

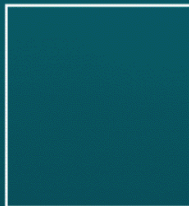
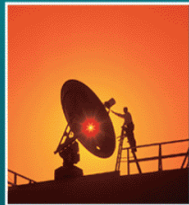
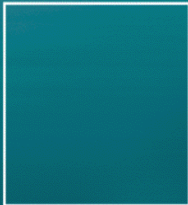
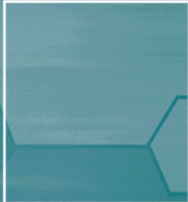
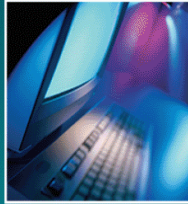
Black Country Consortium

## Sustainability Appraisal Report

### Draft RSS Phase One Revision: The Black Country

March 2006

Entec UK Ltd





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# Black Country Consortium

## Sustainability Appraisal of the Draft RSS Phase One Revision: The Black Country

Sustainability Appraisal Report

April 2006

Entec UK Ltd



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**Document Revisions**

No	Details	Date
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# 1. Non Technical Summary

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## 1.1 Introduction

This report outlines the findings of the Sustainability Appraisal (SA) of the Draft Regional Spatial Strategy (RSS) Phase One Revision: The Black Country.

The purpose of sustainability appraisal (SA) is to promote sustainable development through integrating of social, environmental and economic considerations into the revision of Regional Spatial Strategies (RSS).

The preparation of this final SA Report follows guidance issued by the government on Sustainability Appraisal<sup>1</sup> and the requirements of the regulations relating to Strategic Environmental Assessment<sup>2</sup>.

## 1.2 What is the Draft RSS Phase One Revision: The Black Country?

The Draft RSS Phase One Revision: The Black Country is the Urban Renaissance Strategy for the Black Country which includes the RSS policies for the Black Country together with supporting justification set out in the Black Country Study – Technical Report. It sets out why the Black Country needs to change, the strategic direction and scale of change, where the change is going to take place and how it will be delivered.

## 1.3 How was the Sustainability Appraisal carried out?

The SA has been carried out by Entec UK Ltd on behalf of the Black Country Consortium and West Midlands Regional Assembly under the guidance of the Sustainability Appraisal Steering Group chaired by Professor John Glasson of Oxford Brookes University.

The appraisal process has used a Sustainability Appraisal Framework, agreed with the SA Steering Group which contains 23 objectives covering social, economic and environmental issues within the Black Country.

The SA Framework has been used to appraise the likely effect of three potential directions of change for the Black Country and look at the extent to which each option contributes to the social, environmental and economic objectives, over what timescales; and whether there would

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<sup>1</sup> ODPM guidance, 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' November 2005.

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004)

be any secondary, cumulative or synergistic effects.<sup>3</sup> The significance of the effect has then been recorded.

The appraisal then looks at how the options have been developed into a preferred option and also undertakes an appraisal of the preferred option and makes recommendations for improvement.

## 1.4 What are the key sustainability issues affecting the Black Country?

These are set out below;

Sustainability Issues for the Black Country		
SA Objective	Strengths	Challenges
Community Participation	Levels of participation in community and volunteering in the region are comparable with the national average.  All Boroughs have community strategies.	Election turnout is low compared with the national average. 30% compared with 38% for England  Levels of, the type of social capital which facilitate social mobility, are low in the Black Country.
Crime	Crime rates for the Black Country are falling.	Overall crime statistics (offences per 1000 population) in 2002/3 were 126.3 per 1000 population, which is higher than the national average at 112.6 and regional average of 115.4.
Health and Social Welfare	Population health and well-being are largely determined by social, economic and environmental factors not the provision of, or access to, health services.  Overall the area is relatively well served for access to District General hospital services. For example the number of hospital beds per 10000 population is above the national average.  Health staffing levels are higher than the national average in many cases.	Health inequalities in the sub-region are significant with only 14% of wards having life expectancy better than, or equal to, the national average.  Many of the health problems associated with childhood and early adult life, such as infant mortality rate and teenage pregnancy rates, are highest in the most deprived areas.  Rates of chronic illness are higher than the national average.
Poverty	Sandwell, Wolverhampton and Walsall suffer from high levels of deprivation. Sandwell is the most deprived of the local authorities.	
Education	Educational attainment in schools has increased faster than the national average since 1997.  Over the last 3 years more adults than anywhere else in the West Midlands have achieved qualifications for the first time.  Over the last 3 years the number of young people undertaking learning has increased by 9%, well above	Educational attainment is lower than the national average.  General levels of literacy and numeracy are poor.  Areas of high deprivation and education standards have been low for decades.

<sup>3</sup> Secondary effects are effects that are not a direct result of the option but occur away from the original effect. Cumulative effects where several insignificant effects combine to have a significant effect. Synergistic effects occur where the total effect is greater than the sum of individual effects. *Annex 9 ODPM Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks Consultation Paper. 2004*

Sustainability Issues for the Black Country		
SA Objective	Strengths	Challenges
	<p>the national average.</p> <p>The Black Country benefits from having a culturally diverse population with many communities who have high expectations for learning.</p>	
Access to Services		There is a lack of data on this topic.
Culture and Recreation	<p>The wider region is characterised by the strength and range of cultural activities and venues, including sports and arts events of international acclaim.</p> <p>The Black Country has both a distinct cultural identity, dating back centuries, as well as a culturally and ethnically diverse population.</p>	There is a lack of comparable data about cultural and recreational activity within the Black Country.
Housing	<p>Housing is amongst the most affordable in the region.</p> <p>House prices are rising in line with the national average.</p>	<p>Addressing low demand and helping to restructure housing markets in such areas.</p> <p>Addressing the excess supply of social rented housing.</p> <p>Improving the quality of the affordable housing stock.</p> <p>Ensuring that problems of low demand do not spread to other neighbourhoods already at risk.</p> <p>Encouraging the development of more sustainable and balanced communities.</p> <p>Environmental conditions often discourage developers from providing a wider range of housing stock.</p>
Natural Resources		<p>Need to achieve water efficiency savings and reduce groundwater abstraction in light of household growth increase.</p> <p>Lack of Black Country level information on this topic.</p>
Transport	<p>Heavy rail network with local and regional links.</p> <p>Midland metro line.</p> <p>Good access from the Motorway network into the Black Country.</p> <p>Accessibility to the strategic road network.</p>	<p>Accessibility to parts of the sub-region is poor.</p> <p>Poor transport infrastructure discourages business investment.</p> <p>Existing congestion on the strategic road network and resultant pollution.</p> <p>To achieve a substantial shift away from car/lorry based travel.</p> <p>In 2002, 78% of people travelled to work by car with the bus attracting 9%. Only 5% used the train to get to work and 3% cycle and walk. Congestion/journey times mean travel time to work in 2002 was 27 minutes.</p> <p>The national targets for rail freight are an 80% increase in the volume carried by rail, increasing rail's share of the market by 10% by 2010.</p>
Waste	% of population served by kerbside collection ranges from 100% in Dudley, Walsall, 95% in Wolverhampton to 82.4% in Sandwell. This compares with the regional average of 77% and the national average of 86%.	<p>Recycling rates are poor compared with the national average.</p> <p>The percentage of household waste recycled in Dudley is 15.6%, Sandwell 10.7%, Walsall 18.7%, and for Wolverhampton 15.2%. Average for all authorities was 17.8% in 2004-2005</p>

Sustainability Issues for the Black Country		
SA Objective	Strengths	Challenges
		Target: Recycle 30% domestic waste by 2010
Historic Environment	Industrial heritage, including extensive canal network. Historic landscape characterisation work is being undertaken.	Little data on the historic environment at the Black Country level (particularly on the condition of buildings and other assets).  Widening appreciation and understanding of the historic environment.
Natural assets and biodiversity	Increase in the number of Local Nature Reserves from 1 in 1990 to 27 in 2000, which now cover 739 Ha.  Diverse geology within a comparatively small area.	Ensuring that changes in the landscape character of the Black Country are positive.  The disparity of the LNR provision within the Black Country.  Developing appropriate local indicators to reflect changes in landscape character.  Improving data on the condition of locally designated sites and on biodiversity loss and damage.
Local Environmental Quality	New development can be achieved primarily on previously developed land and there is little need for take up of greenfield land.  An extensive network of formal and informal green space.	Environmental quality is perceived as poor in much of the Black Country  High levels of environmental crime such as fly tipping.
Air, Water and Soil quality	Greatly improved water quality and improving biodiversity in rivers and canals.	There is a lack of comparable data for the Black Country.  Improving air quality given road traffic levels in parts of the Black Country.  Improving biological quality of water up to national standards associated with the Water Framework Directive.
Climate Change	Black Country is not significantly affected by areas liable to flood.	Lack of comparable data at the Black Country level.  Meeting the regional renewable energy generation target of 5% of electricity by 2010 and 10% by 2020.  Achieving the reduction of regional CO2 emissions by 18% (2.4 Mt) by 2010 and an additional 16% (1.5Mt) by 2020.  Need to reduce vulnerability to climate change, including minimising the percentage of new development on floodplains.
Economy	VAT registrations are stable and increasing at higher rates than the West Midlands average.  Business survival rates are improving.	VAT registrations lower than the national average.  Need to increase high value, knowledge economy activities.  Over dependence on metal manufacturing and the need to develop new skills to address the changing economic structure of the sub-region.
Employment		Less than 20% of workers in the Black Country are employed in sectors with the highest levels of knowledge

Sustainability Issues for the Black Country		
SA Objective	Strengths	Challenges
		Unemployment higher than the national average.
Skills		Low skilled workforce in comparison with the national average.

## 1.5 Are the Draft RSS Phase One Revision: The Black Country objectives compatible with the Sustainability Appraisal objectives?

The BCS objectives are considered to be compatible with the economic, social, environmental and good governance objectives of the Sustainability framework.

Entec consider that their previous recommendation to include an environmental objective has largely been taken on board. This greatly helps improve the sustainability performance of the BCS objectives. However it is still considered there are potential conflicts between some of the BCS social and economic objectives and the objective to conserve natural resources. Whilst it would have been preferable to reflect this issue in the BCS objectives, Entec would recommend that greater consideration is given to this issue and its implications both within and outside the Black Country

## 1.6 Are there any uncertainties or risks associated with the information collected?

Yes, relevant data is not readily available at the sub-regional level for several of the objectives which make it more difficult to assess the effects of the options and the preferred option.

## 1.7 What options have been considered?

Three potential directions of change have been considered:

**Direction of Change A – An emphasis on growing the four centres**

**Direction of Change B – An emphasis on growth along the corridors – canals and public transport routes**

**Direction of Change C – An emphasis on Planned Dispersal**

## 1.8 What was the result of the options appraisal?

Directions of Change B (Corridors) and A (Centres) appear to perform significantly better than Direction of Change C (Planned Dispersal) against the range of environmental, social and economic objectives due to the opportunities for environmental improvements, economic restructuring, enhanced transport links and improved access to facilities. However negative effects in respect of transport have been identified by the PRISM model in respect of congestion within the centres. Also, neither Direction of Change A nor B is able to deliver both the housing and employment land requirements. There are some positive elements to Direction of Change C such as community identity, less congestion within the centres (based on PRISM) and an ability to deliver employment requirements. These key elements are worthy of further consideration.

Option	Overall performance	Comment
<b>Potential Direction of Change A: Centres</b>	<b>+</b>	<p>This Direction of Change performs well against many of the sustainability objectives. Again emphasis on the four centres coincides with areas of deprivation whilst also providing considerable opportunity to deliver economic improvements through the expansion of centres for retailing, leisure and office space.</p> <p>Centres also provide considerable opportunities to develop viable public transport and enhance accessibility to facilities, and as noted for Direction of Change B it also corresponds with planned reconfiguration of health and social care services.</p> <p>Although the Centres approach is able to deliver the employment land requirement, it is not able to deliver the housing requirement which indicates that this option would result in a significant increase in congestion on routes into the centres.</p>
<b>Potential Direction of Change B: Corridors</b>	<b>+</b>	<p>This Direction of Change represents the most radical change in land use pattern and therefore presents considerable opportunity to deliver environmental improvements. The development pattern would coincide with the areas of greatest deprivation and again offer opportunities for improvements to be put in place. It corresponds with planned reconfiguration of health and social care services. The corridor approach is the only one which can deliver the housing requirement of the strategy and is therefore best placed to contribute to the housing objective. In contrast however, it cannot deliver the employment land requirement, particularly in respect of land for logistics. Also of concern are the results of the PRISM model which suggest that this Direction of Change would lead to the greatest increase in congestion on routes into the centres</p>
<b>Potential Direction of Change B: Corridors</b>	<b>-</b>	<p>This Direction of Change performs poorly against a number of the sustainability objectives primarily because it represents the approach most akin to the status quo. Continuing with the current pattern of land use is less likely to be sustainable and will continue the environmental, social and economic difficulties in the area. Notwithstanding this the planned dispersal does have a number of positive effects including;</p> <p>Opportunities to build on a strong sense of community within the many</p>

		centres of the Black Country drawing on the valuable cultural benefits arising from the ethnic diversity of the population.  An ability to deliver the required amount and type of employment land.  Based on the PRISM model, the least worst option for congestion.
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## 1.9 How has the SA helped in choosing the preferred option?

The table below summarises some of the key issues which emerged from the Options Appraisal and how they helped influence the Preferred Option.

