and degradation. Particular focus is placed on areas under pressure including from growth and development arising from Phase Two. Opportunities should be captured for both ensuring the retention of landscape assets in these areas and for promoting appropriate design within developments. The highlighting within the policy of the important urban fringe landscape could have indirect benefits for promoting access and recreation.

Management of the region's landscapes may have indirect benefits for biodiversity by preserving and enhancing natural areas and open spaces. It can also have indirect benefits for maintaining or improving air, water and soil quality, and could make a contribution to adaptation to climate change, such as reducing flood risk, mitigating temperature rise and supporting biodiversity migration. These benefits could be more explicitly recognised in the policy, for example through reference to the contribution landscape preservation and enhancement can make for habitats and species movement.

6.7.8 Policy QE7: Protecting, managing and enhancing the Region's Biodiversity and Nature Conservation Resources

Description of Options

It is suggested that a revised Policy QE7 could:

- (a) Refer to the need to support resilient natural systems across the region, through for example promoting delivery at a landscape scale and linking fragmented habitats
- (b) Recognise the need to ensure that biodiversity assets can adapt to expected future climate change
- (c) Deliver an agreed set of regional habitat targets linked to the Regional Opportunities map
- (d) Require that local opportunity maps are developed as part of the Local Development Framework process
- (e) Emphasise the social and economic benefits of biodiversity across the region
- (f) Ensure that benefits for biodiversity are captured from the housing and other growth proposals for the region
- (g) Raise awareness of the statutory duty on local authorities to ensure beneficial management of Local Sites for biodiversity and geodiversity
- (h) Recognise the potential for biodiversity enhancement associated with mineral extraction
- (i) Incorporate Geodiversity

Two options are proposed:

- Option 1, Regional Habitat Targets. This option involves updating the targets for improving priority habitats, as set out in Annex B of the RSS.
- Option 2, Focus Enhancement on Specific Areas or Zones. Under this option the focus for enhancement would be mainly on specific geographical areas, either the existing Biodiversity Enhancement Areas (BEA) in the adopted RSS, or the areas shown in the Regional Opportunities map.

Appraisal Findings

The policy directly aims to encourage maintenance and enhancement of biodiversity and to protect geodiversity and particularly seeks to improve resilience, decrease fragmentation and promote climate change adaptation.

There are other benefits to the protection and enhancement of biodiversity, including the improvement of environmental quality, creation or retention of recreational, landscape and tourism assets, providing opportunities for physical activity, improving the image and attractiveness of local areas and managing flood risk. These benefits could be promoted by the policy or text.

The policy may help indirectly to maintain and improve access to green space and the quality of urban environments, particularly through the emphasis on capturing benefits for biodiversity from developments. Therefore as well as promoting delivery at a landscape scale, enhancements should be sought in individual developments. This should be required and strongly promoted in the detail of the policy.

Option 1 promotes the delivery of regional biodiversity targets, while option 2 focuses on developing new or enhancing existing assets. Sustainability objectives do not help to differentiate between the options, but any benefits accruing could be maximised with a combined approach, promoting both the delivery of targets on regional priority habitats and the use of mapping to identify areas for enhancement or opportunities. Insufficient information is available at this stage to determine the relative merits of opportunity mapping compared to the identification of areas for enhancement.

6.7.9 Policy QE8: Forestry and Woodlands

Description of Options

No options are proposed, but it is suggested that a revised policy and text for Policy QE8 could address the following key issues:

- (a) Continue enhanced woodland management and creation in the region, but develop the balance between them, including resource targeting
- (b) Woodlands in rural areas, where most of the woodland resource is, must be considered alongside urban woodlands, where most of the region's population reside, with complementary but different priorities for each
- (c) Change in targeting woodland creation to include areas influenced by Opportunities Mapping as well as existing priorities such as the National Forest and Community Forest
- (d) The need to focus on ancient woodland protection/ enhancement and active Programmes of restoration of Ancient Woodland Sites (PAWS), with priorities influenced by national guidance, Opportunities Mapping and Biodiversity Action Plan targets for woodland
- (e) The need to afford effective protection to veteran trees/wood pasture as well as woodland
- (f) The potential for forestry and woodland industries to contribute to and benefit from woodland management and creation and the rural economy

- (g) The increasing importance of woodland and forestry policies embracing climate change adaptation and mitigation, including for example flood mitigation/floodplain management and linking with wood fuel for heat and energy
- (h) A wide range of woody biomass is potentially available as fuel for renewable heat and energy production, although wood arising from woodland management operations could be prioritised
- (i) The importance of developing awareness and delivery of the range of social, health and well-being benefits from trees and woodlands.

