

3.0 Sustainability Appraisal Methodology

Approach

- 3.1 This Sustainability Appraisal has been carried out in accordance with guidance and best practice including the Government's guidance "*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*" (November 2005) as reviewed in Section 2.0. It has been prepared to provide sufficient information to inform the Government's response to the Phase 2 Preferred Option on the extent to which the options for additional housing promote the principles of sustainable development.
- 3.2 The SA of the Housing Options does not form part of the SA of the Phase 2 Preferred Option (SA (2007)) but has utilised information contained within the SA (2007) and cross-refers to its methodology and recommendations. This will ensure that any issues identified can be compared and reviewed in the context of the process of reviewing the WMRSS.
- 3.3 The process for appraising the options has encompassed the following key tasks:-
1. Review of the SA (2007) to set the scope of the appraisal of the housing options and encompassing the following key tasks: -
 - Review and update of the baseline conditions identified in the SA (2007) and identification of any significant shifts in trends identified which need to be taken into account in respect of the options
 - Review and update of the baseline policy framework identified in the SA (2007) to identify any significant shifts in policy objectives which would need to form the background to the analysis of the housing options
 - Review and analysis of the methodology and Appraisal framework identified in the SA (2007) to identify whether there is a need to amend or update the framework in the light of the review of the housing options
 2. Initial review of emerging nine housing options identified by Options team to address and identify any key issues that could have an effect on sustainable objectives in the region
 3. Detailed review of emerging options against the sustainability framework (considered further below)
 4. Further process of iterative review and consultation with the Options team including a process of refinement of the assessment and housing options to provide three growth scenarios
 5. Finalising the SA for publication and submission with the Government's response to the Phase 2 Preferred Option
- 3.4 In respect of the framework for the SA (2007), it was based on the headings identified in the West Midlands Regional Spatial Development Framework ('RSDF') (as explained in the SA (2007) scoping report⁶). The headings were drawn out of the (then) 29 sustainable development objectives in the RSDF as identified below:-

⁶ Sustainability Appraisal of Draft Regional Spatial Strategy Phase 2 Revision for the West Midlands, Scoping Report, June 2006, Ursus Consulting Ltd

1	Access	9	Environmental Assets	17	Standards	25	Investment
2	Participation	10	Biodiversity	18	Planning	26	Skills
3	Poverty	11	Land Use	19	Transport	27	Innovation
4	Health	12	Stewardship	20	Waste	28	Technology
5	Housing	13	Pollution	21	Local Sourcing	29	Responsibility
6	Crime	14	Climate Change	22	Resource Use		
7	Culture/ recreation	15	Energy	23	Growth		
8	Balanced Development	16	Efficiency	24	Employment		

- 3.5 The January 2008 version of the RSDF identifies 33 objectives and a number of amendments and updates, new objectives and amalgamation of previously identified objectives. New topics that are introduced including ensuring land use and development that takes into account predicted changes in climate including flood risk and also the promotion of environmental justice (recognising that deprived areas/disadvantaged communities are more likely to be affected by environmental damage and degradation).
- 3.6 As outlined in Section 2.0 above, the SA (2007) took account of the additional objectives of the RSDF 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 SA (2007) and any changes in the baseline or policy situation identified in Section 3.0 can be taken into account as part of the analysis. This will also assist in comparison of the effects arising from the Phase 2 Preferred Option with the options identified as part of the current additional housing study and no additional baseline analysis is required to take account of new objectives or topic headings.
- 3.7 Section 5.0 briefly reviews the options that form the basis of the SA; all of which assume that the housing growth identified within the Phase 2 Preferred Option is brought forward in its entirety as identified in Policy CF3. This appraisal therefore assesses the cumulative effect of each housing option over and above the growth identified in the Phase 2 Preferred Option. The effect of each housing option on sustainable development is not considered in isolation as the Options Appraisal is about growth additional to that identified in the Phase 2 Preferred Option. This may mean that the appraisal indicates a negative or positive effect for a particular option even where the actual likely effect over and above the Phase 2 Preferred Option is negligible.
- 3.8 It has been assumed that all other policies of the Phase 2 Preferred Option are assumed to be taken forward as identified and therefore form a further background component to the SA. As identified in Section 2.0, the Options Appraisal proposes no amendments or changes to RSS policy.