	Issues	How addressed in Preferred Option
Social	Development under Directions of Change A and B is concentrated around areas of existing deprivation and therefore offer considerable opportunities for those communities, due to the scale of land use change envisaged.	The preferred option focuses on a hybrid approach which combines the centres and corridors options. As such development will be focused around the existing areas of deprivation.
	Strong sense of community within the many centres of the Black Country drawing on the valuable cultural benefits arising from the ethnic diversity of the population. This emerged as a positive benefit of Potential Directions of Change C.	Policy UR1A includes specific reference to supporting “ <i>the network of local centres and communities which exists</i> ”
Economic	The corridor approach is the only one which can deliver the housing requirement of the strategy. In contrast however, it cannot deliver the employment land requirement, particularly in respect of land for logistics. Although the Centres approach is able to deliver the employment land requirement, it is not able to deliver the housing requirement.	By combining the centres and corridors approach in the preferred option it has been possible to develop a strategy which could deliver both the housing and employment land requirements.
Environmental	The results of the PRISM modelling of the Potential Direction of Change suggested that the corridors and centres options would lead to the greatest increase in congestion on routes into the centres although it is accepted that the modelling for the corridors was carried out on a two centre approach.	The preferred option gives significant prominence to public transport infrastructure through the inclusion of the two Metro extensions schemes under National and regional Priorities in T12. In addition the strategy develops the idea of the Black Country Express integrated Metro, Rail, Bus and Coach travel in the sub-region.
Economic	Planned dispersal of certain key employment developments, for example logistics, may be beneficial in terms of relating such development close to the motorway network.	This principle is accepted in the Preferred Option although not specifically referenced in policy.

	The pattern of planned dispersal as set out in Potential Direction of Change C is likely to continue existing social, environmental and economic problems for the Black Country.	Planned dispersal has not been taken forward into the preferred option due to its poor performance against sustainability objectives.
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## 1.10 What was the Preferred Option chosen?

The Preferred Option selected represents a hybrid of the corridors and centres approach whilst retaining a recognition of the role of smaller centres. This took account of the results of the SA process. It is briefly summarised below.

**Preferred Option**

Focus for regeneration on the four centres and four key growth corridors.

## 1.11 How did it perform against the sustainability objectives?

A detailed appraisal of the main Urban Renaissance policy UR1A was undertaken and is summarised below:

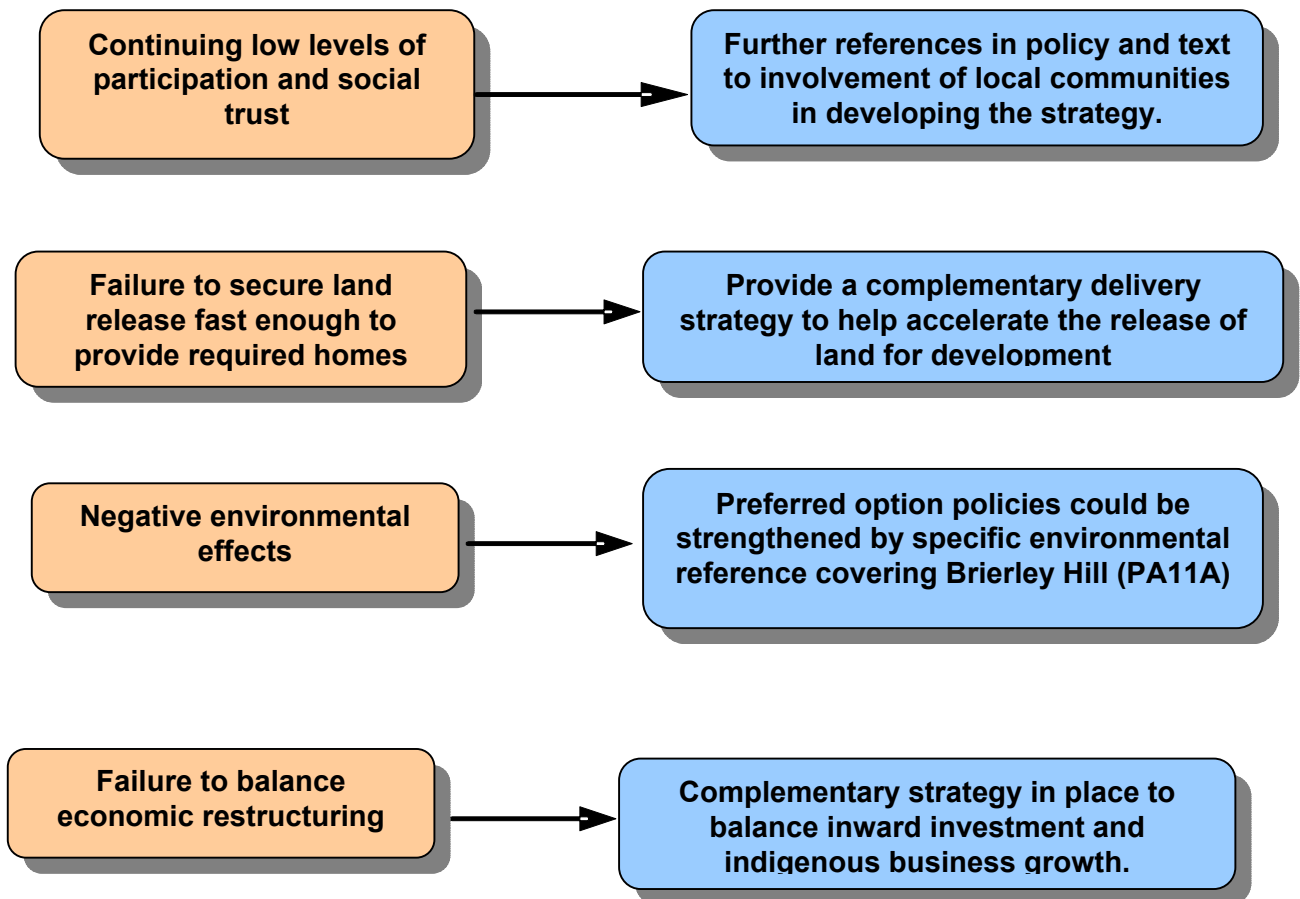
Objectives	Overall performance	Comment
<b>Social</b>	<b>++</b>	The overall effect of the urban renaissance proposed under Policy UR1A and the preferred strategy is positive on these objectives. The effects on crime, poverty, housing, education and health are closely linked.
<b>Environmental</b>	<b>++</b>	The overall effect of strategy proposed under Policy UR1A is positive on these objectives. The development of the Landscape Plan as set out in policy will have clear positive benefits for objectives relating to the historic environment, biodiversity and landscape, local environmental quality and pollution.
<b>Economic</b>	<b>++</b>	The strategy set out in Policy UR1A1 contributes positively to economic objectives. It clearly sets out a focus for Employment Land Investment Corridors and for planned growth in the strategic centres. This will have positive effects on objectives relating to the economy, job opportunities, investment, skills, innovation and new technology.

The other policies were also appraised and generally considered to have positive effects on the social, economic and environmental objectives although potential improvements were identified which are dealt with below.

## 1.12 How could the RSS policies be improved?

A key element of the SA process is to make recommendations for improvement. Entec have also given consideration to the risks which may arise from the Black Country Study – Technical Report and the RSS policies. These are briefly summarised below.

Entec have considered the recommended mitigation measures set out in *Sustainability Appraisal of the Black Country Study – Appraisal of Potential Directions of Change October 2005 Entec UK Ltd* with a view to considering the extent to which they have been taken on board within the Preferred Option. It is evident that in developing the Preferred Option policies a number of the key mitigation measures have been taken aboard. These are summarised in the diagram below:



## 1.13 What proposals are in place for monitoring?

The SA report sets out an approach towards monitoring which would be linked to the Annual Monitoring required for the Regional Spatial Strategy. A number of indicators are suggested

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based on the Sustainability Appraisal work whilst Entec have also identified areas where further work on indicators and data is required.

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**Annex A: Revised Draft Sustainability Appraisal Scoping Report November 2005**

**Annex B: 1<sup>st</sup> Appraisal of Options July 2005**

**Annex C: Appraisal of Potential Directions of Change October 2005**

**Annex D: Sustainability Appraisal of Draft RSS Policies for the Black Country March 2006**

**Annex E: Sustainability Appraisal of revised draft RSS policies and emerging Black Country Study Technical Document April 2006**



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## 2. Introduction

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### 2.1 Introduction

This document is the Sustainability Appraisal (SA) Report for the Draft Regional Spatial Strategy Phase One Revision: The Black Country. It has been produced following the implementation of the European Commission Directive 2001/42/EC (transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004) which requires that a Strategic Environmental Assessment (SEA) be undertaken for certain plans and programmes (“SEA Regulations”). The Directive is commonly known as the SEA Directive. This report also follows guidance set out in *A Practical Guide to the Strategic Environmental Assessment Directive*, published by the Office of the Deputy Prime Minister (ODPM) in September 2005 and *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents ODPM 2005* (“ODPM SA Guidance”). The format of this report broadly follows the structure and contents of the Sustainability Report provided within Figure 40, Annex 15 of this latter document.

Its completion also enables the West Midlands Regional Assembly to meet its requirements under Section 39 of the Planning and Compulsory Purchase Act 2004, which requires it to “exercise the [spatial planning] function with the objective of contributing to the achievement of sustainable development”.

### 2.2 Purpose of the SA and SA report

This final Sustainability Appraisal (SA) Report outlines the findings of the sustainability appraisal of the Draft RSS Phase One Revision: The Black Country.

This report deals with the likely significant effects of the draft RSS policies for the Black Country and the supporting strategy which is set out in the Black Country Study – Technical Report, together with the extent to which the implementation of this study will achieve the social, environmental and economic objectives by which sustainable development can be defined.

#### 2.2.1 Sustainable Development and Regional Spatial Strategies

Section 5 of the Planning and Compulsory Purchase Act 2004 requires Regional Planning Boards (RPB) to prepare a draft revision of their RSS. In preparing the draft revision the RPB are required, amongst others, to undertake an appraisal of the sustainability of the proposals in the draft and to prepare a report of the findings of the appraisal. Sustainability appraisal is a systematic and iterative appraisal process that should incorporate the requirements of the SEA Directive; the purpose being to appraise the social, environmental and economic effects of the strategies and policies in the RSS. Planning Policy Statement 11: Regional Spatial Strategies recommends (paragraph 2.10) that a starting point and background against which RSS’s should be assessed is the relevant Regional Spatial Development Framework (RSDF). The RSDF is the high level statement of the regional vision for achieving sustainable development and provides an essential part of the background against which all regional strategies are prepared. It

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should be the starting point for developing a RSS, putting sustainable development at the heart of a spatial strategy in accordance with section 39 of the Act. The RSDF also has a key role in identifying and resolving any conflicts between the RSS and other regional strategies to ensure a fully integrated approach to sustainable development.

## **2.3 Outline of the contents of the Draft RSS Phase One Revision: The Black Country**

The SEA Regulations require that an outline of the main objectives of the plan is provided. The Black Country Vision is:

### **The Black Country Vision**

*‘In 2033, the Black Country is a confident, ‘we can do it’ place. We are proud of our skills, our proficiency and our work ethic – these are key to our prosperity. The Black Country is now a truly Polycentric City– made up of four thriving and distinct retail and commercial ‘City’ centres – each one playing a unique role’.*

*‘In summary, the Black Country Vision for 2033 is of a Black Country comprising many different communities – offering a choice of very desirable housing for all. We will be celebrating our multi-cultural society. Educational attainments will match anywhere in Europe. A transport revolution will have taken place with our bus, Metro, rail and road networks making it easy to move around the Black Country, into Birmingham and to the rest of the City Region.’*

*‘Our manufacturing companies will be prospering, at the cutting edge of technological innovation. Our four main centres – Wolverhampton, Walsall, West Bromwich and Brierley Hill/Merry Hill – will each offer a distinctive, wide range of shopping, leisure and cultural facilities, office employment, and housing. Our canal system, linking our communities together, means we are known as Britain’s Venice. Our high quality environment – not our industrial legacy - dominates the urban landscape.’*

The strategic objectives for the Draft RSS Phase One Revision: The Black Country, which will be transposed into the Draft RSS are reproduced below and considered later within this document at Section 5 and in Annex A.

- **to reverse out-migration**
  - ◆ accommodating within the Black Country all of the generated household growth from 2011 onwards.
  - ◆ testing scenarios involving higher growth levels (between +5% and +15%)
- **to raise income levels**
  - ◆ raising demand and household incomes (average earnings, GDP per head and reducing unemployment) to the UK average by 2033.
  - ◆ testing scenarios to raise levels significantly above the UK average
- **to change the socio-economic mix**
  - ◆ achieving parity with the national profile of social grade in the population by increasing the proportion of A/B grades from 14.8% to 22% by 2033.
  - ◆ testing the scenario of achieving this by 2021.
- **to transform the environment**
  - ◆ to protect and enhance the environment and to create a safe, attractive and healthy place to live and work.

### 2.3.1 The Black Country Study and RSS Policies

The Draft RSS Phase One Revision: The Black Country is the Urban Renaissance Strategy for the Black Country which forms the basis for developing the Regional Spatial Strategy policies for the Black Country. The role of the Black Country Study is set out in greater detail in the Black Country Study Technical Report.

In terms of the Sustainability Appraisal it is however important to understand the relationship between the RSS policies and the Black Country Study – Technical Report. Sustainability Appraisal must be undertaken on the RSS policies for the Black Country as required by the Planning and Compulsory Purchase Act 2004 and the SEA Regulations. The Black Country Study itself will result in a non-statutory Technical Report which will provide most of the evidence base and supporting justification for the RSS policies. Although the Black Country Study – Technical Report itself does not require Sustainability Appraisal, Entec and the SA Steering Group considered that the role of the Study report in supporting the RSS policies is so critical that the sustainability of the Black Country Study - Technical Report should also be tested.