Appraisal Findings

The policy on forestry and woodlands will protect and enhance some of the Region's natural assets, enhancing landscapes and amenity value in urban and rural areas and providing opportunities for recreation and tourism and helping to promote active lifestyles and opportunities for exercise, particularly near to urban areas. New woodland creation can help to improve biodiversity habitats and connectivity, improve air quality, protect water quality and attenuate noise and light pollution, particularly in urban areas, and these benefits should be referred to and promoted by ensuring sufficient encouragement for woodland creation in or near to urban areas, as well as maximising the potential for biodiversity gains in other areas. This may also make a contribution to promoting urban renaissance and improving environmental quality including in deprived areas. Tree planting or retention can also improve the quality of new developments and enhance access to green space and this should be recognised and promoted in the detail of the policy, particularly for areas poorly endowed or under development pressure. The policy explicitly recognises the benefits for climate change adaptation and mitigation.

The policy will support the development of renewable energy technologies by encouraging the use of wood as a fuel, helping in a small way to reduce dependence on fossil fuels. The policy will also indirectly help to promote timber products which can increase the use of renewable resources including for sustainable construction materials. Together these can help to promote the sourcing of local products and support the Region's forestry sector and rural and environmental economies.

6.7.10 Protection of Agricultural Land (no existing policy)

Description of Options

It is suggested that revised text for Agricultural Land in paragraphs 8.38 and 8.39 of the existing WMRSS could address the following issues:

- (a) The importance of the quality of agricultural land regionally
- (b) The wider sustainability benefits to which agricultural land can contribute, including adaptation to the impacts of climate change
- (c) The potential for diversification of agricultural land to contribute to flood risk management
- (d) The potential to encourage local sourcing of food and energy crops
- (e) The potential for encouraging the management of agricultural land for biodiversity
- (f) Any variations in the agricultural importance across the region.

Appraisal Findings

The text explicitly recognises the potential for agricultural land management to contribute to climate change adaptation including flood risk management, and its management for biodiversity benefit. The text could refer to some of the other sustainability benefits of agriculture, in particular its importance in underpinning the rural economy, contributions to tourism and leisure, providing access to open spaces and opportunities for active lifestyles and maintaining landscapes. The best agricultural land should be protected, particularly in areas of significant growth or where it constitutes valued landscape or open space.

Encouragement is given to sourcing of local foods and production of energy crops, thereby also contributing to renewable energy production and climate change mitigation and the development of new environmental technologies and support for the energy sector.

6.7.11 Policy QE9: The Water Environment

Description of Options

No options are proposed, but it is suggested that the text and policy for a revised Policy QE9 could include:

- (a) Embedding the requirements of the European Water Framework Directive, which applies to all surface and ground water bodies in the UK, and has significant implications for both spatial and development control planning
- (b) A requirement for all Local Planning Authorities to adhere to the actions and long term objectives of the Severn and Humber River Basin Management Plans, which include specific environmental objectives for each water body and how the objectives will be achieved
- (c) The implications of major growth in the region for water supply and treatment systems and the need for significant investment in new water infrastructure
- (d) The need to address the increasing problem of diffuse pollution (pollution arising from urban and rural land use activities that are dispersed across a river catchment or subcatchment area) in the region
- (e) The need for better ground and surface water management through sustainable drainage techniques to help mitigate diffuse pollution, reduce flood risk and contribute to biodiversity and amenity
- (f) A requirement for all Local Authorities to prepare Water Cycle Studies in accordance with the published guidance from the Environment Agency to identify necessary infrastructure to support growth
- (g) A requirement to direct all new development to areas that have adequate existing infrastructure or any additional infrastructure can be accommodated with limited costs and environmental mitigation impacts
- (h) A commitment to the achievement of biodiversity action plan targets and the benefits of green infrastructure, including provision of guidance on the protection, management and enhancement of the region's Strategic River Corridors
- (i) A requirement for local authorities to include water efficiency policies in local development frameworks for new and refurbished residential, institutional and commercial developments

Appraisal Findings

The policy directly aims to increase the sustainability of water use, addressing both supply and demand side issues including water efficiency measures and ensuring provision of infrastructure where necessary. Promoting water efficiency will help to reduce emissions of greenhouse gases from water treatment and supply and wastewater treatment, however investment in major new infrastructure will similarly increase emissions. The policy addresses climate change adaptation, by requiring sustainable drainage techniques to be adopted to reduce flood risk and promoting more strategic management of ground and surface water including through the use of Water Cycle Studies.

