

2.0 Background

- 2.1 Sustainable development is at the heart of the planning system (e.g. see PPS1). The purpose of this Sustainability Appraisal is to ensure that the housing options in the West Midlands promote sustainable development taking into account relevant social, environmental and economic considerations.
- 2.2 This section identifies the background to the assessment including how the document relates to the legislative framework, sets out a summary of the SA (2007) which this appraisal has used as a starting point and finally sets out a brief summary of the key policy framework established by the Phase 2 Preferred Option which forms the basis against which the effects of the options is assessed.

Sustainability Appraisal Policy and Guidance

- 2.3 Under Section 39(2) of the Planning & Compulsory Purchase Act 2004, SA is mandatory for RSS revisions. Government guidance in “Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents”(“SA of RSSs and LDDs”)¹ and associated guidance incorporate in SA the requirements of European Directive 2001/42/EC on the “Assessment of the Effects of Certain Plans and Programmes on the Environment” (the ‘Strategic Environmental Assessment’ or SEA Directive)

- 2.4 (“SA of RSSs and LDDs”) states that: -

“A SA need not be done in any more detail, or using more resources, than is useful for its purpose. The SA should focus on the significant sustainability effects of the RSS revision, DPD or SPD, and consider alternatives that take into account the objectives and the geographical scope of the document” (paragraph 1.10)

- 2.5 Paragraphs 1.12 and 1.13 go on to state: -

“1.12 In a SA it is not appropriate, and is often impracticable, to predict the effects of an individual proposal in the degree of detail that would normally be required for an Environmental Impact Assessment of a project. If however, a RSS revision or a DPD proposed a specific infrastructure project, development or type of land use for a particular area or location (albeit a broad location in the case of a RSS revision) the SA Report should include information which can reasonably be provided on the likely significant effects of the proposal and alternatives to it....

1.13 Where proposals need to be assessed more than once, e.g. at different stages of preparation of a RSS revision, DPD or SPD, information from earlier appraisals can be used, subject to any updating or extra detail which may be necessary. This can help to avoid unnecessary duplication of appraisal”

- 2.6 Paragraph 2.5.4 of “SA of RSSs and LDDs” states that respondents “providing a representation at the Examination in Public (for example those providing alternatives to the RSS revision)”. It states that such respondents:-

“...may...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.”

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, OPDM, November 2005

- 2.7 At this stage of the process, GOWM is acting as a respondent and, on this basis, the approach to the appraisal of the housing options has been carried out using the SA (2007) as its basis. Where possible and appropriate the existing methodology and baseline data has been re-utilised to enable ease of comparison of the various options for housing growth at the forthcoming Examination in Public ('EIP'). Much of the logic used in reaching the original conclusions of the SA (2007) has been reapplied for the sake of consistency.
- 2.8 As set out in Volume 1, the options being assessed in no way cut across or pre-empts the existing statutory process for preparing and agreeing RSS or any Local Development Documents. The options are not formal policy or proposals of government and no decisions about the overall level and distribution of new housing for the West Midlands Region have been made. This document has been prepared to ensure that sufficient information is available to identify the extent to which the options that will accompany the Government's response to the Phase 2 Preferred Option promote the principles of sustainable development. In the event that, following consideration at the EIP, it is recommended that the need to provide for the additional housing growth in the West Midlands should be accommodated in the West Midlands RSS, then further assessment of the implications for sustainable development should be carried out in accordance with the legislative framework summarised above.