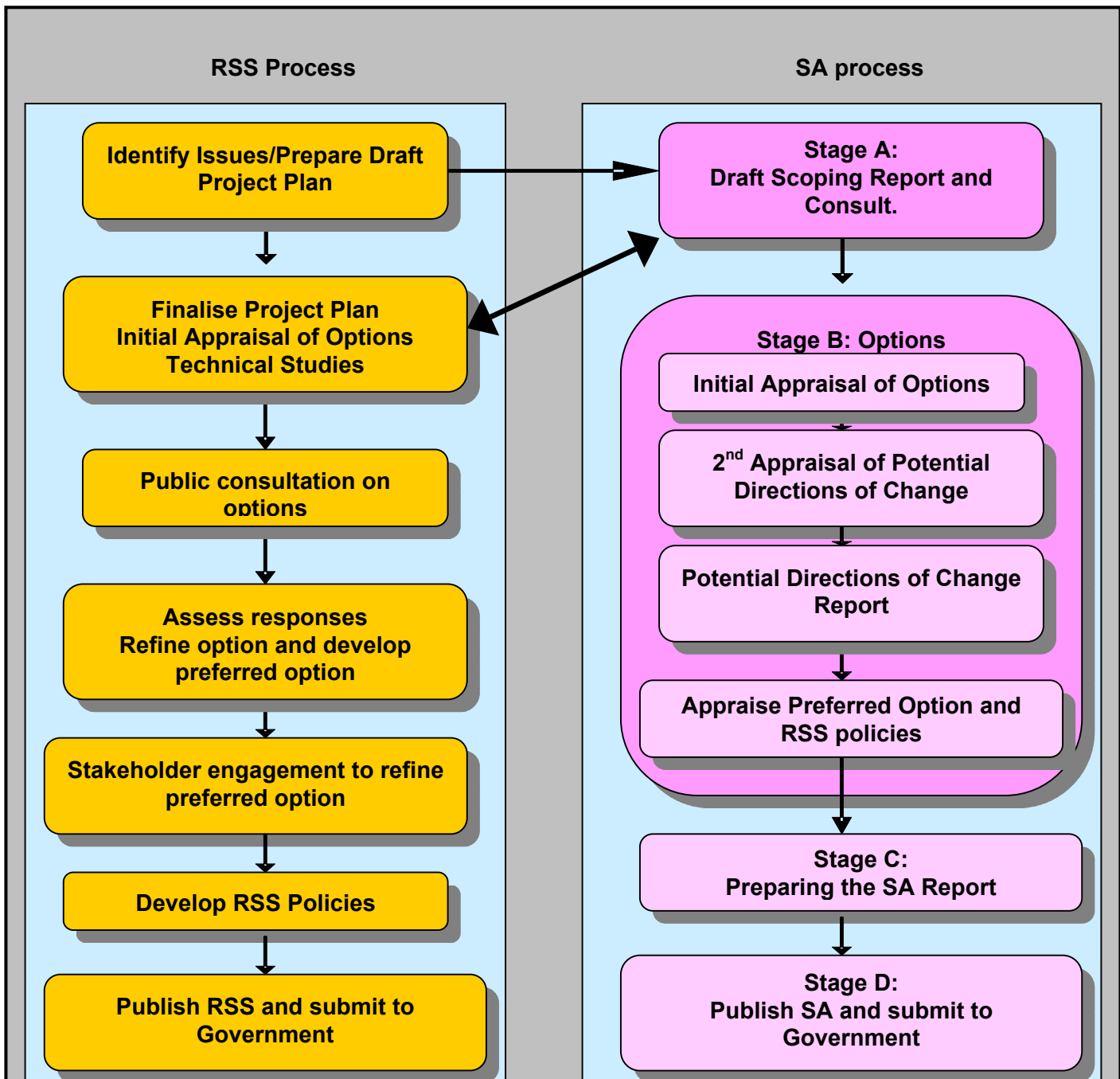
### 3. Appraisal Methodology

This section seeks to outline the methodology used to assess the sustainability of the draft RSS policies and Black Country Study – Technical Report. The methodology was originally issued for consultation within the Black Country SA Scoping Report in March 2005. Comments received were then used to refine the approach.

#### 3.1 Approach adopted to the SA

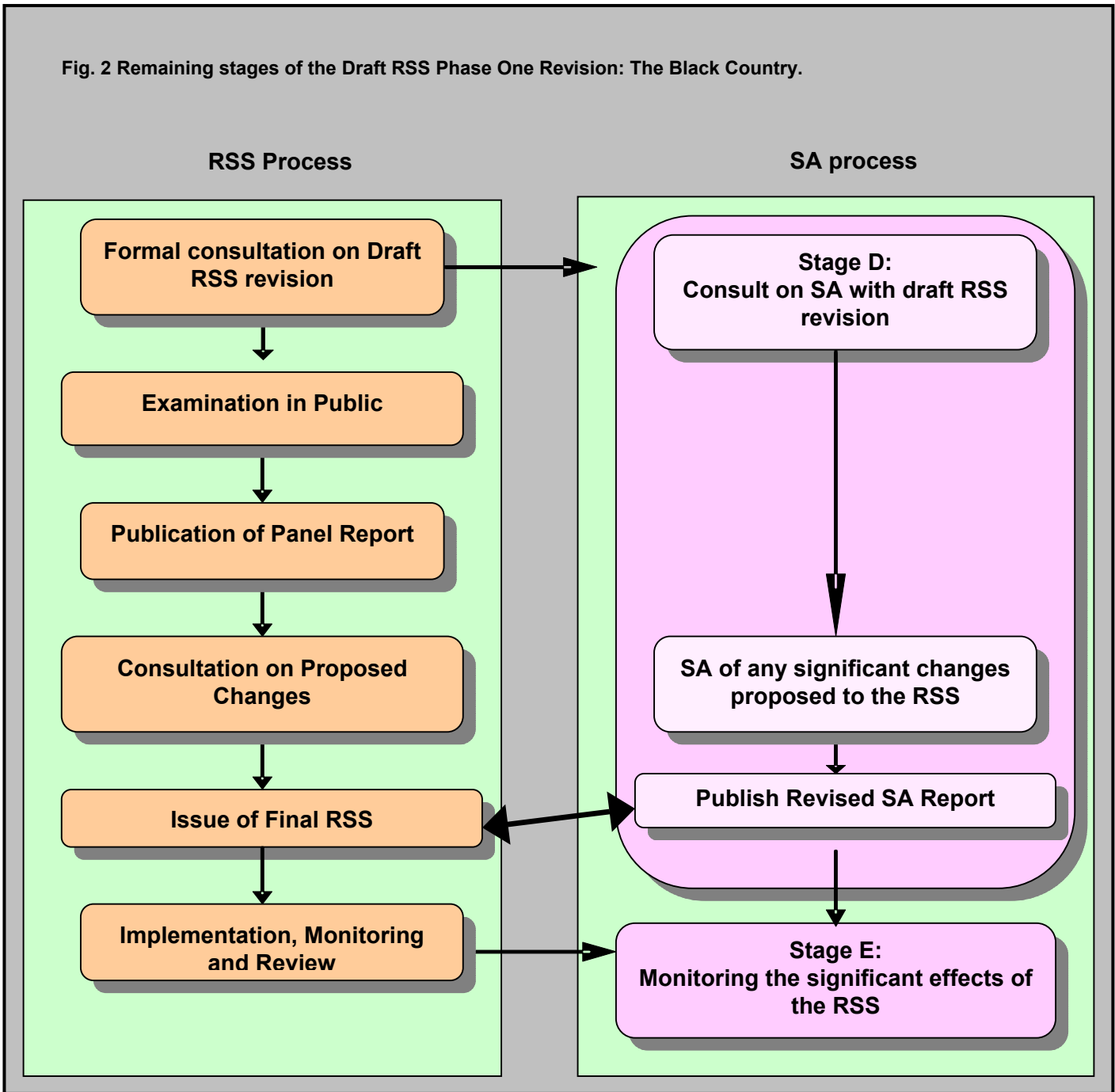
The diagram below illustrates the relationship between the SA process and the Draft RSS Phase One Revision: The Black Country.

Fig. 1 Relationship between RSS process and SA process



The above diagram sets out the process to date and the latter stages of the process which have not been undertaken are set out below.

Fig. 2 Remaining stages of the Draft RSS Phase One Revision: The Black Country.



## 3.2 Timescales and responsibilities for carrying out the SA

The Sustainability Appraisal has been carried out by consultants under the guidance of the Sustainability Appraisal Steering Group set up with an independent chair, Professor John Glasson. The Steering Group includes representatives from a range of partner organisations including the West Midlands Regional Assembly, the Government Office for the West Midlands, Sustainability West Midlands and local authorities. In addition a Sustainability Appraisal Reference Group was set up to provide an independent source of advice and guidance on sustainability issues relating to the Draft RSS Phase One Revision: The Black Country, in particular the interplay between the environmental, social and economic factors. It includes over 40 organisations and individuals from across the Black Country and West Midlands.



Work began on the appraisal in January 2005 when the scope, context and objectives were established along with the baseline data. Reports were issued at key stages in the process and these form the basis of Annexes A – E. A summary of the key dates and reports is given below.

**Table 3.1 Summary of key SA dates**

Date	
March 2005	Consultation Draft SA Scoping report
19 <sup>th</sup> /20 <sup>th</sup> May 2005	1 <sup>st</sup> Options Appraisal Workshop
July 2005	1 <sup>st</sup> Appraisal of Options Report (Annex B)
26 <sup>th</sup> /27 <sup>th</sup> September 2005	2 <sup>nd</sup> Options Appraisal Workshop
October 2005	Appraisal of Potential Directions of Change Report (Annex C)
November 2005	Revised SA Scoping Report
27 <sup>th</sup> February 2006	1 <sup>st</sup> Appraisal workshop for draft RSS policies
March 2006	Sustainability Appraisal of Draft RSS policies for the Black Country Report
20 <sup>th</sup> March 2006	2 <sup>nd</sup> Appraisal Workshop for RSS policies and Black Country Study Technical Report

April 2006	Final SA Report including Appraisal of revised draft RSS Policies for the Black Country and emerging Black Country Study Technical Report (Annex E).
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### 3.3 Who was consulted, when and how

Consultation was undertaken at key stages throughout the SA process and this is summarised below. The structure set out above allowed for organisations to input into the process throughout and not just during the formal consultation periods. Consultation was undertaken with a range of organisations across the Black Country including statutory agencies, local authorities and business, community and environmental groups as well as the general public. A variety of consultation methods were used including workshops.

**Table 3.2 Summary of SA Consultation**

Stage	Who consulted	How
Stage A: SA Scoping Stage	Statutory Agencies <sup>4</sup> , local authorities, business, community and environmental organisations.	Email consultation on draft SA Scoping Report
Stage B: Sustainability Appraisal of Options	Statutory Agencies, selected business, community and environmental organisations.	Workshops
Stage B: Black Country Choices consultation	Statutory Agencies, selected business, community and environmental organisations and the public.	Formal consultation alongside RSS. Mail outs, web publicity, consultation events.
Stage B: Developing the Preferred Option and RSS Policies	Statutory Agencies, local authorities, business, community and environmental organisations.	Workshops
Stage B throughout	SA Reference Group	Consultation events, E-mail consultation

### 3.4 Difficulties encountered

The SEA Directive requires the identification of any difficulties encountered. Table 3.2 summarises those encountered during the appraisal process.

<sup>4</sup> Including English Heritage, English Nature, Countryside Agency and Environment Agency

**Table 3.3 Difficulties encountered during the SA**

Stage	Difficulties
Setting the context, establishing the baseline and developing the SEA objectives	<p><b>Review of plans and programmes:</b> the key plans and programmes were reviewed, but there may be other relevant documents which were not included.</p> <p><b>Baseline data collection:</b> it was not possible to collect quantitative information for all of issues covered by the SEA/SA objectives at the Black Country scale. In these cases it was necessary to extrapolate from studies elsewhere or to rely on broader contextual information for the West Midlands. In some cases, it was not possible to find trend or comparative data. A lack of quantitative data was available particularly in relation to community participation, access to services, culture and recreation, natural resources, climate change and innovation.</p>
Designing the appraisal framework	It was difficult to identify targets and indicators for a number of the objectives notably access to services, soil quality, investment and innovation.
The Scoping Report	Significant amounts of new baseline information became available during the SA process and therefore the Scoping Report was significantly revised following initial consultation.
Developing and assessing options	<p>Particularly during the early stages of considering the options there was a lack of information on the options which made assessing the effects difficult. Information was often provided at very short notice in relation to appraisal workshops and this also made it difficult to assess the effects comprehensively.</p> <p>Lack of baseline information has meant that many of the effects predictions have been based on qualitative rather than quantitative judgements.</p>
Assessing the RSS	
Environmental Report	Lack of baseline information on some issues made it harder to develop a potential set of indicators to monitor the effects of the RSS policies.

### 3.5 Compliance with the SEA Directive/Regulations

The report is considered to incorporate the requirement for SEA stemming from Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment whilst the requirement for SA for Regional Spatial Strategies is mandatory within the Planning and Compulsory Purchase Act 2004. The table below sets out how the report complies with the requirements of the SEA Directive.