In terms of water quality, the policy recognises the importance of compliance with the Water Framework Directive and River Basin Management Plans to protect the quality of the water environment, which will also have benefits for biodiversity. It also recognises the need to address diffuse pollution, and to ensure the provision of adequate infrastructure for new development which will help to reduce the risk of pollution from wastewater discharges. Inclusion of a reference to Surface Water Management Plans (as required by Water Cycle Studies) will help to encourage provision for overland flooding to reduce the risk of water pollution during flood events.

The policy also aims to support the improvement of Strategic River Corridors (defined in RSS currently as Severn, Trent, Avon, Wye, Tame, Blythe, Teme, Lugg, Arrow), which is likely to have associated benefits for biodiversity, recreation, leisure and tourism and landscape protection and enhancement. This could be extended to cover the improvement of rivers, lakes and canals more generally for multiple benefits, for example enhancing the biodiversity network function of rivers and canals. The policy could also make reference to the management of the water environment for multi-functional benefits including flood risk management, biodiversity gain, access and improvement of local environmental quality.

6.7.12 Air Quality (no existing policy)

Description of Options

No options are proposed, but it is suggested that the text for Air Quality in paragraphs 8.45 and 8.46 of the existing WMRSS could be updated to reflect the following issues:

- (a) The wider benefits which good air quality can provide for human health, biodiversity
- (b) The links to accessibility, congestion and public transport provision
- (c) The findings from the Habitats Regulations Assessment for the RSS Revision Phases 2, which highlighted the impacts of Phase 2 Revision development proposals on the European nature conservation sites within and beyond the region
- (d) Any variations in air quality across the region

Appraisal Findings

The text recognises the link between air quality and accessibility, congestion and public transport provision, and is likely to promote action to reduce the need to travel and increase public transport provision in order to improve air quality. This will have benefits for biodiversity and human health, although the text will not directly require steps to be taken to address poor

air quality. The text could note the potential effects on air quality arising from Phase Two developments and require particular action to mitigate likely impacts from growth in areas of poor air quality. Text which notes variations in air quality across the region should include those areas which are failing air quality standards for the protection of ecosystems.

There may be a need for additional policy to improve air quality in order to protect European nature conservation sites, but this depends on the Panel recommendations arising from the Phase Two Examination in Public, which included consideration of air quality policy to protect European sites in response to HRA recommendations on Phase Two.

6.7.13 Integrated Approach to the Management of Environmental Resources (Revised Policy QE1)

Description of Options

Phase Three seeks to develop a strategy for the protection, conservation, enhancement and management of regional environmental assets and resources for their intrinsic value and wider social and economic benefits. This will replace policy QE1 in the existing RSS.

It is suggested that a revised Policy QE1 and text could:

- (a) Provide overarching guidance to set the context for more specific environmental policies
- (b) Link back to and compliment the Phase 2 Sustainable Region policies to provide a bridge between Phase 2 and green infrastructure etc
- (c) Establish key environmental principles such as the ecosystems approach, minimising environmental damage, positive enhancement and net environmental gain to reverse decline
- (d) Emphasise the social and economic benefits of a high quality environment including image, health and well-being, and environmental justice/minimising environmental inequality
- (e) Promote a landscape scale approach to environmental assets utilising characterisation techniques and green infrastructure
- (f) Guide the approach to the targeting of resources, eg protecting and enhancing best quality areas or areas of poor/ degraded environmental quality such as the major urban areas, Settlements of Significant Development, the urban fringe
- (g) Recognise the challenges and opportunities presented by environmental decline, the cumulative, synergistic and secondary impacts of loss and degradation, the growth agenda and the impacts of climate change, including flood risk
- (h) Develop the sub-regional approach commenced in Phase 1 and continued Phase 2
- (i) Highlight the importance of delivery mechanisms.

Three options are proposed for different approaches:

- Option 1: Environment led. Promote a landscape scale approach, the protection and enhancement of key assets and the improvement of poor quality environments across the region.
- Option 2: Development led. Target areas affected by significant growth, promoting the use of characterisation techniques, with priority given to the protection and enhancement of key assets and addressing areas of poor environmental quality in and around growth areas.

- Option 3: Spatial Strategy led. Enhance the image and attractiveness of the region, with priority given to the protection of key assets and addressing areas of poor environmental quality in and around the major urban areas and regeneration zones.

