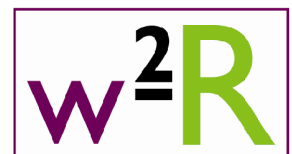


PSS Appendix 7

Sustainability Statement



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SUSTAINABILITY STATEMENT



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1. BACKGROUND

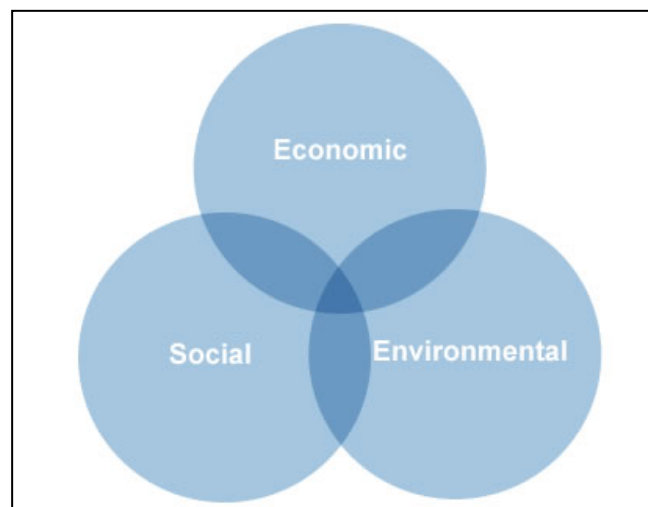
An application has been prepared for planning permission for an energy from waste facility at Four Ashes Industrial Estate, South Staffordshire. This Statement is completed to ensure that sustainability issues are addressed comprehensively and incorporated into subsequent decision making regarding the proposal for an Energy from Waste (EfW) facility at the Four Ashes site.

Sustainability appraisals are being carried out at other tiers of land use planning (including the Regional Spatial Strategy and Local Plans). This process helps to ensure that the concept of Sustainable Development (SD) is integrated into the development process at all levels.

1.1 What is Sustainability?

The terms 'Sustainable Development' (SD) and 'Sustainability' are often used interchangeably when, in fact, they mean very different things. The general points behind the definition of both terms are usefully presented via a Venn diagram as shown in Figure 1.

Figure 1 Venn Diagram Demonstrating Sustainable Development and Sustainability



Each lobe of the Venn diagram demonstrates a particular aspect of sustainable development (environmental, social and economic) the point where they all overlap – or balance – is the point of sustainability. The fundamental idea is that progress in one aspect does not cause detriment to another so the environmental, social and economic impacts become balanced. This balance is also important when considering progress between and within generations, to ensure benefits to one generation or social grouping does not lead to the detriment of others (this is referred to as inter- and intra- generational equity). The most commonly cited definition of SD focuses on this aspect and states that it is:

“Development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs” (WCED, 1987:43)

This is a rather abstract statement and can be difficult to understand how to bring into reality. The description of sustainability is more straightforward: *a sustainable system is one that survives or persists.*

Both definitions present the principles behind the terms but it is up to individual organisations to define what they mean to them practically.

1.2 West Midlands Sustainability Objectives

“A Sustainable Future for the West Midlands Regional Sustainable Development Framework” (refreshed draft, January 2008) provides a framework for people to develop, review and implement strategies, policies and plans to ensure their work contributes towards a sustainable future for the region. The document provides a vision for the West Midlands in terms of sustainability, which is:

“Our vision for a sustainable West Midlands is one of an economically successful, outward looking and adaptable region, rich in culture and environment, where everyone, working together, is able to enjoy well-being and quality of life, meeting their aspirations and needs without prejudicing the ability of others, now or in the future, to do the same.”

To realise this vision a number of working principles have been identified to be met (West Midlands Sustainable Development Framework, 2008). These principles are set out below:

“Putting people and communities at the centre of strategy development and policy decisions; engaging people in the decisions that affect their lives and their communities, promoting personal wellbeing, social cohesion and inclusion, creating equal opportunity for all, and meeting the varied needs of our diverse communities in terms of gender, age, ethnicity, disability, faith, sexuality and background and in the various rural and urban communities in the West Midlands region.

Valuing the environment and living within environmental limits, respecting the limits of the earth’s ability to provide resources and reabsorb pollutants in order to avoid serious or irreversible damage, and recognising the importance of the environment and biodiversity to well-being, health and economic vitality.

