

# Sustainability Appraisal of the Black Country Plan

## **Regulation 18 (II) SA Report**

June 2022



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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## Regulation 18 (II) SA Report

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# Acronyms & Abbreviations

<b>A&amp;E</b>	Accident and Emergency
<b>AHHTV</b>	Area of High Historic Townscape Value
<b>ALC</b>	Agricultural Land Classification
<b>AONB</b>	Area of Outstanding Natural Beauty
<b>AOS</b>	Area of Search
<b>APA</b>	Archaeological Priority Area
<b>AQMA</b>	Air Quality Management Area
<b>BCA</b>	Black Country Authorities
<b>BCP</b>	Black Country Plan
<b>BMV</b>	Best and most versatile
<b>CA</b>	Conservation Area
<b>CaBA</b>	Catchment Based Approach
<b>CF</b>	Carried Forward
<b>DBEIS</b>	Department for Business, Energy and Industrial Strategy
<b>DEFRA</b>	Department for Environment, Food and Rural Affairs
<b>DLHHV</b>	Designed Landscape of High Historic Value
<b>EU</b>	European Union
<b>GI</b>	Green Infrastructure
<b>GIS</b>	Geographical Information System
<b>GP</b>	General Practitioner
<b>ha</b>	Hectare
<b>HEAD</b>	Historic Environment Area Designation
<b>HGV</b>	Heavy Goods Vehicle
<b>HRA</b>	Habitats Regulations Assessment
<b>IMD</b>	Index of Multiple Deprivation
<b>IRZ</b>	Impact Risk Zone
<b>km</b>	Kilometre
<b>LA</b>	Local Authority
<b>LCT</b>	Landscape Character Type
<b>LGS</b>	Local Geological Site
<b>LNR</b>	Local Nature Reserve
<b>LSOA</b>	Lower Super Output Area
<b>LTP</b>	Local Transport Plan
<b>LVIA</b>	Landscape and Visual Impact Assessment
<b>LWS</b>	Local Wildlife Site
<b>m</b>	Metre
<b>MBC</b>	Metropolitan Borough Council
<b>MHCLG</b>	Ministry of Housing, Communities and Local Government
<b>MSA</b>	Minerals Safeguarding Area
<b>NCA</b>	National Character Area
<b>NERC</b>	Natural Environment Research Council
<b>NHS</b>	National Health Service
<b>NNR</b>	National Nature Reserve
<b>NO<sub>2</sub></b>	Nitrogen Dioxide

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<b>NPPF</b>	National Planning Policy Framework
<b>ONS</b>	Office of National Statistics
<b>OS</b>	Ordnance Survey
<b>PM<sub>10</sub></b>	Particulate Matter (10 micrometres)
<b>PPG</b>	Planning Practice Guidance
<b>PPP</b>	Policies Plans and Programmes
<b>PRoW</b>	Public Rights of Way
<b>RA</b>	Reasonable Alternative
<b>RPG</b>	Registered Park and Garden
<b>SA</b>	Sustainability Appraisal
<b>SAC</b>	Special Area of Conservation
<b>SEA</b>	Strategic Environmental Assessment
<b>SINC</b>	Site of Importance for Nature Conservation
<b>SLINC</b>	Site of Local Importance for Nature Conservation
<b>SM</b>	Scheduled Monument
<b>SPA</b>	Special Protection Area
<b>SPZ</b>	Source Protection Zone
<b>SSSI</b>	Sites of Special Scientific Interest
<b>SuDS</b>	Sustainable Drainage System
<b>SWFR</b>	Surface Water Flood Risk
<b>ZOI</b>	Zone of Influence

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# Executive Summary

## Sustainability Appraisal process

- E1 Lepus Consulting is conducting an appraisal process for the Black Country Authorities (BCA) of Dudley Metropolitan Council, Sandwell Metropolitan Council, Walsall Council and City of Wolverhampton Council to help them prepare the Black Country Plan (BCP). The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages to facilitate iteration between the Plan makers (the BCA) and the appraisal team (Lepus Consulting).
- E2 SA is the process of informing and influencing the preparation of a development plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the development plan, as the plan is prepared over several distinct stages.

## Purpose of this report

- E3 This SA report has been prepared as part of a focused consultation exercise to appraise eight additional reasonable alternative sites identified by the BCA since the Regulation 18 Preferred Options Consultation (August – September 2021), to identify their likely sustainability impacts on each objective of the SA Framework.
- E4 These sites have been assessed as part of the SA within the Regulation 18 (II) focused consultation stage. These sites have been identified following responses received from the Regulation 18 consultation, which included seven new sites submitted which were not previously assessed because of land ownership constraints which prevented them being considered reasonable alternatives, and one site where the net developable area has been revisited.

