

11.0 Sustainability

- 11.1 To ensure that the options for additional housing growth in the West Midlands promote sustainable development, a Sustainability Appraisal ('SA') will be carried out to integrate relevant social, environmental and economic considerations into the process.

SA of the Phase Two Revision to Date

- 11.2 A review of the SA into the effects and implications of the three Phase Two Draft Spatial Options (December 2006) and the Phase Two Preferred Option (October 2007) was carried out. The methodology used to carry out the SA is based on the 29 regional sustainable development objectives set out in the Regional Sustainable Development Framework ('RSDF') (January 2005) and several 'region specific' issues which were then turned into 29 core appraisal questions under four broad headings: Sustainable consumption and production; Climate change and energy; natural resource protection and environmental enhancement; and sustainable communities.
- 11.3 The 2006 SA did not identify any of the three options as being preferred over others with all giving rise to both positive and negative effects in sustainability terms. Mitigation was not proposed as part of the report – rather a series of questions and issues for discussion and consultation in formulating the Preferred Option.
- 11.4 The 2007 SA identified that the likely effect of the Preferred Option against many of the indicators was positive. However an overall negative effect was identified in respect of issues including the efficient use of natural resources; increased use of public transport, cycling and walking, focusing development in major urban areas; minimising the region's contribution to the causes of climate change; valuing, protecting and enhancing the region's environmental assets; providing decent and affordable housing for all; and encouraging development that creates a better balance of jobs, housing, social and cultural services and amenities. The document identified a range of nine general recommendations and a further 23 policy specific recommendations as a result of the appraisal. Following consideration of the recommendations, the Regional Assembly either accepted the recommendation and amended relevant policy/text, or agreed with the principle of the recommendation but made no change at this stage, or rejected the recommendation.

Scope of 2008 SA of Housing Options

- 11.5 *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (November 2005) states that it is the responsibility of the Regional Planning Body to ensure that an SA has been carried out in respect of an RSS revision. However paragraph 2.5.4 provides information on respondents "providing a representation at the Examination in Public (for example those providing alternatives to the RSS revision)" and states respondents:-

"...may therefore need to provide supporting SA information and appraisal work. Where this applies a full SA report is not needed. Appraisal activity at this stage should seek to justify the proposal put forward and it may be helpful to base such appraisal work on the scope of the draft RSS revision. The use of the same sustainability objectives and baseline information for example will make it easier to compare options and it will result in less work needing to be done by the proponent or respondent."

- 11.6 On this basis, the approach to the appraisal of the housing options will be carried out using the 2007 SA as its basis and will form, in essence, an Addendum to the 2007 document. Where possible and appropriate the existing methodology and baseline data will be re-utilised to enable ease of comparison of the various options for housing growth at the forthcoming Examination in Public.

Key Issues

- 11.7 The majority of the baseline analysis was carried out in 2004/5 in respect of the 2007 SA; albeit some updating took place in 2007. Much of the data, however, relates to time periods from between 2000 and 2005. To enable an accurate assessment of the likely effect of the housing options on sustainable development, a review of the baseline conditions has been carried out to identify any changes in key trends that need to be taken into account. In the same way, a review of key policy documents and strategies published since those identified in the 2007 has also been carried out.
- 11.8 The key issues and updates are briefly summarised below: -

Changes to Baseline Economic, Social and Environmental Conditions

- 11.9 Using the same indicators as the 2007 SA, key changes to baseline conditions have been identified in respect of the following (where no change then indicator is not identified below): -
- Regional Context – population growth of 2% by 2001;
 - Health – some improvements but some indicators (e.g. Long Term Limiting Illness) appear to show increasing incidence from the baseline position (worsening position);
 - Housing – housing completions broadly in line with WMRSS but not with the levels in the Preferred Option. Indications that average house prices peaked in October 2007 and have been declining more recently;
 - Crime – rate of decrease in crime has levelled across the region. Fear of crime has increased from the baseline position;
 - Balanced Development – indication that following a high point in 2003, the net loss of population from the MUAs to other urban/rural areas has started to slow;
 - Environmental Assets – now has highest number (with the North East) of Category A Buildings at Risk in the country. Character of east of region showing increased change to that identified in baseline position;
 - Biodiversity – significant decline in farmland bird species from baseline position and small decline in amount of ancient woodland;
 - Land Use – significant increase in the amount of brownfield housing development since 2001 (baseline position) and evidence that housing densities have continued to increase;
 - Pollution – biological and chemical water quality remains below the UK average but continues to improve and at a faster rate than the national average;
 - Climate Change – continued increase in CO2 emissions particularly from commerce and transport. Significant increase in the number of properties in the region at risk of flooding;
 - Energy – lack of accurate data but evidence that the West Midlands is the only region to have decreased its capacity for generating renewable energy from the baseline position and the generation of renewable electricity is increasing at a slower rate than other regions;
 - Efficiency – continued fall in consumption of primary aggregates but also in reserves of sand/gravel. Crushed rock reserves remain static. Information on water resources headroom indicates that there are emerging issues of insufficient water supply to meet demand and without mitigation across the region;
 - Planning/Transport – continued upward trend in traffic flows above the national average increase and downward trend in average traffic speeds particularly in the peak periods. Slight increase in the overall number of trips being made and a continuing decline in the numbers of trips made by public transport/on foot.
 - Waste – increase in amount of construction/demolition waste but recent drop in overall municipal waste generated. Significant increase in recycling/municipal recovery rates from baseline position. Region has the highest national municipal recovery rate in the country due to its high reliance on incineration;