Appraisal Findings

The policy will directly aim to protect, restore and enhance environmental assets, including landscape and open spaces. This should include designated and non-designated environmental assets, biodiversity and geodiversity, although it is not clear to what extent the built and historic environments are also included. This could be clarified in the text. The policy will aim to minimise environmental damage and promote positive gain, which may help to promote a reduction in air, water, soil, light and noise pollution.

The policy emphasises the challenges and opportunities relating to climate change and from flood risk, although it is not clear what the policy will promote in response to the challenge of flood risk. It should also specifically encourage opportunities to incorporate adaptation to climate change, which is not currently referenced in the policy.

The policy does not address resource efficiency, but one of the key principles should be to minimise the need to consume resources.

The policy will recognise the particular problems in areas of degraded environmental quality, and the pressure placed on environmental quality by growth. It recognises the multiple benefits of environmental improvement, and could recognise some additional benefits not currently referenced including: supporting urban renaissance; maximising use of brownfield land; increasing access to green space; providing opportunities for recreation and leisure; engagement in active lifestyles; and helping to reduce crime. The policy should explicitly promote an integrated approach to the protection and enhancement of environmental assets to ensure provision of these multi-functional benefits, which is not currently done other than in the title of the policy. It should also give guidance on what an integrated approach means in practice, and how assets can be valued for their intrinsic value as well as economic and social benefits.

Each of the options seeks to protect assets and improve areas where environmental quality is poor, although each targets those areas differently. By targeting growth areas only, option 2 may result in a low priority being given to some key areas of poor quality, particularly within the MUAs. Options 1 and 3 would capture those areas, although they would give less emphasis to the need to protect and improve assets in growth areas likely to be under pressure in future. Option 1 would additionally capture some areas of poor environmental quality outside the MUAs and growth areas, for example areas of poor air and water quality. The benefits will be maximised if the options are not considered as alternative approaches but as different elements of regional priorities.

6.7.14 Flood Risk

Description of Options

It is suggested that a new policy and supporting text for flood risk could include:

- (a) Text emphasising the national framework with regard to flood risk management and development in flood risk areas.
- (b) A requirement for local authorities to have regard to the Catchment Flood Management Plans produced by the Environment Agency when preparing LDDs.
- (c) The need to decrease the reliance on engineered flood defences and focus on catchment wide flood risk management.
- (d) A requirement for local authorities to adopt a strategic and integrated approach to managing surface water.
- (e) Requirements for local authorities to produce and update Strategic Flood Risk Assessments incorporating fluvial, surface water and ground water issues, and Surface Water Management Plans.
- (f) A requirement for all infrastructure supporting new development to avoid areas at risk of flooding and to be capable of remaining operational during flood events by incorporating resistance and resilience measures if required.
- (g) A requirement for all new development to incorporate sustainable drainage systems unless it would be impractical to do so, linking back to and developing the Phase 2 Sustainable Region policies.
- (h) Encouragement for local authorities to promote the retrofitting of existing properties with sustainable drainage systems and flood resistance and resilience measures.
- (i) Encouragement of positive flood risk management by promoting land management practices which provide multifunctional benefits.
- (j) A requirement for local authorities to consider emergency planning and services in relation to flood risk at a strategic level, including the transfer of flood defence materials along infrastructure corridors.
- (k) Encouraging new development to seek opportunities to make space for water by providing guidance on layout and design issues, and highlighting the benefits for green infrastructure planning and biodiversity.
- (l) The need for local authorities to take account of the increasing flood risk associated with climate change by ensuring that new development does not increase, and wherever possible reduces the adverse consequences of all forms of flooding.

No options are proposed, although the text notes that two alternative approaches to the policy had been considered but subsequently rejected.

Appraisal Findings

The policy directly seeks to reduce flood risk and increase resilience to flooding, in part as a response to the impacts of climate change. It requires a strategic and integrated approach to managing surface water at local authority level, and explicitly promotes action at both the planning and design levels, improving the quality and safety of housing. Retrofitting of existing properties with sustainable drainage and flood resilience measures is encouraged. However, new developments are not required to incorporate flood resilience measures and this should be included.

The policy or text may help to prevent inappropriate development in flood risk areas through a restating of national policy and by requiring new infrastructure to avoid flood risk areas. It may

indirectly help to promote the adoption of new technologies and sustainable construction standards in relation to sustainable drainage systems and resilience/resistance measures.