Phase 2 Preferred Option

- 2.9 The starting point for the options considered in this appraisal is the policies and proposals of the Phase 2 Preferred Option. Section A3 of the SA (2007) provides a summary of the evolution of the Phase 2 revision and its key objectives noting its focus on housing figures, employment land, centres, transport, waste and identification of the towns and cities where development should be focused.
- 2.10 The key issues relevant to this assessment, and the relevant policies being reviewed as part of the Phase 2 review, are also briefly summarised below:-
- Urban Renaissance (Policy UR1) and encompassing the following themes:-
 - Focusing development, housing and investment first in Major Urban Areas (MUAs) and then Settlements of Significant Development (SSDs) (Policies CF1, CF2, PA1)
 - Creating Sustainable Communities (Policies SR2, UR4)
 - Curbing Out-Migration from the MUAs (Policy UR 3)
 - Enhancing the role of City, Town and District Centres (Policy UR3)
 - Balancing Housing and Employment development and encouraging employment growth (Policies PA1, UR1)
 - Whether Green Belt Boundaries need to be reviewed to accommodate growth (Policies CF4, CF5)
 - Rural Renaissance including the regeneration of rural areas and enhancing links with MUAs and market towns (Policies RR1, RR3, RR2)
 - Need to provide 365,600 additional dwellings between 2006-2026 with a focus on Major Urban Areas and also to increase meet housing needs (Policies CF1, CF3, CF7)
 - Planning for the effects of Climate Change including reduction in emissions and promoting a sustainable pattern of development and renewable energy (Policies SR1 EN1, EN2)
 - Sustainable Transport – reducing the need to travel, improving sustainable transport options, particularly through a restructuring of land use and transport networks to create a sustainable and integrated pattern of development, enhancing accessibility and mobility to Major Urban Areas and improving air quality for sensitive locations (Policies UR1, SR2, SR4, T1, T2, T5)

- Restoring and conserving existing environmental assets (built and natural environments) biodiversity and provision of high quality urban green space (Policies QE1, QE2, QE4, QE5, QE7)
- 2.11 As the development of options for the delivery of additional housing primarily relates to the level and distribution of new housing development, the key policy in the Phase 2 Preferred Option is draft Policy CF3 which identifies that development plans should make provision for identified levels of additional dwellings (net) for the period 2006 to 2026. The implications of the options for additional growth in addition to that identified in Policy CF3 will be assessed in this appraisal.
- 2.12 Policy CF3 states:-
- “Development plans should make provision for additional dwellings (net) to be built as specified in Table 1 for the period 2006-2026. Proposals for Birmingham, Solihull (that part within the MUA) and the Black Country Boroughs are minima figures. Table one also shows the indicative annual development rates necessary to achieve these targets. In certain circumstances, the most sustainable form of housing development may be adjacent to the settlement but cross local authority boundaries. Where housing market areas cross local authority administrative boundaries, co-operation and joint working will be necessary to ensure that sites are released in a way that supports sustainable development. In the following locations, local authorities must jointly consider the most appropriate locations for development before producing or revising LDDs: (i) Birmingham and Bromsgrove in relation to Birmingham; (ii) Stoke-on-Trent and Newcastle-under-Lyme in relation to the North Staffordshire conurbation (iii) The four Black Country Boroughs in relation to Wolverhampton, Walsall, Sandwell and Dudley (iv) Stafford and South Staffordshire in relation to Stafford town (v) Cannock Chase, Lichfield and Stafford in relation to Rugeley (vi) Tamworth, Lichfield and North Warwickshire in relation to Tamworth and Lichfield Districts (vii) East Staffordshire and South Derbyshire in relation to Burton upon Trent (viii) Coventry, Nuneaton & Bedworth and Warwick in relation to Coventry (ix) Redditch, Bromsgrove and Stratford upon-Avon in relation to Redditch (x) Worcester, Malvern Hills and Wychavon in relation to Worcester.”*
- 2.13 Whilst no formal changes to Policy CF3 are proposed by the Government at this time, this SA sets out the implications of each of the housing options for this policy. This is explained further in Section 4.0.

Sustainability Appraisal of Phase 2 Revision

Background & Process

- 2.14 The SA of the effects and implications of the Phase 2 Preferred Option and policies was published on 23 October 2007. It also reflected the conclusions of the SA carried out in respect of the three Phase 2 Draft Spatial Options (December 2006) that formed part of the iterative process of identifying the Phase 2 Preferred Option.
- 2.15 The process is summarised in Table 2.1 below: -

STAGE	ACTIVITY	SA DOCUMENT	DATE
1	Sustainability Appraisal begins	SA scoping report	Nov 05
	Scoping Report issued		Feb 06
	Consultation on Scoping Report		27 Feb to 3 Apr 06
	Scoping Report reissued and finalised		Jun 06
2	Options appraisal stage begins	SA of Draft Spatial Options (October 2006) and refreshed SA of Draft Spatial Options (December 2006) in the light of updated Option 2 housing figures for the West Midlands Metropolitan Area	Aug 06
	Options appraisal report issued		Dec 06
3	Consultation on Options Appraisal Report (and Spatial Options Paper)		Jan to Apr 07
4	Appraisal of Preferred Option and policies		May to Oct 07
	Sustainability Appraisal Report issued		22 Oct 07