**Table 3.4 Compliance with SEA Directive/Regulations**

SEA Directive Requirement	Where covered in SA process
Preparation of an <b>environmental Report</b> , detailed below (Article 5).	This Sustainability Appraisal incorporating the environmental report will be published alongside the draft RSS policies for public consultation.
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	Section 2.3 – Contents of the Draft RSS Phase One Revision: The Black Country. Appendix 1: RSS policies. Section 4.2 – Review of other plans and programmes Section 5.2 Objectives of Draft RSS Phase One Revision: The Black Country. Annex A: Revised SA Scoping Report November 2005
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;	Section 4.3 and 4.4 and Annex A: Revised SA Scoping Report November 2005.
(c) the environmental characteristics of areas likely to be	Section 4.3 and 4.4 and Annex A: Revised SA Scoping Report

SEA Directive Requirement	Where covered in SA process
significantly affected;	November 2005.
(d) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 4.4 and Annex A: Revised SA Scoping Report November 2005.
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	Annex A: Revised SA Scoping Report November 2005.
(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 5.4, 5.5 and 5.6. Annex B: 1 <sup>st</sup> Appraisal of Spatial Options July 2005. Annex C: Appraisal of Potential Directions of Change October 2005 and Annex D: Sustainability Appraisal of Draft RSS policies March 2006.
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Section 8 and Annex C: Appraisal of Potential Directions of Change October 2005 and Annex D: Sustainability Appraisal of Draft RSS policies March 2006.
(h) 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;	Section 3 and Section 5.3
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;  Refer to paragraphs 36-37	Section 6.
(j) A non-technical summary of the information provided under the above headings.	A non technical summary is provided at the start of the Sustainability Report.
<b>Consult</b> responsible environmental authorities on the scope and level of detail of the information which must be included in the environmental report.	Consultation was undertaken with the environmental authorities on the Scoping Report (see Revised SA Scoping Report November 2006.
<b>Consult with responsible environmental bodies</b> – the Countryside Agency, Environment Agency, English Heritage, English Nature – and the public on the draft plan and the Environment Report before the plan is adopted (Article 6).	This sustainability report is published alongside the draft RSS policies for consultation with the statutory bodies.
Take into account the Environment Report and consultation responses during the <b>preparation of the plan</b> before it is adopted (Article 8).	This sustainability report and consultation responses will be taken into account before the RSS policies are approved.
When a plan is adopted responsible environmental bodies and the public and other <b>relevant bodies will be informed</b> of (Article 9):  (a) The plan as adopted;  (b) A statement summarising how environmental considerations have been integrated into the plan, how any consultation responses have been taken into account and the reasons for choosing the plan as adopted;  (c) The measures for monitoring.	Responsible environmental bodies, the public and other relevant bodies will be informed of the appropriate documents when the RSS policies are approved.
<b>Monitor</b> the significant environmental effects of the implementation of plans to identify at an early stage	Regional Planning Bodies are required to prepare an Annual Monitoring Report to describe how policies are being implemented. Entec

SEA Directive Requirement	Where covered in SA process
unforeseen adverse effects and so to take remedial action (Article 10).	recommend that the SA monitoring process is linked to that required for Annual Monitoring.

## 3.6 The Approaches Adopted in the Appraisal Process

There are a number of specific tools and techniques used to undertake the tasks identified in Figure 1 which are described in more detail in the following sub-section. They include:

1. Undertaking Appraisal Workshops:
2. Measuring Significance:
3. Developing and Assessing Options/ Alternatives:
4. Identifying Health Impacts.

### 3.6.1 Undertaking Appraisal Workshops

The main tool used for assessing the performance of the options and emerging policies was a workshop appraisal. The aim of the workshop is to appraise the issues that face the region and the extent to which options or policies will support or detract from them. These sessions provide the opportunities for discussion to be held and the differences of options and policies to be recorded within an overall matrix. The appraisal matrix also provides the opportunity to consider significance and the extent to which the policy or option may move the Black Country towards or away from sustainable development.

### 3.6.2 Measuring Significance

Schedule 1 of the SEA Regulations provides criteria for determining the likely significance of effects, which should have regard to the characteristics of the plan or programme (e.g. the relevance of the plan for integration of environmental considerations) and the areas likely to be affected (e.g. the value of the receiving environment and factors related to the area's special characteristics) and the nature of those effects (e.g. the reversibility of the effect, its duration and frequency, its cumulative nature and spatial extent etc).

Further advice on the assessment of effects is provided within Annex 12 and 13 of the ODPM Guidance, November 2005. During the assessment of the Draft RSS Phase One Revision: The Black Country options and policies the following effects were considered:

Direction of Effect: is the effect positive or negative in terms of sustainability;

Severity of Effect: will the effect be marginal or significant? This is a qualitative conclusion based on professional judgement and opinions received through consultation, and is considered relative to baseline evidence;

Geographical Scale: will the effect be felt differentially within the Black Country and/or outside the sub-region?

Timing of Effect: will the effect manifest itself in the short, medium or long term?

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Cumulative Effects: there may be scope for some cumulative effects. Such effects could be positive or negative.

### **3.6.3 Developing and Assessing Options/ Alternatives**

The SEA Directive states that the Environmental Report should consider ‘*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*’ and give ‘*an outline of the reasons for selecting the alternatives dealt with*’ (Article 5.1 and Annex 1(h)). It is not the purpose of the SEA/SA to decide which option (alternative) should be chosen for the strategy, this is the role of the decision-makers. The SA simply provides information on the relative sustainability performance of options. The process of developing options for the Black Country involved considering potential directions of change (options). Further explanation on the development of options, and the appraisals, their results and recommendations are provided within Section 5 and Annex B and C.

### **3.6.4 Identifying Health Effects**

As described above the appraisal process recognises inequalities within the sub- region. There are high levels of deprivation in the area. This is associated with high levels of ill health and self reported illness, late presentation of serious conditions, high rates of consultation and emergency hospital admission and inability to self care for minor illness or chronic disease. The health services in the Black Country face a significant challenge in meeting the demand for health services and all stakeholders need to share the challenge of protecting and improving the health of the population.

A workshop with a focus on health and wellbeing issues was held to ensure these issues were considered within the SA process. Health input to the Sustainability Appraisal is set out in detail in Appendix D to Annex C.

## **4. Sustainability, objectives, baseline and context**

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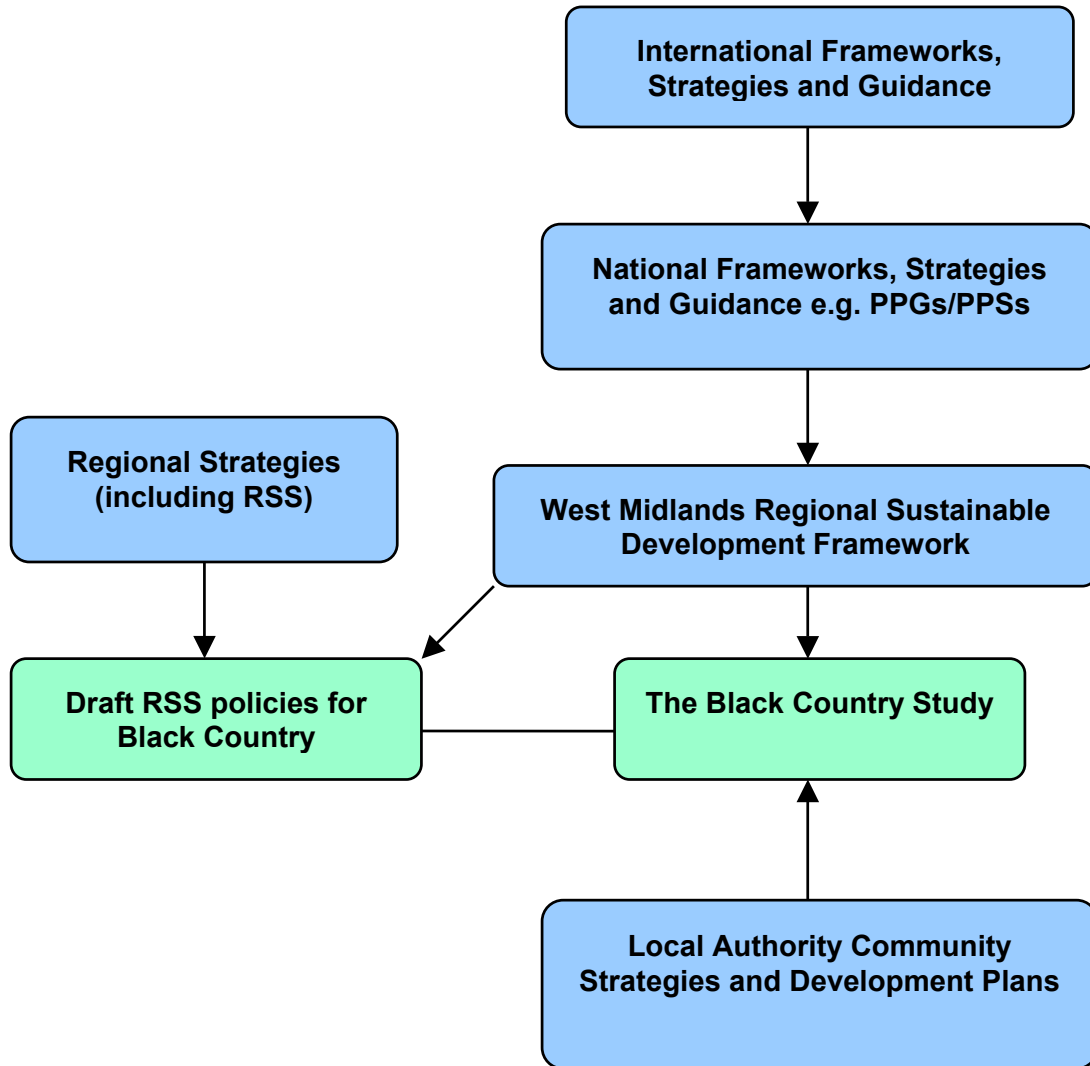
### **4.1 Introduction**

The purpose of this section is to set out the sustainability objectives, baseline and context for the Black Country Study – Technical Report and the RSS policies for the Black Country. This is set out in detail in Annex 1: Revised SA Scoping Report, however the key information is summarised below

### **4.2 Review of other plans and programmes**

There are a number of strategies prepared to guide the future of the Black Country. These documents are identified within Annex A. An assessment of the implications of the documents for the SA process is provided within Annex A. The key relationships between the various documents are shown below.

**Fig. 3 Relationship of the Draft RSS Phase One Revision: The Black Country to other Plans and Programmes**



The relevance of considering other Strategies, Plans and Programmes is to understand the context within which the Draft RSS Phase One Revision: The Black Country will sit, together with the extent to which they can actually influence the delivery of certain, agreed sustainability objectives. The review is also a useful precursor to the collection of baseline information and to the identification of indicators.

### 4.3 Baseline information

The baseline social, environmental and economic characteristics are set out in detail in Annex A: Revised SA Scoping Report November 2005. The table below provides a summary of the key baseline characteristics and issues.

**Table 4.1 Sustainability Issues for the Black Country**

Sustainability Issues for the Black Country		
SA Objective	Strengths	Challenges
Community Participation	<p>Levels of participation in community and volunteering in the region are comparable with the national average.</p> <p>All Boroughs have community strategies.</p>	<p>Election turnout is low compared with the national average. 30% compared with 38% for England</p> <p>Levels of, the type of social capital which facilitate social mobility, are low in the Black Country.</p>
Crime	<p>Crime rates for the Black Country are falling.</p>	<p>Overall crime statistics (offences per 1000 population) in 2002/3 were 126.3 per 1000 population, which is higher than the national average at 112.6 and regional average of 115.4.</p>
Health and Social Welfare	<p>Population health and well-being are largely determined by social, economic and environmental factors not the provision of, or access to, health services.</p> <p>Overall the area is relatively well served for access to District General hospital services. For example the number of hospital beds per 10000 population is above the national average.</p> <p>Health staffing levels are higher than the national average in many cases.</p>	<p>Health inequalities in the sub-region are significant with only 14% of wards having life expectancy better than, or equal to, the national average.</p> <p>Many of the health problems associated with childhood and early adult life, such as infant mortality rate and teenage pregnancy rates, are highest in the most deprived areas.</p> <p>Rates of chronic illness are higher than the national average.</p>
Poverty	<p>Sandwell, Wolverhampton and Walsall suffer from high levels of deprivation. Sandwell is the most deprived of the regional centres.</p>	
Education	<p>Educational attainment in schools has increased faster than the national average since 1997.</p> <p>Over the last 3 years more adults than anywhere else in the West Midlands have achieved qualifications for the first time.</p> <p>Over the last 3 years the number of young people undertaking learning has increased by 9%, well above the national average.</p> <p>The Black Country benefits from having a culturally diverse population with many communities who have high expectations for learning.</p>	<p>Educational attainment is lower than the national average.</p> <p>General levels of literacy and numeracy are poor.</p> <p>Areas of high deprivation and education standards have been low for decades.</p>
Access to Services		<p>There is a lack of data on this topic.</p>
Culture and Recreation	<p>The wider region is characterised by the strength and range of cultural activities and venues, including sports and arts events of international acclaim.</p>	<p>There is a lack of comparable data about cultural and recreational activity within the Black Country.</p>

<b>Sustainability Issues for the Black Country</b>		
SA Objective	Strengths	Challenges
	The Black Country has both a distinct cultural identity, dating back centuries, as well as a culturally and ethnically diverse population.	
Housing	Housing is amongst the most affordable in the region.  House prices are rising in line with the national average.	Addressing patterns of low demand and facilitating the restructuring of housing markets in such areas.  Addressing the oversupply of social rented housing.  Improving the quality of the affordable housing stock.  Ensuring that problems of low demand do not spread to other neighbourhoods already at risk.  Encouraging the development of more sustainable and balanced communities.  Environmental conditions are often a disincentive to providing a wider range of housing stock.
Natural Resources		Surface water capacity throughout the region is mostly committed.  Need to achieve water efficiency savings and reduce groundwater abstraction in light of household growth increase.  Lack of Black Country level information on this topic.
Transport	Heavy rail network for with local and regional links.  Midland metro line.  Good access from the Motorway network into the Black Country.  Accessibility to the strategic road network.	Accessibility to parts of the sub-region is poor.  Transport infrastructure is a disincentive to business investment.  Existing congestion on the strategic road network and resultant pollution.  To achieve a substantial modal shift away from car/lorry based travel.  In 2002, 78% of people travelled to work by car with the bus attracting 9%. Only 5% used the train to get to work and 3% cycle and walk. Congestion/journey times- mean travel time to work in 2002 was 27 minutes.  The national targets for rail freight are an 80% increase in the volume carried by rail, increasing rails share of the market by 10% by 2010.
Waste	% of population served by kerbside collection ranges from 100% in Dudley, Walsall, 95% in Wolverhampton to 82.4% in Sandwell. This compares with the regional average of 77% and the national average of 86%.	Recycling rates are poor compared with the national average  The percentage of household waste recycled in Dudley is 15.6%, Sandwell 10.7%, Walsall 18.7%, and for Wolverhampton 15.2%. Average for all authorities was 17.8%/ in 2004-2005  Target: Recycle 30% domestic waste by 2010
Historic Environment	Industrial heritage, including extensive canal network.  Historic landscape characterisation work is being undertaken.	Little data on the historic environment at the Black Country level (particularly on the condition of buildings and other assets).  Widening appreciation and understanding of the historic environment.