Gathering and using sound evidence as the basis for policy-making, taking account of the whole-life costs and benefits of our decisions and activities, including impacts that can’t easily be valued in money terms, and taking account of long-term impacts in the wider social, environmental and economic context, and adopting the “precautionary principle”, that is, where there is a possibility that an action might result in damage to human health or the environment, the action should be avoided or measures identified to prevent or limit damage and degradation.

Taking account of the national and global implications of our activities, as well as those within the Region, and wherever possible adopting the “polluter pays” principle, that those responsible for environmental or social degradation should meet the costs of the consequences.”

A policy review is included within the planning support statement in relation to sustainability, a few notable points in terms of sustainability are summarised below.

1.3 Policy Summary

1.3.1 International Sustainability Guidance

Agenda 21 – This is a comprehensive plan of action to be taken globally, nationally and locally by organisations within the United Nations System, Governments, and Major Groups in every area in which human activities impact the environment. Relevant to this study, Agenda 21 examines the social and economic dimensions of sustainable development with regards to the adverse social and economic issues and outcomes of unsustainable development and resource use. It specifically covers issues such as poverty, changing consumption patterns, demographics, human health, human settlements and integrated cooperation to accelerate sustainable development. The conservation and management of resources is another key area examined in Agenda 21, specifically with regards to the protection of the atmosphere, land resources, waste and biological diversity.

1.3.2 National Sustainability Guidance

Planning Policy Statement (PPS) 1: Delivering Sustainable Development (2005)

- Sustainable development is the core principle underpinning planning and is based around the idea of ensuring a better quality of life for everyone. PPS1 expresses a Government priority to develop “*strong, vibrant and sustainable communities and to promote community cohesion in both urban and rural areas*” (para. 14). PPS1 also emphasises the need for good design to ensure attractive, usable, durable and adaptable places as well as the need for community involvement in the design process as key elements in achieving sustainable development.

Securing the Future (2005) - The UK Government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration have agreed upon a set of shared guiding principles that provide a basis for sustainable development policy in the UK. There are four priority areas for immediate action these are:

- ◆ Sustainable Consumption and Production;
- ◆ Climate Change and Energy;
- ◆ Natural Resource Protection and Environmental Enhancement; and
- ◆ Sustainable Communities.

These priority areas are reflected in the regional and local sustainability guidance.

Planning Policy Statement (PPS) 10: Planning for Sustainable Waste Management (July 2005)

- The overall objective of Government policy on waste is to “*protect human health and the environment by producing less waste and by using it as a resource wherever possible*” (para.1). PPS10 advocates that sustainable waste management is the key, and by “*moving the management of waste up the ‘waste hierarchy’ of reduction, reuse, recycling and composting, using waste as a source of energy, and only disposing as a last resort*” (para.1), the Government aims to create a balance between economic growth and the environmental impact of waste. Emphasis is placed on the need for positive planning to achieve sustainable waste management (para.2) “*...by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right*

time". In identifying potential sites for waste management facilities, PPS10 identifies existing industrial sites as a viable option and recommends that opportunities to co-locate facilities together, and with complementary activities, should be considered. PPS10 also advocates that proposed waste developments should be assessed against the capacity of existing and potential transport infrastructure to support the operation of the facility.

1.3.3 Regional Sustainability Guidance

Regional Sustainable Development Framework for the West Midlands (refreshed draft January 2008) – This document has been used to provide the framework for the sustainability assessment of the proposed facility.

Regional Spatial Strategy for the West Midlands (June 2004) - The overall aim of the strategy is to work towards the government's sustainable development objectives of social progress which recognises the needs of everyone, effective protection of the environment, prudent use of natural resources and maintenance of high and stable levels of economic growth and employment. The RSS vision has also fed into the SD framework and assessment undertaken within this sustainability statement.

1.3.4 Local Sustainability Guidance

A Sustainable Development Strategy for South Staffordshire District Council (Revised February 2002) - This strategy sets out how South Staffordshire District Council are going to promote and work towards the goal of sustainable development. It puts emphasis on a number of key areas that are deemed to require improvements and sets out what the Council are currently doing and what actions they will take to encourage sustainable development. Waste Management is one of the key areas along with the built environment, climate change, contaminated land, home energy, natural environment and biodiversity, pollution and sustainable transport. With regards to waste management, the strategy acknowledges that, in the past, South Staffordshire sent all the residual waste collected to landfill which presented a serious nuisance problem to local residents and also contributes to the "*global problem of climate change*".