Table 2.1 Summary of SA (2007) work completed Source: Table A2.1 (Final Sustainability Report, 23 October 2007, Ursus)

- 2.16 Much of this section focuses on the key conclusions of the SA (2007) into the Phase 2 Preferred Option as this will form the basis for an analysis of the additional housing growth in the region. However, brief consideration of the key issues highlighted as part of the review of the SA into the three draft spatial options (2006) is also provided below as this identifies some of the key issues arising from elevated levels of growth above that in the Phase 2 Preferred Option and that were identified as part of that earlier process.
- 2.17 The methodology used to establish the framework for the SA (2007) was based on the 29 regional sustainable development indicators set out in the Regional Sustainable Development Framework (January 2005) ('RSDF') which were then turned into 29 core appraisal questions (see section 3.0 below). In addition, several subsidiary questions were developed under some of these 29 regional objectives to ensure that they are relevant to the RSS and focus on the key sustainability issues.
- 2.18 During the SA (2007) process a revised draft RSDF was published, which proposed changes to the objectives which would result in 33 objectives. The appraisal questions were reviewed to ensure that they reflected the revised draft objectives, which were adopted in January 2008.
- 2.19 All of the objectives of RSDF and the questions derived from it relate to the four priorities for immediate action in relation of sustainable development that were identified in '*Securing the Future*' (2005)²:-
- Sustainable Production & Consumption – 'achieving more with less'
 - Climate Change & Energy – changing the way energy is generated and used

² Securing the Future, The UK Government Sustainable Development Strategy, March 2005, TSO

- Natural Resource Protection and Environmental Enhancement – understanding environmental limits
- Sustainable Communities - creating places where people want to live and work, now and in the future

2.20 The SA into the Phase 2 Preferred Option is structured as follows: -

- Aims and objectives of the assessment;
- Aims and objectives of the RSS and the Phase 2 review;
- Explanation of how the scope of the SA was established including a review of the baseline sustainability conditions and plans, policies and strategies;
- Summarises the options and draft policies identified as part of the Phase 2 spatial options process;
- Sets out the findings of the appraisal against each of the RSDF objectives, an assessment of sub-regional, cumulative and synergistic effects and how the findings have been considered in finalising the Phase 2 Preferred Option;
- Review of outstanding issues and significant effects and identification of recommendations to mitigate negative effects and strengthen the Phase 2 Preferred Option;
- Recommendations for ongoing monitoring.

2.21 Appendices provide information on the following:-

- Chapter by chapter review of the SA findings;
- Detailed policy by policy appraisal;
- Detailed analysis of housing figures;
- Audit trail of recommendations from SA;
- Overall implications of the spatial options paper;
- Review of baseline conditions in the West Midlands;
- Review of conditions at International Nature Conservation Sites;
- Review of Policies, Plans, Programmes and Sustainability Objectives; and
- Review of Other Plans and Strategies with Potential for Cumulative Effects.

2.22 The SA was subject to consultation via a SA Steering Group, via reports issued to statutory consultees and to the general public and via events to stakeholders and the general public.

Key Issues

2.23 The SA (2007) states that there are a number of specific areas identified in the Phase 2 Preferred Option where substantial levels of new housing development will be focused (notably MUAs and SSDs) but that there are also other areas outside of these specific allocations where significant growth or new infrastructure is proposed. In addition, when the sensitivity of the environment to accommodate this change is taken into account, it can be concluded that the significant effects of the Phase 2 Preferred Option are likely to be spread very widely across the region and it has therefore been assumed that the whole region should be *“regarded as likely to be significantly affected by the Phase 2 proposals”*³.

2.24 Section A4.5 identifies those key sustainability issues which the RSS and SA needs to bear in mind and notably where⁴: -

³ Final Sustainability Report, 23 October 2007, Ursus Consulting Ltd, Section A5.5

⁴ Final Sustainability Report,

- The region is approaching or breaching agreed sustainability thresholds or constraints; and/or
- The region performs particularly badly in comparison to agreed targets, standards or comparators; and/or
- There appears to be a common consensus that the issue is a critical issue for the region (based on the review of strategies and data reports); and/or
- The RSS Revision process is likely to significantly affect how the issue or problem develops in the future.