Sustainability Issues for the Black Country		
SA Objective	Strengths	Challenges
Natural assets and biodiversity	<p>Increase in the number of Local Nature Reserves from 1 in 1990 to 27 in 2000, which now cover 739 Ha.</p> <p>Diverse geology within a comparatively small area.</p>	<p>Ensuring that changes in the landscape character of the Black Country are positive.</p> <p>The disparity of the Local Nature Reserve provision within the Black Country.</p> <p>Developing appropriate local indicators to reflect changes in landscape character.</p> <p>The disparity of the LNR provision within the Black Country.</p> <p>Improving data on the condition of locally designated sites and on biodiversity loss and damage.</p>
Local Environmental Quality	<p>New development can be achieved primarily on previously developed land and there is little need for take up of greenfield land.</p> <p>An extensive network of formal and informal green space.</p>	<p>Addressing the lack of comparable data on this objective, in order to be able to consider spatial options and monitor progress with the BCS.</p> <p>Environmental quality is perceived as poor in much of the Black Country</p> <p>High levels of environmental crime such as fly tipping.</p>
Air, Water and Soil quality	<p>Greatly improved water quality and improving biodiversity in rivers and canals.</p>	<p>There is a lack of comparable data for the Black Country.</p> <p>Improving air quality given road traffic levels in parts of the Black Country.</p> <p>Improving biological quality of water up to national standards.</p>
Climate Change	<p>Black Country is not significantly affected by areas liable to flood.</p>	<p>Lack of comparable data at the Black Country level.</p> <p>Meeting the regional renewable energy generation target of 5% of electricity by 2010 and 10% by 2020.</p> <p>Achieving the reduction of regional CO2 emissions by 18% (2.4 Mt) by 2010 and an additional 16% (1.5Mt) by 2020.</p> <p>Need to reduce vulnerability to climate change, including minimising the percentage of new development on floodplains.</p>
Economy	<p>VAT registrations are stable and increasing at higher rates than the West Midlands average.</p> <p>Business survival rates are improving.</p>	<p>VAT registrations lower than the national average.</p> <p>Need to increase high value, knowledge economy activities.</p> <p>Over dependence on metal manufacturing and the need to develop new skills to address the changing economic structure of the sub-region.</p>
Employment		<p>Less than 20% of workers in the Black Country are employed in sectors with the highest levels of knowledge</p> <p>Unemployment higher than the national average.</p>
Skills		<p>Low skilled workforce in comparison with the national average.</p>

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## 4.4 Limitations of the information and assumptions made

Ideally, there should be baseline information available for a range of indicators across all topic areas, with some historical data to help identify trends. The analysis has shown that the availability of information on the Black Country varies considerably across the different objective topics. A good level of baseline information is evident in respect of the economy and skills area, through the work of the Black Country Observatory. Information on deprivation, crime and health is also available at the sub-regional level. With certain topic areas, however, significant data gaps were identified and these include access to facilities, social care, culture and recreation, environmental quality, air, water and soil quality, and waste, water and minerals. During the course of the SA process some of these data gaps began to be addressed particularly in relation to the environment and more recently waste. However data gaps still represent a significant challenge, as the Draft RSS Phase One Revision: The Black Country cannot be developed effectively without this information.

Where data is not available assumptions have been made using data obtained at the regional or national level. Expert opinion has also been used to help identify trends.

## 4.5 Framework for Sustainability Appraisal

A key tool for appraising and recording SA performance is the SA Framework. This consists of a number of objectives that seek to ask questions of an option, or policy relative to its sustainability.

The development of the SA Framework is set out in detail in Section 2 of Annex A: Revised SA Scoping Report November 2005. It is based on the West Midlands Regional Sustainable Development Framework (RSDF) but has been modified to make it relevant to the Draft RSS Phase One Revision: The Black Country. Essentially this modification reflects the key issues of sustainability that have been identified in the baseline exercise. The Framework comprises 23 objectives and sub-objectives which are set out below

**Table 4.2 Black Country Sustainability Appraisal Framework**

Topic	SA Objective	Sub-objective
<b>Participation</b>	1. To increase the opportunities for the community to participate in and contribute to decisions which affect their quality of life within the Black Country.	Will it increase participation rates in local election? Will it increase participation in community and volunteering activities?
<b>Crime</b>	2. Reduce crime levels, the fear of crime and anti-social behaviour to help people have pride in their communities.	Will it reduce actual crime levels?
<b>Health and social welfare</b>	3. Improved health and well being giving everyone an equal chance to live a long and active life and reduce inequality in access to health and social care	Will it improve people's health and well being? Will it increase opportunities to participate in sport and exercise?
<b>Poverty</b>	4. To reduce poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.	
<b>Education and lifelong learning</b>	5. Improved access to education and lifelong learning for all.	
<b>Access to services</b>	6. Improve accessibility to services for all, close to home and driven by local needs and decisions	
<b>Culture and Recreation</b>	7. Encourage increased cultural and recreational activity across all sections of the community?	
<b>Housing</b>	8. To provide the opportunity for everyone to live in a decent which reflects individual needs preferences and resources	
<b>Natural resources</b>	9. To conserve natural resources including water and minerals so as to meet the needs of present and future generations.	
<b>Transport</b>	10. To reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry/car.	Will it increase the proportion of journeys made by means other than the private car? Will increase the amount of freight transported by rail?
<b>Waste</b>	11. To minimise the growth in waste the waste stream and increase the amount of waste which is re-used, recycled and recovered.	Will it result in an increase in the % of waste recycled? Will it minimise the total growth in waste arisings?
<b>Historic Assets</b>	12. To protect and enhance the value of important historic buildings, landscapes and features of the Black Country	Will it preserve or enhance archaeological sites/remains, buildings of architectural or historic interest, conservation areas, historic parks and gardens and where necessary encourage their conservation and renewal? Will it improve and broaden access to, understanding, and enjoyment of the historic environment? Will it support heritage led regeneration? Will it protect and enhance important historic landscapes?

Topic	SA Objective	Sub-objective
<b>Natural Assets</b>	13. To recognise and enhance the value of important landscape character and local distinctiveness, and Biodiversity through appropriate protection and management	Will it protect and enhance biodiversity? Will it enhance landscape character?
<b>Environmental Quality</b>	14. To enhance the Black Country environment by making it cleaner, more attractive and safer for present and future generations	Will it increase accessibility to quality green spaces?
		Will it improve the connectivity of green spaces, development of 'green corridors' and links to the countryside? Will it increase the proportion of development on previously developed land? Will it improve resident satisfaction with their environment?
<b>Air, Soil and Water Quality</b>	15 Improve air, water and soil quality	Will it improve air quality? Will it improve water quality? Will it improve soil quality?
<b>Climate change and energy</b>	16 To reduce vulnerability and contributions to climate change ensuring that energy is used efficiently and renewable energy is promoted.	Will it reduce the Black Country's vulnerability to flood risk? Will it reduce the Black Country's contribution towards climate change? Will it increase the proportion of energy generated from renewable sources?
<b>Economy</b>	17. To improve and regenerate the Black Country economy by developing a successful and diverse modern economy.	
<b>Job opportunities</b>	18. To increase the number of high quality job opportunities suited to the present and future needs of the local workforce (including unpaid work)	Will it increase opportunities for quality voluntary work? Will it reduce the level of unemployment in the Black Country?
<b>Investment</b>	19. Promote investment in future prosperity	
<b>Skills</b>	20. To ensure that everyone has the skills they need to access the job they want and support long term competitiveness	
<b>Innovation</b>	21. Encourage a culture of enterprise and innovation	
<b>New businesses</b>	22. To increase the development of new technology businesses through making the Black Country an attractive location to start, expand or relocate a business.	
<b>Corporate Social Responsibility</b>	23. To increase the uptake of Corporate Social and Environmental responsibility by organisations within the Black Country.	

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## 5. The Appraisal of Objectives and Options

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### 5.1 Introduction

This section of the report outlines the objectives and options that have been considered in the development of the Draft RSS Phase One Revision: The Black Country. Entec has been engaged with the Black Country Consortium and the SA Steering Group in the on-going development, refinement of the strategic spatial options for the Black Country, this has been undertaken through a series of sustainability appraisals.

The sections below provided a brief summary of the key conclusions of these appraisal exercises.

### 5.2 Draft RSS Phase One Revision: The Black Country Vision and Objectives

The Draft RSS Phase One Revision: The Black Country is a vision-led process, to provide a spatial framework for the Black Country that will inform the RSS review, guide other activities, strategies and policies to 2033. Within the Framework of RSS objectives, the BCS has developed three key objectives for the sub-region, which are set out in the Draft Project Plan Consultation Document (February 2005) and which are reproduced below;

- ***“To reverse out-migration***
  - *Accommodating within the Black Country all of the generated household growth from 2001 onwards;*
  - *Testing scenarios involving higher growth levels (between +5% and +15%).*
- ***To raise income levels***
  - *Raising demand and household incomes (average earnings, GDP per head and reducing unemployment) to the UK average by 2033;*
  - *Testing scenarios to raise levels significantly above the UK average.*
- ***To change the socio-economic mix***
  - *Achieving parity with the national profile of social grade in the population by increasing the proportion of A/B grades from 14.8% to 22% by 2033 and testing the scenario of achieving this by 2021.”*

As part of the Scoping stage, the Draft RSS Phase One Revision: The Black Country objectives were tested for compatibility with each other and with the sustainability objectives (this is an approach that is recommended in the ODPM SA Guidance). The findings of this exercise are set out in Annex A: Revised SA Scoping Report November 2005.

A recommendation of the compatibility assessment was a fourth objective added to address environmental issues.

Following public consultation on the Draft Project Plan a fourth objective was added:-

◆ ***“To transform the environment***

- *to protect and enhance the environment and to create a safe, attractive and healthy place to live and work.”*

This fourth objective was subsequently also tested against the sustainability objectives. The introduction of a fourth objective greatly improves the overall performance of the BCS, helping to counter balance some of the potential conflicts identified elsewhere. The detailed wording which refers to creating “*a safe, attractive and healthy place to work and live*” effectively draws out the compatibility with wider social and economic objectives.

## **5.3 Main alternatives considered**

The main alternatives for the Black Country were developed around the concept of ‘Potential Directions of Change’. These directions were appraised in two separate appraisal exercises in May and September at sustainability workshops. In addition a separate Health Impact study was carried out by Ben Cave Associates.

The findings of these appraisals are reported in Annex B:1<sup>st</sup> Appraisal of Options and Annex C: Sustainability Appraisal of Potential Directions of Change October 2005. The following subsections provide a summary of the options and appraisal conclusions.

### **5.3.1 Spatial Choices**

As part of the preparation of the Draft RSS Phase One Revision: The Black Country a number of spatial choices for the future development of the sub-region were developed. The three choices presented are as follows;

**Option A: Spreads Growth (More of the same pattern of development.)**

**Option B: Focus on corridors and centres**, with two scales of emphasis identified.

- Low Emphasis – Investment focus on existing public transport corridors and canals where they coincide.
- High Emphasis – Additional public transport corridors such as disused railway lines would be brought back into use

**Option C – Growing out from strategic centres**, with two scales of emphasis identified;

- Low Emphasis – consolidate existing centres expanding their “footprint” and increasing densities slightly.
- High Emphasis – planning for growth of existing centres along radial public transport routes and corridors

These options were subject to Sustainability Appraisal in May 2005 and they were subsequently amended as follows and further appraised in October 2005.

The three revised choices are as follows;

**Direction of Change A – An emphasis on growing the four centres**, of Wolverhampton, Walsall, West Bromwich and Brierley Hill to seek to provide the most attractive shopping and leisure facilities and to develop the strongest markets for office development.

**Direction of Change B – An emphasis on growth along the corridors - canals and public transport routes.** This is based upon corridors and could achieve a multiple function focussed around more sustainable travel opportunities.