Sustainability Appraisal of the South Staffordshire Local Development Framework (2006) – Sustainability issues have been explored using the West Midlands Sustainable Development Framework. The key sustainability issues facing the district are reflected in the sustainability assessment completed as part of this Statement.

2. METHODOLOGY

The assessment has been completed using the “Checklist West Midlands”. This is the tool designed to assess sustainable developments in the West Midlands (available from: <http://www.checklistwestmidlands.co.uk/>). The tool identifies a range of different economic, social and environmental sustainability issues covered in National Guidance and the West Midlands Regional Spatial Strategy. The Checklist has been developed by West Midlands Regional Assembly and Advantage West Midlands with the help of the Building Research Establishment, and support of the Department of Local Communities and Local Government, the World Wildlife Fund (WWF), West Midlands Building Technology Cluster, West Midlands Regional Planning Officers Group, and Sustainability West Midlands.

The assessment has been designed for new housing and mixed use developments and so has been adapted to suit this particular proposal.

The West Midlands Checklist is intended for use at the design and planning application stages of a new development. It focuses on the sustainability issues pertinent to spatial planning, although it does address those construction and “in-use” issues that can be anticipated or influenced at the design phase. The Checklist assumes that the sustainability of sites being brought forward for development in Local Plans has been subject to Sustainability Appraisal / Strategic Environmental Assessment and has been tested at Examination in Public. As a result in the original checklist there is less focus on the location of the site. Therefore, the tool has been amended to include some focus on location aspects of the site (as a SA/SEA has not been conducted on the Local Plan to date).

Any questions that are not relevant to the particular proposal have been marked as “not applicable” with a brief explanation why, where appropriate.

Each of the issues has been assessed whether the project’s impact is positive or negative, using the following rankings:

++ = significant beneficial/desirable effect;

+ = marginal beneficial/desirable effect;

- = marginal negative/undesirable effect;

-- = significant negative/undesirable effect;

↔ = could go either way/uncertainty;

0 = no impact anticipated;

N/A = Not applicable to this development.

The assessment has been completed on the basis that the mitigation measures described in the associated environmental statement have been implemented.



SUSTAINABILITY STATEMENT

3. SUSTAINABILITY ASSESSMENT

	Ranking	Explanation
Climate Change and Energy		
<i>Flooding</i>		
To ensure that sites and developments take due account of flood risk, and where it is present, take appropriate measures.	0	The site location does not have a high risk of flooding. An adjacent piece of land does have a flood risk category; therefore a flood risk assessment was completed as a precautionary measure, it re-iterated that there was not a notable impact onsite.
To reduce the risk of flooding on proposed development sites and adjacent areas of land	0	A drainage strategy (SUDS) has been produced as part of the application. The use of a green roof and drainage ponds and storage will work to ensure flooding risk is minimised.
<i>Cooling</i>		
To reduce the impact of mechanical ventilation and cooling devices.	0	The design of the facility has ensured that ventilation and cooling devices are placed away from sensitive receptors. They are not considered to provide an impact (particularly given the location of the proposed facility). The opportunity for combined heat and power is being investigated and all commercial opportunities to maximise the thermal efficiency of the operation will be explored and implemented if commercially viable.
<i>Heat island</i>		
To reduce the heat island effect inherent to urban areas through passive design measures. On warm summer days, the air in urban areas can be 6-8°F hotter than surrounding areas. Scientists call these areas "urban heat islands." This is due to building materials (particularly darker materials such as tarmac, and heavier materials such as concrete) absorbing and radiating heat.	NA	Not applicable because the development is not situated within an urban area; therefore, this issue has been discounted from this assessment
<i>Water efficiency</i>		
To reduce the overall consumption of clean water for non-potable uses and to manage the run off of rain water from the site.	0	Runoff from the site will be controlled so that peak runoff will not exceed that expected from a greenfield site. Use of water for non-potable uses will be minimised.
<i>Sustainable energy</i>		



SUSTAINABILITY STATEMENT

	Ranking	Explanation
To increase the overall efficiency of the development through energy efficient design and management	+	A design and access statement has been submitted associated with this development. It demonstrates how energy efficiency and management are central to the decisions made associated with this development.
To promote the increased use of renewable energy sources to reduce dependence on fossil fuels producing CO2 emissions.	++	The development will produce energy for export and therefore presents a good opportunity to reduce dependence on fossil fuels.
To increase the use of sustainable heating techniques.	++	The use of CHP and the possibility of placing PV cells on the building increases the use of sustainable heating techniques
To encourage the integration of renewable energy technologies during the design stage.	++	Renewable energy technologies are central to the proposal and have been integrated since initiation.