2.25 The key issues identified in the SA (2007) can be briefly summarised as follows: -

1. **Economic Development** – the region’s economy has performed well but its position has remained static and it needs to reinvent itself to take advantage of available opportunities. There is also a need to narrow the gap between the best and worst performing parts of the region, ensuring skills match the demands of existing and future employers where they arise in the region and ensuring that infrastructure keeps pace with the needs of modern businesses and communities to attract necessary investment.
2. **Housing** – the region is facing a longer term failure in the housing market to provide many people with the housing that they want and housing affordability is a key problem facing the region. The SA notes that in 2003-4, only 14% of the housing constructed was affordable and this is unlikely to meet demand.
3. **Urban Renaissance** – there has been an unsustainable outward migration of the population (notably those who are the most economically active) from urban areas to (notably) urban areas outside the MUAs and a related increase in flow of commuting from these areas into the MUAs. There has been a rapid growth in house prices in areas in demand from commuters (pricing out people with lower paid jobs in these areas) whilst there has also been social and physical decline within less desirable urban neighbourhoods. Past efforts at regenerating urban areas have largely failed.
4. **Rural Renaissance** – Four fifths of the region is defined as a rural area and supports approximately a fifth of the population. There is great diversity within these areas and also distinct issues that need to be tackled in respect of the local economy, low population densities and deprivation. It is also crucially important that the quality of the environment is protected and enhanced.
5. **Sustainable Communities** – need to ensure that additional development does not have a detrimental effect on existing settlements and are “durable places where people want to live”.
6. **Transport** – comments that the Panel Report into the RPG (2002) identified transport as the single greatest challenge for the region. Major issues of congestion, high car usage and lack of access to public transport exist in the region and need to be addressed to ensure that accessibility is improved whilst environmental impacts are reduced.
7. **Water Resources** – the timing and location of new development must respect water resources and environmental constraints. A continued availability of reliable public water supply is essential; some of this will be provided via efficiency savings but new schemes will also be needed. Flood prevention and management is a high priority in some areas e.g. the Severn and Avon valleys.
8. **Climate Change** – this is recognised as one of the greatest threats facing the world and climate models indicate that the region will continue to get warmer with wetter winters and drier summers. A low carbon economy in the region is identified as having a number of benefits with the need to tackle the high car usage in the region as a key issue. The region also needs to take steps to adapt to predicted changes in climate (e.g. increased numbers of flood events).
9. **Flooding** – the region needs to develop and strategic approach to providing floodwater capacity along open areas in flood plains to tackle an increased incidence of flooding associated with climate change.

10. **Environmental & Historic Assets** – the level of development proposed in the Phase 2 Preferred Option is likely to have a significant impact on both natural and historic assets – depending on where and how the development is located.
11. **Biodiversity** – the region’s plants and animals have suffered major declines in recent decades and there are continuing pressures from development and climate change. It is a legal requirement to ensure that the RSS ensures that there are no significant adverse effects on internationally designated sites in the region.
12. **Land Use** – it is important to ensure the most effective use of land within the region to maximise its potential and particularly to maximise the use of brownfield sites, to safeguard Greenfield sites and to remediate contaminated land.
13. **Waste Management** – there are strong financial, legal and environmental reasons to reduce the amount of landfill and to reduce the amount of waste generated. Recycling rates in the region are currently low.

2.26 In assessing the effects on the above areas, the SA (2007) acknowledges that there are clear limitations and uncertainties including few agreed sustainability thresholds in the region and also uncertainties about the availability and reliability of data. The review of data, policy and baseline information was carried out in 2005. It is however considered that the above issues remain relevant in 2008.

Conclusions

2.27 The summary below considers, first, the key conclusions identified from a consideration of the effect of the three housing options on sustainable development and, second, how the Phase 2 Preferred Option affects sustainable development⁵.