**Direction of Change C – An emphasis on Planned Dispersal.** Growth is spread across the Black Country, largely maintaining the pattern of mixed land use that exists at present and relying on a market led trend approach.

## 5.4 Comparison of the social, environmental and economic effects of the options

The findings of the 1<sup>st</sup> Appraisal exercise are detailed in Annex B: 1<sup>st</sup> Appraisal of Options July 2005. As a result of this first appraisal report the Sustainability Appraisal Steering Group made several recommendations to the Black Country Consortium as follows;

- (i) *the Spatial Options need to be more detailed to allow a more rigorous appraisal;*
- (ii) *in particular they need to be more geographically clear and time-phased (short-term, medium-term actions etc.), to allow potential effects to be more disaggregated; and*
- (iii) *information also needs to be supplied to Entec in time to allow a rigorous appraisal, and to encourage a better attendance at the second Appraisal Workshop, than there was at the first.*

A second appraisal was then arranged which centred around two workshops held in September 2005. This is detailed in Annex C: Sustainability Appraisal of Potential Directions of Change October 2005. The key recommendations are set out below.

1. **Remove Direction of Change C ‘Planned Dispersal’ from further consideration subject to further consideration of certain elements** - As a result of its poor performance against many sustainability objectives there is considerable justification in excluding this option from further consideration. However, Entec consider that there are some positive benefits surrounding this Direction of Change which should be considered further including, the ability to deliver employment land requirements, the apparent benefits of comparatively less congestion and the emphasis given to the existing smaller centres.
2. **Consider further a hybrid Direction of Change based on a combination of Directions of Change A and B** - Overall Directions of Change A and B perform well against many of the SA objectives and should therefore be considered further paying particular regard to transport implications, the balance of housing and employment and the delivery of environmental improvements. Key elements of Direction of Change C should also be considered.

3. **Further information needs to be provided on the environment in particular the Black Country Urban Park** - This information is considered essential if the implications of the Directions of Change are to be better understood.

## 5.5 How social, environmental and economic issues were considered in choosing the preferred options and developing the draft RSS Policies.

Following the Black Country Study Choices Consultation held between 14 November 2005 and 6 January 2006 draft policies were developed for that part of the RSS relevant to the Black Country. These policies will form Phase 1 of the revision of the Regional Spatial Strategy and will deal specifically with the Black Country. The RSS policies are supported by the Black Country Study – Technical Report, a non-statutory document which provides technical background and justification of the policies.

The underlying strategy basis for the draft policies has emerged as a result of the Choices consultation, previous Sustainability Appraisals and other ongoing technical work. It is broadly based on a combination of Direction of Change A – An emphasis on growing the four centres and Direction of Change B - An emphasis on growth along the corridors.

In developing the RSS policies and the preferred spatial option for the Black Country consideration was given to social, economic and environmental issues and the appraisal of the Potential Directions of Change.

Recognising the overall conclusions of the Sustainability Appraisal of Options the preferred option developed represents a hybrid of Potential Directions of Change A: Centres and B Corridors which performed best against the range of social, environmental and economic objectives.

In terms of addressing social, economic and environmental issues raised by the SA process the table below illustrates how these have been taken on board in the choosing the preferred option and RSS policies.

**Table 5.1 Summary of how key issues have been addressed in the Preferred Option**

	<b>Issues</b>	<b>How addressed in Preferred Option</b>
Social	Development under Directions of Change A and B is concentrated around areas of existing deprivation and therefore offer considerable opportunities for those communities, due to the scale of land use change envisaged. Improving accessibility and transport links to corridors and centres, should benefit those nearest to those areas.	The preferred option focuses on a hybrid approach which combines the centres and corridors options. As such development will be focused around the existing areas of deprivation.
	Strong sense of community within the many centres of the Black Country drawing on the valuable cultural benefits arising from the ethnic diversity of the population. This emerged as a positive benefit of Potential Directions of Change C.	Policy UR1A includes specific reference to supporting “ <i>the network of local centres and communities which exists</i> ”
	The corridor approach is the only one which can deliver the housing requirement of the strategy and is therefore best	By combining the centres and corridors approach in the preferred option it has been

	placed to contribute to the housing objective. In contrast however, it cannot deliver the employment land requirement, particularly in respect of land for logistics. Although the Centres approach is able to deliver the employment land requirement, it is not able to deliver the housing requirement which effects its contribution towards the housing objective.	possible to develop a strategy which could deliver both the housing and employment land requirements.
Environmental	The results of the PRISM modelling of the Potential Direction of Change suggested that the corridors and centres options would lead to the greatest increase in congestion on routes into the centres although it is accepted that the modelling for the corridors was carried out on a two centre approach.	The preferred option gives significant prominence to public transport infrastructure through the inclusion of the two Metro extensions schemes under National and regional Priorities in T12. In addition the strategy develops the idea of the Black Country Express integrated Metro, Rail, Bus and Coach travel in the sub-region.
Economic	Planned dispersal of certain key employment developments, for example logistics, may be beneficial in terms of relating such development close to the motorway network.	This principle is accepted in the Preferred Option although not specifically referenced in policy.
	The current pattern of planned dispersal as set out in Potential Direction of Change A is likely to continue existing social, environmental and economic problems for the Black Country.	Planned dispersal has not been taken forward into the preferred option due to its poor performance against sustainability objectives.

## 5.6 Significant social, environmental and economic effects of the preferred option

The social, environmental and economic effects of the Preferred Option were assessed through two workshop appraisals undertaken on 27<sup>th</sup> February 2006 and 20<sup>th</sup> March 2006. The results of the first appraisal exercise are detailed in Annex D: Sustainability Appraisal of draft RSS Policies March 2006. Following this exercise a number of recommendations were made which are summarised below;

1. **Additional reference to the role of local communities is added to Policy UR1A.**
2. **The importance of complementary strategies to support the preferred option policies is made clear in supporting text.**
3. **Appropriate cross referencing should be made to other environmental policies where they are outside the scope of Phase 1 of the RSS review.**
4. **Additional reference to the environmental priorities for Brierley Hill should be added to Policy PA11A.**
5. **Consideration should be given to the references to strategic cycling/walking routes in Policy T12.**

A further appraisal was undertaken following receipt of further revisions to the RSS policies and an emerging draft of the Black Country Study - Technical Report as set out in Annex E. The key comments from that exercise are set out below in two sub-sections below. The first sub-section considers the revised RSS policies and the second with the Black Country Study –Technical Report itself.

### 5.6.1 Comments on the Revised RSS Policies

Table 5.1 summaries the key findings of the appraisal workshop into the draft revised RSS policies for the Black Country.

**Table 5.2 Summary of Appraisal of Revised RSS policies – 20<sup>th</sup> March 2006.**

Policy	Comment (including response to SA recommendations from 27 <sup>th</sup> February workshop)
General	<p>Entec's recommendation regarding complementary strategies had not been taken on board by the time of the second appraisal, however, it was acknowledged that it was intended to make appropriate cross-references in the text to relevant other strategies such as the skills and education strategy.</p> <p>Entec's recommendation regarding reference to other parts of the RSS covering environmental topics had not been taken on board by the time of the second appraisal.</p>
UR1A	<p>Previous SA recommendation regarding additional reference to communities in the policy had not been taken on board. Entec's view is that Policy UR1A and supporting text could be strengthened by reference to role of communities in delivering the strategy.</p>
PA10	<p>The introduction into policy PA10 of reference to Dudley Town Centre is likely to have positive benefits particularly for Objective 7 (culture and recreation.), Objective 12: (Historic Environment) and also for Objective 17 (Economy) and 18 (job opportunities).</p>
PA11A	<p>The recommendation regarding the environmental priorities relating to Brierley Hill had not been taken on board and Entec remain of the view that this should be included in Policy PA11A.</p>

### 5.6.2 Additional comments on the Black Country Study – Technical Report

An appraisal of the emerging Black Country Study – Technical Report was carried out at the workshop on the 20<sup>th</sup> March 2006. Each of the key themes of the preferred strategy was examined in turn against the broad categories of economic, social and environmental objectives and the overall conclusions drawn are set out below.

It should be noted that the Black Country Study – Technical Report became available shortly before the workshop event and this meant it was more difficult to consider some of the detail within it. The appraisal represents a consideration of the strategic principles of the preferred strategy.

**Table 5.3 Summary of comments on Black Country Study Technical Report**

Theme	Social Effects	Economic Effects	Environmental Effects
Knowledge Economy	<p>Positive effects overall.</p> <p>Potential for employment within the culture and recreation was considered to be under-represented in the strategy and this could provide an area of potential future investment.</p>	<p>The availability of labour force will be a key consideration in relation to the location of businesses, especially for logistics which in some cases can be in more peripheral locations.</p>	<p>Environmental quality in regenerating the economy was emphasised again and it is recognised that this is a key element of the strategy.</p> <p>Positive effect through promoting environmental technology business possibly in a focused location.</p> <p>Key component of successful delivery of regenerated employment land is management and maintenance which is critical in raising the overall environmental quality of the Black Country and encouraging economic activity.</p> <p>Positive effects through bringing historic buildings them back into productive use.</p>
Four Strategic Centres	<p>Brierley Hill as a newly designated strategic centre could be seen as having the least sense of community identity and perhaps the most difficult to engage community involvement. Some concern about the management of the centre as private space which provides no guarantee of access as public space.</p> <p>Brierley Hill such as the Brierley Hill Strategic Partnership and the Brierley Hill Community Forum offer the potential to engage the community in the future development if the centre.</p>	<p>Whilst proportionally more retail growth is going to Brierley Hill this centre is seen as a catalyst for growth within the Black Country and best able to compete and reduce retail leakage to Birmingham.</p> <p>There was considerable potential in the centres for employment based on culture and recreation.</p>	<p>Environmental effects on the four strategic centres are not dealt with in detail although they should be capable of being addressed through Area Action Plans or Masterplans for the centres. In the case of Brierley Hill environmental priorities should be more clearly set out as this is designated as a new strategic centre.</p>
Housing	<p>Effects are generally positive</p> <p>The Study report could also make reference to the housing requirements of other groups, such as the</p>	<p>Effects dependent on the delivery of high quality housing and restricting growth in surrounding counties, so that A/B households are encouraged to locate within the Black Country and not in the surrounding Counties.</p>	<p>Effects on environmental objectives will depend on implementation of Landscape Action Plan. Key consideration will be quality of residential environments and of new and existing green spaces.</p>

	<p>elderly who also have specific needs.</p> <p>Role of complementary health strategy in achieving the strategy could be highlighted.</p>	the Black Country and not in the surrounding Counties.	and of new and existing green spaces.
Urban Park	<p>The potential of environmental transformation to positively effect social objectives is not fully explored under this aspect of the strategy. There are positive effects of environmental improvements and wider healthy living initiatives.</p>	Positive effects on economic objectives	Sustainable design and construction is a fundamental principle which should be an overarching principle rather than one purely relating to this part of the strategy.
Workforce	<p>Positive effects should result from the complementary Skills and Education strategy. Addressing the quality of education is seen as key to delivering the vision for the Black Country.</p> <p>Further clarification is required as to how developer contributions towards education are calculated and secured.</p>	Positive effects on economic objectives	No clear relationship with environmental objectives
Transport	<p>Positive effect on these objectives</p> <p>There is however an issue of the frequency of services in particular in being able to allow workers to access employment sites, 24 Hours a day where this is necessary.</p>	A key strand of the strategy is unlocking access to quality employment land. The strategy refers to highway access improvements to achieve this, however the effects on these objectives would be improved if greater reference to other transport improvements as well.	It is considered that in order to help achieve environmental objectives further reference should be given in this part of the strategy to demand management measures and also the need for travel plans to be agreed in association with new employment or other commercial development.

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## 5.7 Additional Comments on Health Effects

The report on the health and well-being effects associated with the draft RSS Phase One Revision: The Black Country are set out in Annex C: Appraisal of Potential Directions of Change (Appendix D). This clearly sets out the importance of improved health and well-being in developing the urban renaissance strategy for the Black Country.

Health and well being are closely interlinked with the four headline objectives for the Black Country. Maintaining and improving the health and well-being of the population is not solely about the provision of, and access to, health services but also about reducing social exclusion, enhancing access to good quality jobs and housing.

The RSS policies for social, economic and environmental change will affect health and well being. The high levels of social and economic deprivation are directly related to poor health and this is a significant challenge for the Black Country. The urban renaissance policy of the draft RSS (UR1A) has been appraised as having a positive effect on health and wellbeing by virtue of the economic, social and environmental improvements proposed. Given the levels of deprivation within the Black Country, considerable effort will however be required to ensure that economic policies help to reduce inequalities. The RSS should use the economic policies to promote social ties which have a positive influence on social mobility and help people attach themselves to the labour market. Improved health services alone will not deliver the health gain necessary within these deprived communities.

The differing needs of cultural groups also needs to be reflected in the delivering the RSS and it is noted that the Black Country Study – Technical Report does address this issue in respect of housing provision and should be a key component of all elements of the strategy.

Delivering the RSS will require the low levels of social trust to be addressed. Innovative, and effective, methods of encouraging participation will be needed to enable development of appropriate ‘mixed’ communities within housing developments or leisure and tourist related activities.

The wider RSS includes Policy UR4: Social Infrastructure which in respect of health services states that local authorities working with service providers should “*facilitate the modernisation of local health services, informed by partnership working with Primary Care Trusts on local delivery plans and addressing inequalities in health*” This policy provides the foundation for developing specific health service actions relevant to the delivery of the RSS policies for the Black Country.