Site infrastructure

To provide easy access to site service and communications infrastructure, with minimal requirement disruption and need for reconstruction, and allowing for future growth in services.	NA	Not applicable as it is not a housing or mixed-use development Please note: The services to the site and immediate access will be provided concurrently with the development of the adjoining site for small industrial units minimising disruption to adjoining businesses on the site.
To ensure that the masterplan considers the site wide distribution of on-site produced renewable energy.	++	The site will export in excess of 24MW of electricity and could provide hot water and steam to adjoining industrial users and Institutions.
To evolve an energy management scheme and provide the public with easy access to renewable energy information.	++	The site includes an education facility that will be available for general public use to educate on waste arisings and energy use.

Community

Promoting community networks and interaction

Involvement in decision making

To promote community involvement in the design of the development to ensure their needs, ideas and knowledge are taken into account to improve the quality and acceptability of the development.	++	The community statement associated with the application lists the comments that have been made by stakeholders and how these have impacted on the design process. There has been detailed community involvement throughout the project preparation.
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Supporting public services, social economy and community structure



SUSTAINABILITY STATEMENT

	Ranking	Explanation
To encourage sustainable lifestyles and help integration into the local community.	+	The education centre will be used to highlight how the general public's approach to waste arisings has a direct impact on their local environment.
<i>Community management of the development</i>		
To ensure that community facilities are maintained and the community has sense of ownership.	+	The facility is dealing with municipal waste and therefore has a direct relationship to the community. Continuing community engagement is designed to ensure transparency and understanding for the project is maintained (as far as possible). The plant will revert to the County Council at the end of the contract in a condition that will allow it to continue to be used for many years.
Place making		
<i>Efficient use of land</i>		
To ensure the most effective and efficient use of land, applying a sequential approach.	++	The site is allocated for employment purposes and the proposed development conforms with the allocation and will have the potential to supply adjoining uses with heat and power.
To ensure the efficient and sensitive use of appropriate land.	+	The design of the facility has ensured that sensitivities have been taken into account (e.g. avoiding impact on nearby woodland areas)
To ensure effective re-use of apt buildings to restore and strengthen the areas character (rural or urban).	NA	No existing buildings on site
<i>Design process</i>		
To ensure that the preparation of a statement of design intent, that is informed by studies of the site and its surroundings, is discussed with the appropriate parties prior to finalisation.	+	A number of photomontages and a landscape visual assessment were completed on the proposed development. A design and access statement was also completed and design decisions have been discussed with a number of statutory consultees including CABE.
To ensure that the landscaping scheme is attractive and appropriate to the local environment.	+	The landscaping scheme has been chosen to complement the existing habitat and an ecologist has provided input as appropriate to ensure suitable mitigating areas are available.
To ensure that the character of the landscape is respected and, whenever and wherever possible, enhanced through appropriate location and design.	+	The design of the facility (as detailed in the design and access statement) has been completed to ensure it respects the current character of the existing landscape.
<i>Form of development</i>		



SUSTAINABILITY STATEMENT

	Ranking	Explanation
To achieve visual and physical connectivity that makes it easy to find the development and to navigate around.	++	The on-site access has been designed to enable visitors and deliveries to be kept separate to reduce confusion.
To make pedestrian movement attractive and safe, reducing reliance upon private cars for local journeys.	NA	This point is not relevant to a waste facility
To create a place with a clear identity that is easy to understand and navigate.	++	The on-site access has been designed to enable visitors and deliveries to be kept separate to reduce confusion.
To ensure that building frontages encourage pedestrian usage of streets contributing to vitality.	NA	Not residential development
To create defensible spaces that clearly define public and private spaces.	NA	Not residential development
To ensure that the development responds to local character whilst reinforcing its own identity.	++	The design of the facility has been produced to ensure it can complement the surroundings and look to minimise the impact of such a large structure. The separate flue structure has been designed to give it a distinctive look.