Options Appraisal Stage (2006): Effect of the Three Options for Housing on Sustainable Development

2.28 The assessment of the three housing options in terms of their effect on the principles of sustainable development can be summarised set out in table 2.2 below: -

<i>Urban Renaissance</i>	None of the three options support the objective of ensuring that, by 2021, for every ten houses constructed in the MUAs, only seven should be constructed elsewhere in the region.
<i>Economic Development</i>	It is impossible to predict the precise impacts of the proposals on economic development but it seems likely the regional economy will be supported. The effect of casinos and airport expansion is, however, unclear.
<i>Land Use</i>	None of the three options can be delivered on land in isolation to land identified in the urban capacity studies and therefore the growth rates will put pressure on land already allocated for employment leading to housing and employment ‘competing’ for the best sites. All the options could be developed using large amounts of brownfield land and all would be above the PPG3 target of 60% by 2008 but options 2 and 3 would not meet the RSS target of 76% between 2001 and 2011. Also a number of local authority level targets would also be missed under all three options.
<i>Transport</i>	Very unclear impact on transport patterns that is impossible to predict accurately without carrying out modelling. Some broad conclusions can be identified including how the location of a greater proportion of housing outside of the MUAs gives rise to the danger that more of the region’s population would need to travel further to access employment and services

⁵ Three options comprises (1) ‘Business as Usual’ (average annual completion of 15,000) (2) ‘Managed Growth’ (average annual completion of 19,648) (3) ‘Meeting Projected Demand’ (average annual completion of 23,000). The Preferred Option identifies an average annual completion of 18,280. All figures to 2026. Full consideration is provided in Section 4.0 of Volume 1.

<i>Resource Use</i>	All three options would significantly increase demand for water and minerals. This includes some areas going into water deficit at different times under different scenarios. The effect of efficient resource use and use of renewables is unclear.
<i>Climate Change</i>	It is extremely likely that there will be an increase in energy demand in the region for all options. Without the use of renewables/energy efficiency measures, CO ₂ emissions will also rise. Some of the policies may partially mitigate increases e.g. park and ride policies but other aspects will have the opposite effect e.g. airport expansion.
<i>Biodiversity</i>	No assessment had been carried out at the time of publication of the RSS but in general terms the options would place increased pressure on biodiversity from increased land-take, pollution and disturbance
<i>Waste</i>	Waste will increase as a result of the options. There are no policies on waste minimisation and recycling to mitigate the effects.

Table 2.2 – Summary of key conclusions from Options Appraisal Stage (2006) into Phase 2 Preferred Option

Source: NLP

- 2.29 The appraisal 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 Phase 2 Preferred Option.

Phase 2 Preferred Option stage (2007) – Conclusions, Recommendations and their Incorporation into Preferred Option

- 2.30 The table 2.3 below provides a brief summary of the conclusions of the SA relating to Preferred Option Policy CF3 and the level of housing growth it identifies:-

Likely Effect against Sustainable Indicators		Regional Sustainable Development Framework ('RSDF') Objective considered in SA (2007)
++	Strongly positive implications	[none identified]
+	Overall likely to be positive	- Encourage land use and development that optimises the use of previously developed land and buildings
∅	No effect, neutral, mixed	- Minimise air, water, soil, light and noise pollution levels and create good quality air, water and soils (mixed)
?	Unclear or not known	- Increase use of public transport, cycling and walking to reduce road traffic congestion - Ensure development is primarily focused in the major urban areas - Land use and development that takes into account predicted changes in Region's climate including flood risk - Value, maintain, restore and recreate regional biodiversity - Ensure easy and equitable access to services, facilities and opportunities - Address poverty and disadvantage - Encourage physical development with a better balance of jobs, housing, social and cultural services and amenities - Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development
-	Overall likely to be negative	- Encourage waste minimisation, reuse, recycling and recovery - Achieve a strong and sustainable economy and prosperity - Provide decent and affordable housing for all
-?	Overall likely to be negative?	- Value, protect, enhance and restore the region's environmental assets
--	Strongly negative implications	- Efficient use of natural resources – water and minerals - Minimise the Region's contribution to the causes of climate change by reducing greenhouse gases from transport, domestic, commercial and industrial sources
○	Not relevant	- Promote high value and low impact technologies - Promote and ensure high standards of sustainable resource-efficient design, construction and maintenance of buildings - Encourage local sourcing of food, goods and materials - Reward efficient resource use and encourage alternative/renewable resource development - Encourage corporate social and environmental responsibility - Encourage and support a culture of enterprise and innovation - Reduce overall energy use through increased energy efficiency - Increase proportion of energy generated from renewable/low carbon energy - Implement a managed response to the unavoidable effects of climate change - Encourage high quality built environments that encourage biodiversity, and promote local distinctiveness and sense of place - Encourage local stewardship of local environments - Promote environmental justice recognising deprived areas and disadvantaged communities are likely to be affected by environmental damage - Enable communities to influence the decisions that affect their neighbourhoods and quality of life - Improve health and reduce health inequalities - Reduce crime, fear of crime and antisocial behaviour - Improve opportunities to participate in cultural, sport and recreational opportunities - Ensure the region's workforce is equipped with the skills to access high quality employment opportunities

Table 2.3 – Summary of key conclusions from SA (2007) into Phase 2 Preferred Option
Source: NLP

2.31 A range of nine general recommendations and a further 23 policy specific recommendations were identified as a result of the SA (2007) as summarised in the following schedule (table 2.4) summarising all of the recommendations. Those particularly relevant to housing growth are recommendations 1-5, 7-9, 11-14, 16, 24 and 31.