- Responsibility - Levels of volunteering increased between 2001 and 2005. Data from 2007 indicates now levels are above the national average.

Changes in Baseline Planning Policy Framework

- 11.10 The 2007 SA assessed the relationship of the Phase 2 Preferred Option and the effect on policies of other policies, plans, programmes and sustainability objectives at a European, national and regional level. There have been a number of new or revised strategies published since the baseline policy framework was identified for the 2007 SA which have been identified.
- 11.11 The general conclusion of the above review is that where documents have been reviewed, revised or reissued, and whilst the overall strategy may remain consistent, there is a greater emphasis in sustainable development, climate change, housing development and flood risk issues than identified in the 2007 SA. There have been smaller shifts in emphasis in skills development, retail and economic development but these are not considered to be significant.
- 11.12 The review of changes in policy has not identified any further conflicts between those identified in the 2007 SA.

Methodology

- 11.13 As at June 2008, nine housing growth options have been identified for assessment providing between 40,000 and 90,000 additional dwellings above those currently identified. Final figures will depend on that identified by NHPAU.

- 11.14 The 2007 SA was based on the headings identified in the West Midlands Regional Spatial Development Framework ('RSDF') as identified below:-

1 Access	8 Balanced Development	15 Efficiency	22 Growth
2 Participation	9 Environmental Assets	16 Standards	23 Employment
3 Poverty	10 Biodiversity	17 Planning	24 Investment
4 Health	11 Land Use	18 Transport	25 Skills
5 Housing	12 Stewardship	19 Waste	26 Innovation
6 Crime	13 Pollution	20 Local sourcing	27 Technology
7 Culture/ recreation	14 Energy	21 Resource use	28 Responsibility

- 11.15 A January 2008 version of the RSDF has now been published which now identifies 33 objectives and provides a number of amendments and updates, new objectives and amalgamation of previously identified objectives. New topics that are introduced including ensuring landuse and development that takes into account predicted changes in climate including flood risk and also the promotion of environmental justice.
- 11.16 The 2007 SA broadly took account of the additional objectives that were (at that time) in draft. Following a further review, it is considered that no further changes need to be made to the indicators included in the 2007 SA and any changes in the baseline or policy situation identified above can be taken into account as part of the analysis. This will also assist in comparison of the effects arising from the Preferred Option with the options identified as part of the current housing study and no additional baseline analysis is required to take account of new objectives or topic headings.
- 11.17 To ensure consistency with the 2007 SA, the analysis will adopt the same key to present the findings of the appraisal of the housing options in respect of the effect/implications of each option on whether it will promote the achievement of each issue in the SA framework as follows: -

++	Strongly positive implications
+	Overall likely to be positive
∅	No effect, neutral, mixed
?	Unclear or not known
-	Overall likely to be negative
--	Strongly negative implications
O	Not relevant

11.18 Consistent with the SA, three additional columns will then be included in respect of the housing options being assessed to illustrate whether the effect is: -

- Direct or indirect (☐ for direct effects, ☐ for indirect effects)
- Permanent or temporary (☐ for permanent effects, ☐ for temporary effects)
- Significant ('H' for high significance, 'M' for medium, 'L' for low)

11.19 The format of the appraisal will be in the form of a schedule using the following template: -

RSDF	Appraisal Questions	Option							Direct/ Indirect	Permanen t/Tempora	Significan ce	Commentary
		1	2	3	4	5	6	7				
1....	Use.....											

11.20 The appraisal will identify significance of the effect of each option in meeting the RSDF objective identified. Where options give rise to significant effects that cannot be mitigated these will be defined.

Timetable & Actions

11.21 An initial review will commence in June 2008 with results feeding back into the Options refinement as part of an iterative process. Statutory consultees and other stakeholders will be involved where possible and appropriate with a particular focus on the regional seminars.