Open space

To ensure access to high quality public green space for all.	NA	Not residential development
To promote outdoor recreation, health and community interaction.	NA	Not residential development

Adaptability

To ensure that new commercial or light industrial buildings can be adapted to the demands of new uses.	NA	Not commercial or light industrial buildings
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Inclusive communities

To prevent social inequalities and foster a socially inclusive community.	NA	Not relevant to this development type
To attract a diverse new community that reflects the surrounding demographic needs.	NA	Not relevant to this development type

Crime



SUSTAINABILITY STATEMENT

	Ranking	Explanation
To apply design principles to increase the security of the development.	++	The police architectural liaison officer was consulted and security lighting along with boundary treatment was put in place to increase the site's security.
<i>Street lighting/light pollution</i>		
To ensure that street lighting is as energy efficient as possible and to minimise light spillage.	+	The lighting on site will be used at low level with an aim to light the site rather than surrounding areas.
<i>Security lighting</i>		
To ensure that the security lighting is a carefully designed element, installed with due consideration of its suitability for the task and its effect on neighbours and the environment.	+	Security lighting has been carefully considered to minimize disruption to neighbours and the environment.
Buildings		
<i>EcoHomes/BREEAM or Code for Sustainable Homes</i>		
To ensure individual buildings underpin the sustainability of the development.	++	Decisions on the location, feasibility and design of the proposed development have focused on considering the environmental, social and economic implications of any facility and ensuring decisions are based on an appropriate balance of the three. The building will be required to meet BREEAM, Secured by Design and other standards.
Transport and Movement		
<i>General policy</i>		
To encourage and enable the use of public transport.	+	The nature of the proposal means the main traffic associated with the site is HGVs. The nature of the site means it is isolated from residential properties and public transport so there is limited opportunity for employees to use public transport. The use of 'transfer stations' will enable the tonne/km associated with the deliver of waste to be minimised.
To promote the use of virtual communications as an alternative to transport where possible.	NA	Not applicable to this development
<i>Public transport</i>		



SUSTAINABILITY STATEMENT

	Ranking	Explanation
To ensure the availability of frequent and convenient public transport links to train, tram or bus.	NA	Not applicable to this development
To encourage more frequent use of public transport during the entire year, by having waiting areas which are considered safe and out of the weather.	NA	Not applicable to this development

Parking

To reduce levels of car parking available as an incentive to use public transport and other methods of mobility and communication.	NA	Not applicable to this development
To provide flexible space which can accommodate other uses outside the areas of peak parking demand.	NA	Not applicable to this development
To reduce the impact of heavy goods vehicles loading on public highways.	++	Road improvements are being undertaken on Vicarage Road and the junction of the A5 and Vicarage Road to help reduce impact from HGVs. The site is located as near to the Strategic Highway Network as possible to reduce the impact on the local community and the use of 'transfer stations' will enable the tonne/km associated with the delivery of waste to be minimised.

Pedestrians and cyclists

To promote cycling as a real alternative to the use of private cars for shorter journeys, whilst reducing the risk of traffic accidents and the fear of crime.	+	Areas for cycles to be stored under cover and the provision of showers and changing facilities have been factored into the design of the building.
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Proximity of local amenities

To reduce the requirement to travel by car to essential facilities by having facilities accessible by other means.	NA	Not applicable to this development because it is a workplace
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Traffic management

To ensure vehicle speeds are appropriate to all road users.	+	On-site limits will be in place and the site is located as near to the Strategic Highway Network as possible to reduce the impact on the local community.
To enable residents to use and enjoy space around homes whilst maintaining vehicular access.	NA	Not applicable to this development



SUSTAINABILITY STATEMENT

	Ranking	Explanation
<i>Car club</i>		
To reduce residents dependency on private car ownership and use.	0	Bidders will be encouraged to demonstrate how they will promote lift share etc. during the bidding process. However as this impact is concerned with 'residents' it is assumed that the proposed development will not impact on this issue
Ecology		
<i>Conservation</i>		
To determine the ecological value of the habitats in and around the site in order to maintain and enhance biodiversity and protect existing natural habitats.	+	Ecological surveys have been completed on-site and around the area. A number of mitigation measures have been input to reduce the impact on biological diversity from the proposed development.
<i>Enhancement of ecology</i>		
To improve the ecological value of the site and existing habitats.	+	As part of the mitigation programme there are plans to improve nearby woodland to improve the ecological value. Also, drainage ponds etc installed on site will improve it from its current state as disused land.
To improve the ecological value of the site and support the viability of species by linking populations and habitats.	+	Every effort has been made to ensure there is no fragmentation of habitats or species.
<i>Planting</i>		
To ensure that the trees and shrubs that are specified contribute to the ecological value of the site.	++	An ecologist was used to ensure the planting schedule was in keeping.
Resources		
<i>Appropriate use of land resources</i>		
To ensure that heritage or archaeologically important features are conserved or preserved if present.	0	Full investigation was undertaken and found not be an issue on-site
<i>Environmental impact</i>		