Encouraging land management for multifunctional benefits could have benefits for biodiversity by improving habitats and protecting wildlife corridors. The importance of the use of sustainable drainage systems for protection of international nature conservation sites should be referenced, and should be required in all new development unless impractical. It may also help to encourage the protection and provision of open space within and around developments, so enhancing townscapes and possibly protecting and providing recreational space.

Through the various measures to reduce flood risk the policy will help to reduce the risk of surface water pollution from flood events. Although this is not explicitly promoted by the policy, reference could be made in supporting text to the significant pollution impacts arising from flood events.

The Phase Two Sustainability Appraisal recommended that the constraints to growth in Settlements of Significant Development should be addressed, including flood risk constraints. These constraints could be referenced in the policy.

6.7.15 Energy Efficiency in Existing Buildings

Description of Options

No explicit options are proposed to address energy efficiency in existing buildings, but it is proposed that policy EN2 could be revised to encourage improvements to the energy efficiency of existing buildings as opportunities arise.

Appraisal Findings

Encouraging energy efficiency improvements to existing buildings gives greater promotion to a range of sustainability benefits over and above that which would be achieved by only requiring improved energy efficiency in new build. It will promote greater and more widespread resource efficiency for the region, reducing greenhouse gas emissions and enabling more reduction of energy costs. This could make a contribution to reducing fuel poverty, improving housing standards and reducing health inequalities if appropriately targeted, and this could be encouraged by policy EN2. It would also give greater impetus to the development and use of energy efficient goods and services and to the adoption of sustainable building standards, indirectly giving support to the manufacturing and installation sectors.

6.7.16 Energy Targets

Description of Options

Three options are proposed for different approaches to adopting energy targets:

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

Appraisal Findings

All options will encourage the development of alternative sources of energy, and increase the proportion of renewable energy generated thereby reducing achieving greater the region's contribution to climate change by reducing the emission of fossil CO₂ from energy generation. Option 1 is likely to achieve a substantially greater increase in renewable energy generation than option 2. Using data from the Regional Energy Strategy 2004, it is estimated that option 2 is unlikely to achieve the equivalent of the national targets in either 2010 or 2020 (option 2 might achieve the equivalent of 60% of the national target for generation in 2010 and less than 50% of the target in 2020).

It is not known what level of increase would be provided under option 3 as further technical studies are required to quantify the targets. However, the more detailed and specific the targets, the more impetus there will be to take steps to achieve them. Therefore setting targets for sub-regions as in option 3 may make it more likely that an overall regional target is met, similarly if targets are set for specific technologies.

Increasing the level of renewable energy generation would reduce polluting atmospheric emissions from fossil fuel fired power stations, helping to reduce both air and water pollution. This will have benefits for biodiversity by improving the environmental quality of habitats. Option 1 is likely to achieve a greater reduction than option 2. All options are likely to increase combustion emissions from other sources, although this will probably be less than the emissions avoided. With higher levels of renewable energy generation, there is a greater risk that natural, built and historic assets could be adversely affected by development, particularly open spaces, landscapes and biodiversity. However, the effects are strongly dependent on location and on development control standards rather than renewable energy targets.

All options will give an added impetus to the renewable energy sector within and beyond the region and encourage greater take-up of new generation technologies. While option 1 may give a greater impetus overall, option 2 also gives support to sub-sectors concerned with transport fuel and heat which option 1 does not. It is not known how the support likely to be provided under option 3 compares with that under option 1, although the sectoral mix is likely to be similar. The options may also help to promote greater local sourcing of energy rather than import, and possibly promote community engagement if this is included as a feature of projects.

The targets under all options do not include targets for energy efficiency improvements, although the Regional Energy Strategy does. These could be considered for the energy section.

6.7.17 *Locational Criteria*

Description of Options

Two options are proposed for the approach to setting criteria for the location of renewable energy infrastructure:

- Option 1: criteria to be set within Local Development Documents
- Option 2: criteria to be set within RSS

Appraisal Findings

With higher levels of renewable energy generation, there is a greater risk that people and communities and natural, built and historic assets could be adversely affected by development, particularly through the impact on open spaces, landscapes and designated sites, and potentially also from increased noise levels. Renewable energy installations could have negative effects on biodiversity, including European protected sites, for example from land-take, disturbance and mortality related to development of energy infrastructure. On the other hand, people are likely to benefit from new jobs and industries, and potentially also from opportunities for community engagement and participation. However, it is not possible to differentiate between the sustainability effects of each of the options, as it is not known whether the application of local criteria might result in more or fewer developments being approved, or whether environmental standards would be tighter or looser than if criteria were set at regional level. It is therefore not possible to comment from a sustainability perspective on the relative merits of the two options proposed.