The Black Country Study – Technical Report offers the opportunity to build on the links between the spatial strategy for the Black Country and wider issues of service provision. The appraisal has recognised the need for a health strategy for the Black Country to complement the RSS and the need to engage the health sector. This should include giving consideration to linkages between the RSS policies and the delivery of health benefits which should result from urban renaissance. This should be taken forward as part of the delivery of the Black Country Vision and the Black Country Study. In line with broader government policy, the delivery of the RSS should promote a context in which the public are able to do what they can to protect their own health and manage their own health and well-being.

## 5.8 Risk and Mitigation Measures

The draft ODPM<sup>5</sup> Guidance states that the appraisal should include “...*recommendations as to how each of the options could be improved.*” This was addressed in the *Sustainability Appraisal of the Black Country Study – Appraisal of Potential Directions of Change October 2005 Entec UK Ltd.*

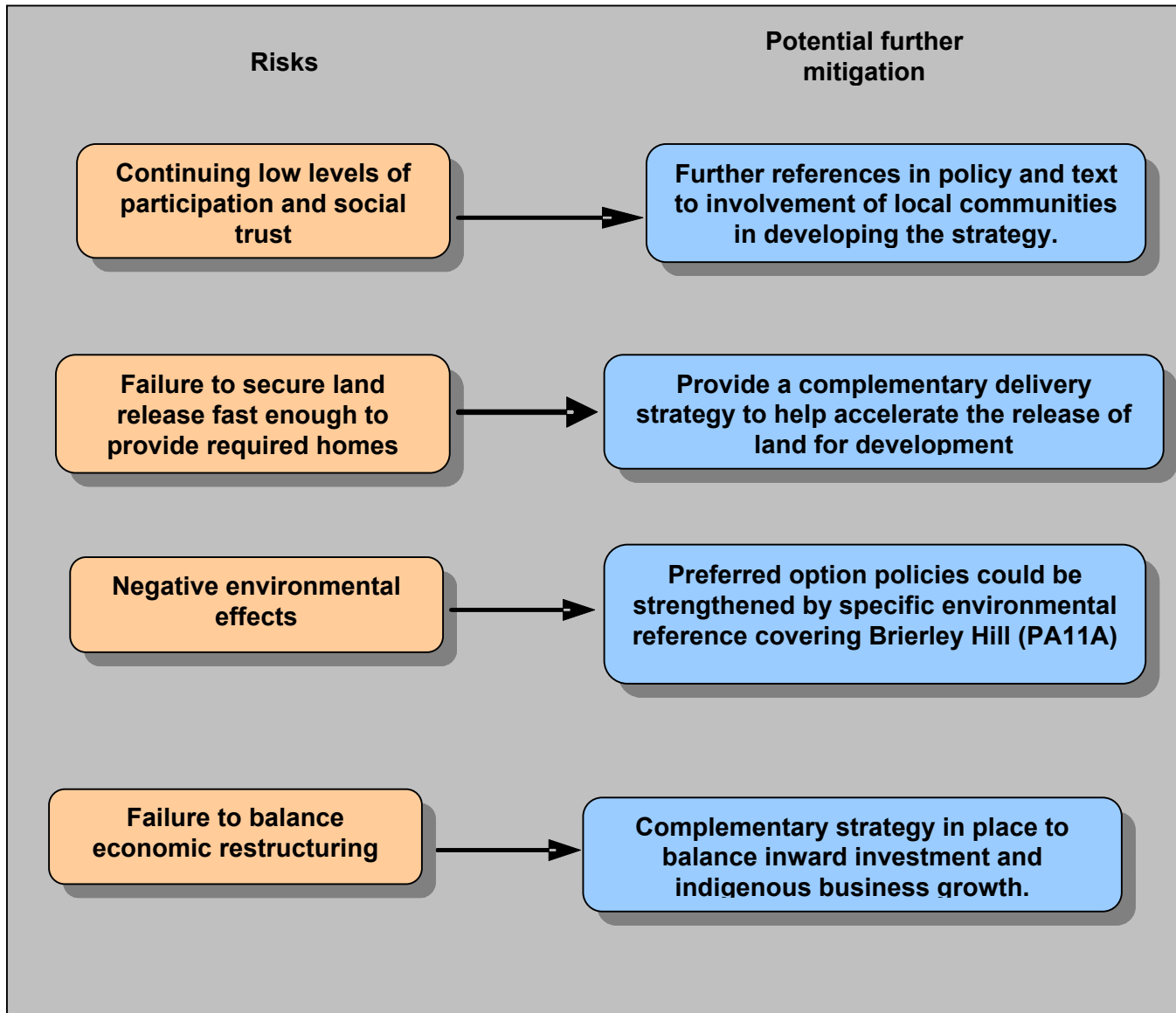
The aspirational nature of the Black Country vision inevitably means that there are inherent risks associated with its delivery and that of the RSS policies which in turn will affect the ability to deliver sustainability objectives. Entec have sought to review these risks as they affect the social, economic and environmental objectives. Potential mitigation measures within the RSS policies and Black Country Study – Technical Report have been identified. The risks have also been broadly categorised in High, Medium and Low.

The figure below shows the key mitigation measures and how they have been addressed in the draft policies. Clearly there may be mitigation measures which could be put in place outside of the remit of the strategy e.g. lower emission fuels, however we concentrate here on those which can be directly influenced through the strategy. Some of the risks shown are inter-related and the mitigation measures themselves may have knock-on effects in terms of creating additional risks. More detail is provided in Annex D.

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<sup>5</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks Consultation Paper September 2004

Fig. 4 Potential further mitigation for the Preferred Option



## 5.9 Further responses to the SA recommendations for the RSS policies

Following the appraisal workshops carried out on the 27<sup>th</sup> February 2006 and 20<sup>th</sup> March 2006 the draft RSS policies were modified again prior to their formal approval by the Regional Planning Partnership. As part of this process the SA recommendations have been considered and a response provided by the Black Country Consortium officers.

This is set out in the table below.

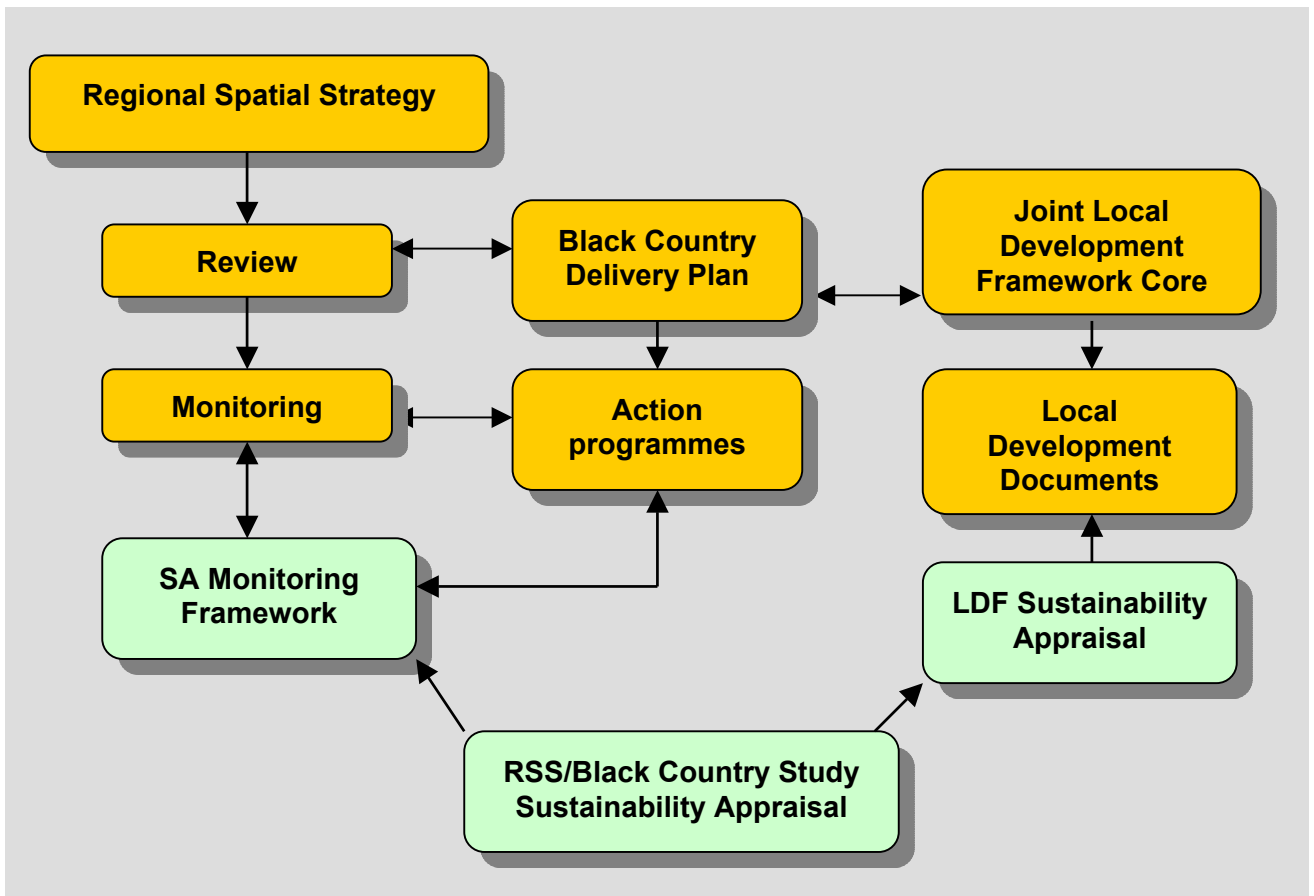
**Table 5.4 Response to SA Recommendations from SA of Draft RSS Policies for the Black Country**

SA Recommendation	Black Country Response
Additional reference the role of local communities is added to Policy URA1.	Policy UR4 of the Regional Spatial Strategy is considered to adequately address this issue.  The focus for involving communities will be at the next level of policy formulation i.e. via Joint Core Strategy between the 4 BC Las where spatial and community strategies combine.
The importance of complementary strategies to support the preferred option policies is made clear in supporting text.	The RSS is essentially spatial. The supporting Black Country Study – Technical Report sets out the seamless links between RSS Policy and now spatial aspiration. The Study ties in the spatial and non-spatial policy areas to satisfy this concern and as recognised by the S.A. Groups in examining the RSS and BC Study together.
Appropriate cross referencing should be made to other environmental policies where they are outside the scope of Phase 1 of the RSS review.	This is now reflected in cross referencing in the proposed RSS Policy text/supporting text climate change is highlighted now in response at 6.12
Additional reference to the environmental priorities for Brierley Hill should be added to Policy PA11A.	Minor but meaningful addition can be made now in PA11 A for BH/Merry hill by adding “Environment Priorities” in bullet point one.
Consideration should be given to the references to strategic cycling/walking routes in Policy T12.	T12 will not include cycling/walking in Regional Policy for the Black Country. However, their importance is now reflected in Policy UR1A (vi) + paras 9.93 and 9.96

## 6. Implementation

### 6.1 Links to other tiers of plans and programmes and project level guidance

Part of the Draft RSS Phase One Revision: The Black Country will be a Delivery Plan which is currently being developed and was not therefore available at the time of the Sustainability Appraisal. This will set out the links with other plans and is illustrated below



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## 6.2 Proposals for monitoring

The SEA Directive imposes a duty to “*monitor the significant environmental effects of the implementation of plans and programmes.*” The ODPM SA Guidance on Sustainability Appraisal of Regional Spatial Strategies and Local development Frameworks provides further guidance on setting up a monitoring system.

Planning Policy Statement 11: Regional Spatial Strategies sets out the monitoring requirements in relation to Regional Spatial Strategies. This is further expanded upon in Regional Spatial Strategy Monitoring: A good practice guide ODPM 2005. An annual monitoring report has to be submitted by the Regional Planning Body to the Secretary of State on the 28th of February of the following year to which it applies.

In line with guidance with guidance in PPS 11 it is suggested that Sustainability Appraisal monitoring is linked to the Annual Monitoring Report and that consideration is given to the objectives, targets and indicators relevant to the SA and the RSS annual monitoring. Appendix 14 of the guidance provides a step by step approach to developing a monitoring system. The Black Country Observatory already carries out a key role in monitoring in the Black Country and it would seem appropriate that SA monitoring is closely linked with this existing work.

The Sustainability Appraisal Framework sets out the basis for monitoring the effects of the RSS through a series of objectives, indicators and targets. It is however recognised that there is gap in baseline information in respect of some objectives.

Proposals for monitoring could be developed from these indicators and this is likely to develop through the Regional Spatial Strategy and Annual Monitoring Report. The table below suggest some indicators and sets out a suggested monitoring framework based on Appendix 14 of the ODPM SA Guidance. Entec have reviewed the available data and indicators set out in the Revised SA Scoping Report and as a result comments are made on where further work on identifying or collating data may be required. Indicators for which data is not currently available at the Black Country level are shown in italics.