SUSTAINABILITY STATEMENT

	Ranking	Explanation
To increase the volume of low environmental impact materials used during the construction of developments.	0	The material asset chapter and development description details the use of materials proposed for construction. Where possible low environmental impact materials have been used whilst ensuring the structural performance and technical capability of the proposed development is maintained.
<i>Locally reclaimed materials</i>		
To increase the proportion of locally reclaimed or recycled materials in used in the construction of roads, pavement, public spaces and carparks. Locally within this context describes materials sourced from within a 35 mile radius	+	This will be an issue addressed during the procurement of the site.
To increase the proportion of locally sourced materials used in the construction process.	+	Again, this will be a stipulation made clear during the procurement process
<i>Water resource planning</i>		
To develop a sustainable water efficiency strategy that does not impact upon the critical levels required for agricultural purposes during peak demand period of summer months.	0	SUDS has been undertaken for the purposes of the development (sustainable urban drainage system) that aims to ensure drainage from the site does not exceed that if it was a greenfield area (thereby ensuring agricultural demands can be maintained.
To ensure that any development on site does not adversely impact upon local public or private water supply through polluting aquifers or groundwater.	0	This is only an issue during the construction phase of the development and every effort is being taken to ensure this will not happen through the use of particular construction techniques – detailed in the development description within the ES.
<i>Water efficiency in use</i>		
To ensure that measures are incorporated into dwellings to increase water efficiency in use water efficiency in use.	NA	Not applicable to this development
<i>Refuse recycling</i>		
To promote increased levels of recycling.	+	The needs investigation into the requirement for the site has centred on the council's waste strategy to increasing recycling and composting throughout the county to a minimum of 55%. This proposed development will enable the Council to adhere to its target of Zero Waste to Landfill.



SUSTAINABILITY STATEMENT

	Ranking	Explanation
<i>Noise pollution</i>		
To reduce the impact of noise upon the development.	0	The noise assessment was completed and included in the ES and has ensured that any sensitive locations will not be affected by increased noise from the proposed development.
<i>Construction waste</i>		
To minimise the waste produced from the development going to landfill.	+	The construction techniques are designed to minimise the waste going to landfill – in keeping with Staffordshire’s ‘Zero Waste to Landfill’ strategy
Business		
<i>Competitive business</i>		
That new business space should complement and enhance those businesses already in the local area.	+	The site is allocated for employment and could supply heat and power to the adjoining industry and therefore the proposed development will fit well within the area.
To promote business growth within regionally prioritised sectors.	+	The proposed development is within an area designated for employment use and the policy review has demonstrated that it is a suitable development for the area.
To attract inward investment from businesses and organisations from outside the immediate area to increase economic well being.	NA	Not applicable to a development of this type
<i>Business opportunities</i>		
To improve the connectivity and communication between different businesses to enhance viability.	NA	Not applicable to a development of this type
<i>Employment</i>		
To create additional permanent jobs within the local area.	++	40 new jobs will be created by the proposed development
To ensure that the development contributes to regeneration initiatives.	NA	Not applicable to this development because it is not a residential development
<i>Business types</i>		



SUSTAINABILITY STATEMENT

	Ranking	Explanation
To provide space for all business types, both start up or expanding, to maintain a diverse and flexible business sector within the area, and provide for facilities for future growth.	NA	No applicable to this development

4. CONCLUSION

In terms of the sustainability of the proposed development by undertaking the sustainability checklist (as devised for the West Midlands) it has shown no negative impacts associated with the development. This assessment has been completed based on the assumption that the mitigation measures listed in the associated environmental statement will be undertaken. The areas that the proposed development shows the greatest benefit in terms of sustainability are:

- ◆ The promotion of increased use of renewable energy sources and increase in the use of sustainable heating techniques;
- ◆ Site-wide distribution of energy has been considered;
- ◆ The proposed development includes an education centre that can enable easy access to energy information for the public;
- ◆ Community needs were integrated in the design process;
- ◆ Effective and efficient use of land has been achieved with the site's design and created a place with clear identity that is easy to navigate;
- ◆ The development responds to the local character whilst reinforcing its own identity (with its distinctive design);
- ◆ The security of the development has been carefully considered;
- ◆ It will reduce the impact of heavy goods vehicles through associated road improvements;
- ◆ Landscaping contributes to the ecological value of the site; and
- ◆ It has created permanent, additional jobs in the region.