However, the following issues should also be considered as criteria in decisions on locating renewable energy infrastructure:

- Historic assets
- Geodiversity
- Air, water and soil quality

It is suggested to reword “impact of flora, fauna and animal life” to “impact on biodiversity”.

6.7.18 Green Belt

Description of Options

Phase Three seeks to consider the potential for a regionally specific policy for the green belts in the region. This would define their regional and sub regional roles and the specific uses that should be encouraged within it, in the context of national green belt policy.

Two approaches have been considered:

- Option 1: Apply PPG2 alone. This option reflects the current situation where PPG2 provides the policy for decisions in Greens Belts within the region. There would be no need for a further specific regional policy in RSS. The positive enhancement of this particular spatial area would be covered by the other policies in the revised Quality of the Environment chapter.
- Option 2: Develop a regional specific policy. This option develops regional green belt/urban fringe policy to reinforce green infrastructure/landscape and historic assessment of development proposals in Local Development Frameworks. The policy would identify where positive improvement should take place during the plan period and call on LPAs to work together across boundaries to develop Action Area Plans.

Appraisal Findings

Both options would continue to protect an important environmental asset from inappropriate development, maintaining the quality of the landscape near the urban fringe, an important function of green belt. This is also likely to have benefits for protecting species and habitats, maintaining access to the open countryside, promoting recreation and physical activity and supporting and maintaining the rural economy, all of which are also important functions of the green belt identified by national planning policy. Option 2 could increase the opportunities for these benefits by promoting improvements in green infrastructure and landscape. It could also capture additional benefits through promoting improvement of the historic environment.

Although neither option would clearly and directly promote unbalanced development, both may fail to allow opportunities for development in otherwise sustainable locations within the green belt, for example to provide balanced development which promotes more sustainable communities and which minimises transport distances and the energy consumption and emissions associated with travel, or to allow urban extensions which could provide critical mass for new infrastructure thereby potentially improving access to services and facilities.

The Phase Two SA identified particular issues for green belt loss around Coventry, Tamworth, Nuneaton and Bedworth and Redditch, and possibly also in Rugby, Warwick, Worcester, Wychavon, South Staffordshire, Cannock Chase and Solihull. Phase Three could develop policy to guide the approach to green belt in these particular areas to ensure the resource is safeguarded while benefits from significant levels of development are still captured.

6.8 MINERALS POLICY

6.8.1 Minerals Safeguarding

Description of Options

Phase Three seeks to safeguard mineral resources in the West Midlands as far as possible. The options proposed are:

- Option 1: safeguard only regionally important minerals and minerals infrastructure for the economic and development needs arising from Phase 2 revision (aggregates, brick clays, natural building and roofing stone).
- Option 2: safeguard all mineral resources and regionally important minerals infrastructure within the region.

The options paper also questions:

- Whether to designate a specific regional safeguarding area for Etruria Marl;
- Whether to apply different safeguarding approaches in urban and rural areas;
- What the threshold should be for consulting on non-mineral development in Mineral Consultation/Safeguarding Areas;
- What minerals infrastructure should be safeguarded;

- Whether to safeguard mineral resources in areas covered by national designations for landscape, wildlife conservation and cultural heritage;
- Whether there is a need for a regional safeguarding policy on coal;
- Whether there is a need to place more emphasis on realising the opportunities available from existing technologies to release energy sources from worked and unworked coal seams.

Appraisal Findings

The safeguarding of mineral resources and facilities will help to promote local or regional sourcing of materials, helping to avoid longer transport distances and greater transport costs, and reducing greenhouse gas emissions from minerals transport. Safeguarding of facilities for bulk transport of minerals will help to promote opportunities for rail and possibly water-borne freight which would also help to reduce transport emissions, and this should be clearly promoted by the policy. Safeguarding resources and facilities will also support jobs and businesses in minerals extraction, processing and transport, some of which will be important to the rural economy in areas where the industry is located. It will also support the provision of new homes, premises and infrastructure to support population growth and the regional economy.

However, safeguarding mineral sites and facilities may prevent development in some areas which would otherwise be sustainable locations for new development. Providing more flexibility in urban areas could allow more balanced development, minimising travel and accommodating more housing in areas where public transport provision is relatively good. However, it may undermine urban renaissance by allowing flexibility in urban areas outside the MUAs.