Table 6.1 Monitoring Indicators

What needs to be monitored	Potential Indicator	Comment
Community Participation	<p><b>BVPI 6</b> - % turnout in local elections</p> <p><b>Home Office</b> - % participation rates in community and volunteering activities</p> <p><b>BVPI 1</b> Progress on Community Strategies</p>	<p>Limited Black Country level data available.</p> <p>Further data required to assess the effect on this objective.</p>
Crime	<p><b>BCO Headline Indicator</b> - All crimes recorded by the police per 1000 population</p> <p><b>Home Office</b>- Total offences per 1000 population</p> <p><b>Home office</b>- Violent crime per 1000 population</p> <p><b>Home office</b>- Vehicle crime per 1000 population</p> <p><b>Home office</b>-;Burglary per 1000 population</p> <p>% businesses reporting crime</p> <p><i>Sustainable Development Indicators in your Pocket 2005 Fear of crime (a) car theft (b) burglary (c) physical attack.</i></p>	Sufficient data available
Health and Well Being	<p><b>Census</b> :% people describing their health as “good”</p> <p><b>BCO Headline Indicator</b>- Standardised Mortality Rate (SMR)</p> <p><b>BCO Headline Indicator</b> - % limiting long term illness</p> <p><i>Access to healthy food (not available currently across the BC)</i></p> <p><i>Households living in Fuel poverty</i></p> <p>Area of Local Natural Reserve per 1000 population</p> <p>Area of outdoor playing space per 1000 population.</p> <p>Accessible Natural Green Space (an accessible natural greenspace less than 300 metres</p>	Sufficient data available although additional data on Fuel Poverty, access to healthy food, recreational use of greenspaces and sport participation would be beneficial in assessing the effects on this or these?? objectives.

What needs to be monitored	Potential Indicator	Comment
	(5 minutes walk) from home.) <a href="#">BCO Black Country Sports Barometer</a> Indicators <i>Sport England</i> survey of participation levels in sport, (starting Oct 2005) DfES PESSCL (PE & Sports School Club) survey	
Poverty	No. of super output areas in the bottom 10% most deprived in England Indices of Multiple Deprivation <b><i>Sustainable Development Indicators in your Pocket 2005 Children in relative low-income households (a) before housing costs (b) after housing costs, 1990-1 to 2003-4</i></b> <b><i>Sustainable Development Indicators in your Pocket 2005 Pensioners in relative low-income households (a) before housing costs (b) after housing costs, 1990-1 to 2003-4</i></b>	Sufficient data available
Education	<b>BCO Headline Indicator</b> % of 15 year olds gaining 5+ GCSEs A8-C or equivalent <b>BCO Indicator</b> Proportion of adults with poor literacy and numeracy skills <b>BCO Headline Indicator</b> % of working age population qualified to NVQ level 3 or equivalent <b>BCO Indicator</b> % of school leavers staying on to FE/structured training Advanced level points score in the Black Country compared with national average"	Sufficient data available
Access to services	<b><i>Sustainable Development Indicators in your Pocket 2005 ODPM - Access to key services, 1997-8 to 2003-4 (Corner shop/supermarket, post office, doctors/hospital)</i></b>	This is considered a priority area for baseline data as there is currently no baseline information.
Culture and Recreation	<b>BVPI 170c</b> number of school pupil visits to museums and galleries <b>BVPI 117</b> No. of visits to libraries per capita <i>Data on visits to cultural services being compiled by DCMS</i>	Limited data available at the Black Country level. Need to establish appropriate indicators.

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What needs to be monitored	Potential Indicator	Comment
Housing	<b>BCO Indicator</b> - Housing Affordability Index (ave. house price/ave. wage)	Sufficient data available.

What needs to be monitored	Potential Indicator	Comment
Natural Resources	<p><b>Environment Agency</b> Water usage data ML/day</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> Total abstractions from non-tidal surface and ground water, leakage losses and Gross Domestic Product.</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> Domestic water consumption Litres per person per day.</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> Assessments of water availability: Winter surface water/ Summer surface water</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> Construction output and extraction of construction materials.</p>	Lack of data available at the Black Country Level makes this a priority area for action.
Transport	<p>Total number of trips in the Black Country</p> <p>% mode share between car and public transport trips in the Black Country.</p> <p>Average trip length in the Black Country.</p> <p>Change in mode share for trips into the strategic centres of Wolverhampton, Walsall, Merry Hill.</p> <p>Tonnes of freight transported by rail per annum</p>	Sufficient data available
Waste	<p><b>BVPI 82a</b> Recycling rates (%) for household waste</p> <p><b>BVPI 91</b> - percentage of population served by kerbside collection of recyclables</p> <p><b>BVPI 84</b> - No of kilograms of waste collected per head</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b></p> <p>Waste (a) arisings by sector,</p> <p>Waste (b) arisings by disposal,</p>	Sufficient data available

What needs to be monitored	Potential Indicator	Comment
Historic Environment	<b>English Heritage</b> SAMs	Limited data currently available at the Black Country Level particularly on the condition of historic assets. This should be a priority area for action.

What needs to be monitored	Potential Indicator	Comment
Landscape and Biodiversity	<p><b>English Nature-</b> % of SSSIs in favourable or recovering condition</p> <p><i>Biodiversity Action Plan Habitats and species</i></p> <p><i>Condition of LNRs and SNCIs</i></p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> Bird population indices (a) farmland birds (b) woodland birds (c) coastal birds,</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> Bird population indices: wintering wetland birds.</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> Priority species status, /Priority habitat status.</p> <p>% coverage by Landscape Character Assessment.</p> <p>Condition of Landscape Character - Countryside Quality Counts Indicator.</p> <p><a href="http://www.countryside-quality-counts.org.uk">www.countryside-quality-counts.org.uk</a></p> <p>% of culverts removed and watercourses opened up</p>	Further data at the Black Country level particularly regarding the condition of sites needs to be collated.
Local Environmental Quality	<p>% of Black Country which is green space</p> <p><i>English Nature - Accessible Natural Green Space (an accessible natural greenspace less than 300 metres (5 minutes walk) from home.)</i></p> <p><i>Number of active 'friends' groups for open spaces as an indicator of residents satisfaction (Wildlife Trust)</i></p> <p><i>Quality measure of green space</i></p> <p>Indicators under Natural Assets, Historic Assets, Air, Soil and Water Quality, Transport and Climate Change and Energy are also relevant to this objective.</p> <p><b>BVPI</b> Percentage of all housing developments on previously developed land.</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> - Satisfaction in local area - households satisfied with the quality of the places in which they live</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> - Assessment of</p>	Limited data available at the Black Country level. This should be a priority area for action.

What needs to be monitored	Potential Indicator	Comment
	<i>local environmental quality.</i>	
Air, Soil and Water Quality	<p><b>Local Authorities</b> One hour mean for NO2</p> <p><b>Local Authorities:</b> No. and area of Air Quality Management Areas (AQMAs)</p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> NH<sub>3</sub>, NO<sub>x</sub>, PM<sub>10</sub> and SO<sub>2</sub> emissions</p> <p><b>Environment Agency</b> % of main rivers and canals with good or fair chemical and biological water quality</p> <p><i>No. of Pollution Incidents</i></p> <p><i>% of land using sustainable drainage techniques</i></p>	Sufficient data available for air and water quality. Further data relating to soil quality would be beneficial.
Climate Change	<p><u>Indicator for Adaptation</u></p> <p><i>% of development using sustainable drainage techniques</i></p> <p><i>% of development in zone 3 of the flood plain.</i></p> <p><i>Number of planning applications granted against Environment Agency advice</i></p> <p>CO2 emissions per annum</p> <p><a href="http://www.naei.org.uk">www.naei.org.uk</a></p> <p><u>Indicator for Mitigation</u></p> <p><i>% of homes assessed against Code of Sustainable Construction or the Breeam or Ecohomes standard</i></p> <p><i>Uptake of energy efficiency grants</i></p> <p><b>Sustainable Development Indicators in your Pocket 2005 ODPM</b> - Renewable electricity generated as a percentage of total electricity.</p> <p><i>% Of CHP or district heating</i></p>	Limited data available at the Black Country level. Further data collation required for this objective.

What needs to be monitored	Potential Indicator	Comment
	MW production from renewable resources per annum Renewable energy statistics <a href="http://www.restats.org.uk">www.restats.org.uk</a> , <a href="http://www.etsu.com/restats">www.etsu.com/restats</a>	
Economy	<b>BCO Headline Indicator</b> % change in number of local jobs <b>BCO Headline Indicator</b> working age population claiming unemployment benefit <b>BCO Headline Indicator</b> Productivity GVA per head <b>BCO Indicator</b> Business stock by size and knowledge sector <b>BCO Indicator</b> % of total employment by Standard Industrial Classification <b>Regional Visitor Economy Strategy</b> No of visitors and spend	Sufficient data available
Job Opportunities	% increase in Jobs for "Knowledge Workers" <b>BCO Headline Indicator</b> % working age population claiming unemployment benefit	Sufficient data available
Investment	Indicator not identified see <a href="http://www.advantagewm.co.uk">http://www.advantagewm.co.uk</a> + <a href="http://www.bci-uk.com/">http://www.bci-uk.com/</a> <i>Sustainable Development Indicators in your Pocket 2005 ODPM (a) Total investment (b) social investment relative to GDP.</i>	No data available. Need to agree indicators and collate data.
Skills	<b>BCO Indicator</b> % of establishments reporting skills gap <b>Regional Economic Strategy Indicator</b> -Investment in training by employers % of companies with liP	Sufficient data available
Innovation	Indicator not identified see <a href="http://www.thebic.co.uk/">http://www.thebic.co.uk/</a> + <a href="http://www.bcks.org.uk/">http://www.bcks.org.uk/</a>	No data available. Need to agree indicators and collate data.

What needs to be monitored	Potential Indicator	Comment
New Technology	<p><b>BCO Headline Indicator</b> No. of VAT registered businesses per 10,000 population and sector</p> <p><b>BCO Indicator</b> One and three year survival rates for VAT registered businesses</p> <p>% residential population in self employment</p>	Limited relevant data available. Need to agree indicators and collate data.
Corporate Social Responsibility	<p>% of companies with ISO14001 registration</p> <p>No of social and community enterprises see <a href="http://www.socialeconomy.org/default.php?id=19">http://www.socialeconomy.org/default.php?id=19</a></p>	Sufficient data available

The monitoring of performance is not an end in itself. Instead its role is to identify areas of under and over-performance and where appropriate activate remedial action. The following table provides a format against which the information can be collected, recorded and ultimately acted upon.

**Table 6.2 Documenting the Monitoring Data (example format)**

What needs to be monitored	Potential Indicator	Source of information	Are there any gaps in existing information and how can these be resolved?	When should remedial action be taken?	What remedial action could be taken?
Housing	Non-decent dwellings as a % of total dwellings				

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## 7. Conclusion

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Entec UK in conjunction with Ben Cave Associates Ltd was commissioned to undertake an SA of the Draft Phase One Revision of the West Midlands Regional Spatial Strategy – The Black Country.

The method and approach undertaken in the assessment of the options follows closely current SEA and SA guidance. The principle that underlies the approach has been one of regular appraisal and feedback between the consultants, regional stakeholders and the policy team. A Sustainability Appraisal Steering Group chaired by Professor John Glasson of Oxford Brookes University has overseen the process.

The SA process has run in parallel to the development of the Draft RSS policies and has influenced its preparation. The appraisal process has been informed by the collection of a substantial range of baseline information which was first reported within the scoping report of March 2005 and subsequently amended in the Revised SA Scoping Report November 2005 (Annex A). This baseline is reproduced in full within the accompanying Annex A. An identification of the baseline is an essential step to identify the key social, economic and environmental issues that face the sub-region. It is only with an understanding of the issues that options and ultimately policies can be developed.

There are a number of significant issues that face the sub region. These include economic performance, health, deprivation and environmental quality that is below national and regional averages.

In order to improve the social, economic and environmental performance of the Black Country Strategic spatial options for the sub region were developed by the policy team based on the concept of “Potential Directions of Change”. Three Potential Directions of Change were appraised within SA workshops and the findings and recommendations, relative to their sustainability performance, collated. The recommendations were used by the Black Country Consortium to refine the final over-arching option for the draft RSS.

Two versions of the Draft RSS policies that could provide the final option have been appraised for their sustainability together with an appraisal of the emerging Black Country Study Technical Report. This latter report provides the reasons that underpins the draft RSS policies and describes the nature of Black Country change

Recommendations which were made following the appraisal of the Draft RSS have been considered and these have influenced the Final Draft. It is considered that overall the document should move the sub-region towards sustainability, however uncertainties and risks do remain. These uncertainties and risks relate to delivering the scale of redevelopment of former employment land to achieve the housing requirements and transforming the environment so that it encourages investment into the sub-region and enables it to attract and retain knowledge workers and a knowledge-based economy.

A key challenge for the RSS and partner strategies will be to ensure that a successful delivery plan is developed which enables the wide scale regeneration of the Black Country to be delivered.

### 7.1.1 Influence of the SA on the RSS Phase 1 Revision: The Black Country

The SA process has had a significant influence on the development of the RSS for the Black Country. The table below summarises these key influences in relation to the stages of RSS preparation.

**Table 7.1 Summary of SA influence on the RSS**

SA Stage	SA comment	Influence on RSS
Scoping	SA compatibility testing highlighted the need for a fourth objective to be added to the BCS objectives to deal with the environment.	Fourth objective relating to the environment included in the RSS Project Plan.
	SA scoping stage highlighted data gaps at the Black Country level notably relating to the environment, culture and leisure activity. Priority areas for further data collation were recommended.	Development of Environment technical report to address some of these issues.
Developing and refining options	1 <sup>st</sup> iteration of options appraisal recommended refinements to the options to make them easier to appraise.	Options refined as Potential Direction of Change with greater detail and clarity.
Options Appraisal	Recommended that a combination of Potential Directions of Change A Centres and B Corridors was most sustainable option. Potential Direction of Change C was least sustainable but had some positive features.	Preferred option developed based on combination of centres and corridors approach incorporating some positive elements of planned dispersal option.
Preferred Option Appraisal	SA confirmed overall sustainability benefits of preferred option. A number of recommendations regarding potential improvements to policy/text wording.	The majority of the recommendations have been taken on board although some limited concern remains regarding the level of detail provided in Policy PA11A in respect of environmental priorities at Brierley Hill.