Recommendation/Mitigation		
1		Policy CF4 (phasing) should take a more radical approach to phasing by ensuring that a much greater proportion of housing is delivered in the MUAs for the first 10 years of the strategy
2		Policy CF3 (level/distribution of new housing) should establish housing figures for the non MUA districts as a maxima
3		Implementation Plan must ensure that infrastructure is delivered in Settlements of Significant Development
4		Policy CF7 (affordable housing delivery) should require the provision of social and intermediate housing units identified by the Cambridge Centre for Housing and Planning Research
5		Policy PA6A (employment land) should more closely allocate employment land to reflect levels of housing growth and unemployment
6		Policy SR1 (Climate Change) should establish a regional target on CO2 reductions
7		A policy should require that new housing development helps to fund the retro-fitting of existing housing stock with energy efficiency measures
8		Policy CF6 (making efficient use of land) should establish a region wide minimum density rate to all developments over 10 units and an overall density target for the region
9	SR2	Developments should be sufficiently large so that other community resources can be delivered alongside housing more effectively, as opposed to smaller infill developments
10	SR2	Local authorities should look to enhance/extend natural habitats and create new assets, to help protect biodiversity from the likely effects of climate change
11	CF7	Minimum % targets for intermediate and social housing at housing market area levels should be set
12	PA6A	Policy should also ensure the location of sites should promote sustainable transport behaviour, including that sites are or will be served by public transport
13	PA6A	Prioritise locations within urban areas which are or will be made accessible by public transport
14	PA6A	Promote employment land in mixed use development
15	PA6B	Clarify what is meant by attractive sites
16	PA6B	Employment land reviews should also consider the degree to which the employment land supports mixed use and balanced development objectives; whether the site provides employment land near or accessible to the potential workforce; whether the site provides employment accessible to deprived communities and supports investment in areas of deprivation; vulnerability to changes in flood risk.
17	PA7 & PA8	Sites proposed in development plans for Regional Investment Sites and Major Investment Sites should be required to take account of the potential effects of increased traffic on Air Quality Management Areas and to mitigate any potential impacts through plans for promoting alternatives to road freight and car use.
18	PA9	Include requirement to consider light pollution, air quality effects, highway

Recommendation/Mitigation		
		congestion and cumulative impact and employment need
19	PA13A	Clearer focus to employment need as a factor in allocating office space provision needed
20	PA13A	Include consideration of potential loss of accessible green space in assessing locations for development.
21	PA13C	Casino development should consider the potential impact on road congestion and pollution
22	T6	Park and ride schemes to be explicitly linked to a broader package of measures to manage demand
23	T11	Encourage exploration of the potential for use of rail freight from Coventry
24	T12	Greater emphasis on investment in public transport schemes in the list of priority investments
25	W1	Include requirement to minimise greenhouse gas emissions from waste management activities
26	W2	Increase diversion levels for Commercial & Industrial waste to meet national target for 2010
27	W2	Strengthen emphasis on importance of waste minimisation activities for both Municipal Waste and Commercial & Industrial waste
28	W2	Include commitment to support local/regional processing of recyclate and markets for recycled materials
29	W3	Sites in proximity to areas of congestion/low air quality should maximise use of alternatives to road transport wherever possible
30	W5	Clarify accessibility criteria to prioritise locations close to the source of waste over end users
31	W6	Sites in rural areas should be considered in terms of overall sustainability impacts and benefits
32	W11	Include requirement to promote restoration benefits for landscape, recreation and amenity and biodiversity.
33	W11	Include requirement for methane capture and energy generation from landfills

Table 2.4 – Summary of key mitigation and recommendations from SA (2007) into Phase 2 Preferred Option
Source: NLP

- 2.32 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.