Safeguarding infrastructure relating to secondary and recycled aggregates will help to reduce the need for new primary extraction and indirectly support more sustainable, resource-efficiency construction standards. This should be clearly promoted by the policy.

By safeguarding minerals resources and infrastructure there may be indirect risks for environmental assets arising from minerals activities, including biodiversity, landscape and heritage assets, particularly if locations are safeguarded in or near designated areas. However, if sites are not safeguarded from other forms of development these potentially negative impacts may arise nevertheless from other developments. Therefore safeguarding either within or outside designated areas is unlikely to increase or decrease the risk of any threat to environmental assets.

Safeguarding coal areas will help to promote the regional coal mining industry and reduce the transport of coal from further afield. However, placing more emphasis on existing technologies to release energy sources from coal seams would promote greater use of fossil fuels and increase greenhouse gas emissions, reducing the proportion of energy generated by renewable and low-carbon sources, although it would indirectly give some additional support to the energy sector.

No particular sustainability issues have been identified which would help to differentiate between the two proposed options. In addition, no sustainability issues have been identified which are associated with the questions on Etruria Marl or on thresholds for consultation on non-mineral development.

6.8.2 *Future Supplies of Construction Aggregates*

Description of Options

Phase Three seeks to provide an adequate and steady supply of aggregates in the West Midlands in order to deliver growth and regional renaissance. The policy options being considered are:

- Option 1: Apportion final regional guidelines up to 2026 using existing sub-regions and existing apportionment methods.
- Option 2: Apportion final regional guidelines up to 2026 using different sub-regions and existing apportionment method.
- Option 3: Apportion final regional guidelines up to 2026 using different sub-regions and a methodology based on linking local supplies to future patterns of growth and infrastructure requirements and environmental capacity.

The options paper also questions:

- What additional policy is required to reduce the reliance on aggregates and increase the use of alternate materials in construction;
- What policies, provisions or concepts could be applied to determine future supplies of aggregates;
- Which sub-regions should be used to apportion regional requirements.

Appraisal Findings

It is not possible to make any useful or meaningful assessment of the options on sustainability grounds, without more detailed information about capacities, locations and environmental constraints. All options will help to ensure that material resources are available to support the provision of new homes, premises and infrastructure to support population growth. They also support the aggregates sector by providing a degree of certainty for future requirements, and will also indirectly support the rural economy as aggregates extraction often takes place in rural locations.

However, option 3 linking local supplies to future patterns of growth and infrastructure requirements and environmental capacity appears to give the greatest potential for minimising distances to markets and so reducing the impact of aggregates transport, while also minimising the potential damage to environmental assets which may result from extraction. Option 3 would also allow for greater consideration of other environmental constraints, for example flood risk, impacts on biodiversity and geodiversity, impacts on environmental assets such as open spaces, landscape and historic assets, and environmental quality issues such as air and water quality.

The existing RSS policy encouraging the use of secondary aggregates and alternative materials gives emphasis to reuse and recycling of minerals to reduce the need for primary extraction, helping to preserve the region's geological resources. This will promote more sustainable management of waste materials, increase the sustainability and resource efficiency of construction, and may indirectly help to give added impetus to the development of new

technologies to provide new sources of materials and help to reduce the pressure on environmental assets and land. The recycling of construction and demolition waste will promote more sustainable waste management. It is also likely to reduce material transport distances through local sourcing of materials, as the majority of the waste will arise in the urban areas where construction activity will also be greatest. Policy M3 also encourages the siting of recycling plant in appropriate locations, including on the fringes of the MUAs which will help to locate facilities near to the markets for use and so reduce transport distances.

No sustainability issues have been identified that can indicate additional specific policy on reducing the reliance on aggregates and increase the use of alternate materials, or on additional concepts to apply in determining future supplies. No analysis has been possible of the different approaches to identifying sub-regions, without more detailed information about capacities, locations and environmental constraints.

6.8.3 Future Brick Clay Provision

Description of Options

Phase Three seeks to ensure that appropriate provision is made in the region for the supply of and demand for brick clays. Three options are being considered:

- Apply a 25 year production supply requirement for existing/new brickworks across the region.
- Apply a 25 year production supply requirement for individual brickworks.
- Apply a 25 year production supply requirement to only MPA's with brick clay resources.

In addition, the options paper questions:

- What policies would best ensure that separate long term off site stockpiling of Etruria marl and fireclays can be provided;
- Could the 13 million tonnes shortfall in clay supplies be met from quarries within the region;
- What planning and environmental criteria should be used to identify broad locations for the development of long term off site stockpiles of clays.