Consultation

- 3.9 As this SA document comprises additional evidence, and does not form part of the SA (2007), it is not subject to the statutory consultation process as part of the Phase 2 Preferred Option. However, to ensure that the SA robustly reflects the requirements of the SEA Directive, additional consultation with statutory consultees has taken place to allow input into the SA process.
- 3.10 In addition, the SA's status as additional evidence means that it will not be subject to formal consultation but will be published alongside the NLP Housing Options Study and will be a material consideration in the wider consultation process on the WMRSS. Further consultation would be

required in the event that modifications to the Phase 2 Preferred Option are brought forward following the Examination in Public and additional SA is required as an addendum to the SA (2007).

- 3.11 In addition to meetings with statutory consultees at the inception of the SA of the housing options (May 2008), to review the scope of the methodology (July 2008) and to review the initial findings of the SA of the housing options (August/September 2008), issues in respect of the SA were raised as part of wider regional seminars forming part of the Options Appraisal process. Volume 1 provides a detailed summary of the key issues covered and raised at the two regional seminars which took place in May 2008 and July 2008 with a range of regional stakeholders, statutory consultees and interested parties. Evidence from the seminars has also been used to inform the SA process.

Difficulties

- 3.12 The following difficulties have been encountered in undertaking the SA of the housing options: -
1. As the baseline data and methodology of the SA (2007) has been utilised for the purposes of this appraisal, the identified uncertainties set out in that document about the likelihood and significance of effects remain a key issue for this SA.
 2. The limited review of baseline data to update and amend where appropriate has focused for ease of comparison and reference on the indicators and data sources utilised for the SA (2007). A broader analysis may have assisted in clarifying the likelihood and significance of effects; however this would have led to substantial difficulties in comparison of the conclusions of the SA (2007) with this appraisal in the context of evidence to the Examination in Public. The recognised difficulties set out in the SA (2007) as to the age, quality and reliability of the data used are also recognised.
 3. Due to the nature of the SA as evidence at this time, consultation has been restricted to those key statutory consultees rather than the more expansive consultation process underway as part of the Phase 2 WMRSS revision process as a whole. Additional information may be available which could assist in clarifying the likelihood and significance of effects, however this has not been available at this time.
 4. As was the case for the SA (2007), the WMRSS is a complex and wide ranging strategy covering a wide geographical area and a long timescale. As the nine options identify broad locations and areas of search rather than specific spatial locations for the development of additional growth, the appraisal of the implications on sustainable development cannot identify all of the spatially specific or longer term effects arising from each option. However, any SA carried out to inform Proposed Changes to the WMRSS (in the event that the Panel recommend such changes should be made) may be in a position to draw more specific conclusions in certain areas.
- 3.13 As for the SA (2007) it is considered that notwithstanding the difficulties identified above, it is still possible to draw some conclusions to provide sufficient evidence as to the effect of the options on the principles of sustainable development.

Relationship to the SEA Directive

- 3.14 The appraisal has been carried out to be consistent with the requirements of the SEA Directive as summarised in the table 3.1 below.

Requirements of SEA Directive	Location in this SA
An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Sections 1.0 and 2.0
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 4.0
The environmental characteristics of areas likely to be significantly affected	Section 4.0
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4.0; Appendix 1
The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 4.0; Appendix 1
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climactic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors	Section 6.0
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Section 7.0
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information	Sections 3.0 and 5.0
A description of measures envisaged concerning monitoring in accordance with Article 10	Section 8.0
A non-Technical summary of the information provided under the above headings	See Volume 3

Table 3.1 – Location of information required in respect of SEA Directive in this SA
Source: NLP