Options Appraisal

It is not possible to differentiate between the identified options using sustainability objectives, as these only suggest alternative ways of applying the 25 year production requirement. It is not possible to assess the potential sustainability effects without more detailed information about capacities, requirements and locations. However, making the targets for supply as detailed and specific as possible may help to make it more likely that the requirements will be fulfilled. In this case, options 2 and 3 would provide the greatest likelihood that the industry is able to support the demand for new homes and to ensure the provision of other buildings to support regional economic activity.

Pressure on environmental quality and assets from minerals development must be taken into account, particularly the cumulative pressures in association with other forms of development

which may be greatest in Staffordshire. The options paper suggests that policy may be put in place facilitating clay extraction prior to other forms of development, which will help to ease these cumulative pressures on land and assets. This should be promoted where practicable.

Criteria for identifying broad locations of stockpiles include proximity to clay sources, brickworks and markets, which will promote minimisation of transport of clay and/or bricks and emissions associated with transport. The criteria also include good access to rail which may help to encourage its use as an alternative to road, also enabling a reduction in transport emissions. The criteria also include a general requirement to avoid or minimise significant environmental impacts.

The analysis has not identified any additional criteria which should be used to identify broad locations for the development of long-term stockpiles as many of the issues which could be relevant are only likely to be able to be determined at a site-specific level. However, criteria for specific locations should include impacts on the following:

- Traffic and transport, including minimising transport distances and promoting alternatives to road;
- Flood risk;
- Environmental assets such as green belt and other open spaces, landscapes and historic assets;
- Biodiversity;
- Geodiversity;
- Environmental quality and pollution, including impacts on air, water, soil, light and noise;
- Prioritising previously developed land over greenfield sites;
- Residential environments.

The analysis has not identified any sustainability issues which can be used to inform the questions on policies to ensure separate long term off site stockpiling of Etruria marl and fireclays and on whether the shortfall in clay supplies can be met from quarries within the region.

This chapter explains which elements of the SA process have now been completed, and how the remaining elements of the process will be carried out.

7.1 INTRODUCTION

As previously explained, the SA process can be seen as having five stages, as follows:

- Scoping (Tasks A1 to A5 of the ODPM process model)
- SA of Options Paper (Tasks B1 to B4), including:
 - Testing the RSS and revision objectives against the SA objectives
 - Appraising the options
- Consultation on the SA of the Options Paper
- SA of the Draft RSS Preferred Policies (Tasks B3 to B6 and C1)
- Consultation on the SA of the Draft RSS Preferred Policies (Tasks D1 to D3)

The first two stages listed above are now complete. This *Options Appraisal Report* is the key output resulting from the SA of the Options Paper, and provides the basis for consultation on the Options Paper.

7.2 CONSULTATION ON THE SA OF THE OPTIONS PAPER

Consultation on this *Options Appraisal Report*, and on the Options Paper itself, begins on Monday 29th June 2009 and closes on Friday 14th August 2009. This report has been made available through the WMRA website.

7.3 SA OF THE DRAFT RSS PREFERRED POLICIES

The development of the preferred policies, which will become the draft Phase Three Revision Document, will begin following the end of the consultation phase. Consultation responses will inform the development of the preferred policies.

As the preferred policies are developed, they will again be subject to an iterative appraisal process, whereby proposals can be amended so that negative impacts are reduced or mitigated, opportunities are taken advantage of, and the SA/RSDF objectives are promoted more effectively.

A final draft Phase Three Revision Document, setting out the final preferred policies, will eventually be subject to a formal Sustainability Appraisal, which will result in the production of a *Sustainability Appraisal Report*. This report is likely to contain information on the following issues:

- Sustainability Appraisal methodology;

- Summary of key points from scoping stage;
- Summary of key findings from options appraisal stage;
- Assessment and evaluation of the effects of Preferred Option and Policies;
- Mitigation measures;
- Monitoring measures;
- Explanation of how the Sustainability Appraisal has influenced the Phase Three Revision process;
- Explanation of how the Sustainability Appraisal has met the requirements of the SEA Directive;
- Non-technical summary of the above.

7.4 CONSULTATION ON THE SA OF THE DRAFT RSS PREFERRED POLICIES

Consultation on the draft Phase Three Revision Document (containing the preferred policies) will run in 2010, and the *Sustainability Appraisal Report* will also be subject to consultation at the same time.