## Summary findings

- E5 A total of eight reasonable alternative sites for residential use have been identified in Walsall since the Regulation 18 Preferred Options Consultation (July, 2021) and have been assessed in this report as part of the SA process.
- E6 These eight reasonable alternative sites have been considered in addition to 723 reasonable alternative sites assessed within the Regulation 18 SA (2021)<sup>1</sup>, where potential future land uses included residential, employment and Gypsies, Traveller and Travelling Showpeople sites.

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<sup>1</sup> Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan: Regulation 18 SA Report, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date Accessed: 25/05/22]



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- E7 The SA has identified a range of positive and negative potential impacts of the reasonable alternative sites on the objectives within the SA Framework. Negative impacts were mainly related to issues associated with development located in the Green Belt outside of the existing urban areas, including the loss of previously undeveloped land, soil and mineral resources, impacts on biodiversity and landscape features, potential pollutants and greenhouse gas emissions associated with a large scale of development, and the access of site end users to a number of social facilities including healthcare services, local shops, schools and transport services.
- E8 Some (but not all) of these negative impacts may be mitigated through policy and site design.
- E9 Reasons for selection / rejection of the reasonable alternative sites considered in the plan making process have been informed by the detailed site assessment process undertaken by the BCA and includes consideration of the SA findings.
- E10 The Regulation 18 SA Report (2021) presented an outline of the reasons for selection or rejection of the reasonable alternative site locations which were identified and described as part of the July 2021 SA appraisal process.

### Next steps

- E11 This Regulation 18 (II) SA Report is subject to consultation alongside the BCA's 'Draft Plan Consultation: Additional Housing Sites in Walsall July-September 2022' document and existing evidence base that accompanied the earlier Regulation 18 Consultation for the Draft BCP.
- E12 This report represents the latest stage of the SA process. The SA process will take on board any comments on this report and use them to furnish the next report with greater detail and accuracy.
- E13 Once the BCA have reviewed consultation comments which arise through the R18(II) consultation, the plan making process will commence with the Publication Version of the plan and a new SA report will be prepared to report on all aspects of the SA and SEA process that have been undertaken to inform the emerging BCP (see **Table 1.1**).

# 1 Introduction

## 1.1 This report

- 1.1.1 The Black Country Authorities (BCA), which include Dudley Metropolitan Council, Sandwell Metropolitan Council, Walsall Council and City of Wolverhampton Council, are in the process of writing the Black Country Plan (BCP), previously referred to as the Black Country Core Strategy Review.
- 1.1.2 As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of the Strategic Environmental Assessment (SEA) Regulations 2004 (SI 1633). The purpose of SA is to assess the likely social, environmental and economic consequences of a plan from the outset, and throughout its iterative development, to ensure that sustainability considerations are taken into account.
- 1.1.3 The BCA prepared an Issues and Options document in June 2017<sup>2</sup> as part of the plan-making process, which set out to review the adopted Black Country Core Strategy in light of these challenges and opportunities. In 2021 the BCA prepared the Draft BCP<sup>3</sup>, setting out draft planning policies and allocations to support the growth and regeneration of the Black Country over the plan period. This Regulation 18 (II) SA Report follows on from the SA Scoping Report<sup>4</sup> and SA Issues and Options Report<sup>5</sup> prepared by Lepus Consulting in 2017 alongside the BCA's Issues and Options document, and the Regulation 18 SA Report<sup>6</sup> prepared by Lepus Consulting in 2021 alongside the draft BCP.
- 1.1.4 This Regulation 18 SA Report has been prepared as the third stage of the SA process in order to inform the environmental assessment of the BCP, following on from the SA outputs to date. This report will be published for consultation with the statutory consultation bodies as required by Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004<sup>7</sup> (SEA Regulations).

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<sup>2</sup> BCA (2017) Issues & Options Consultation. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p2/> [Date Accessed: 09/05/22]

<sup>3</sup> BCA (2021) Draft Black Country Plan, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p5/> [Date Accessed: 09/05/22]

<sup>4</sup> Lepus Consulting (2017) Sustainability Appraisal Scoping Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11545/sa-scoping-report-feb-2017.pdf> [Date Accessed: 09/05/22]

<sup>5</sup> Lepus Consulting (2017) SA of the Black Country Core Strategy review - Issues and Options Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11544/lc-309\\_bccs\\_sa\\_report\\_17\\_130617rc.pdf](https://blackcountryplan.dudley.gov.uk/media/11544/lc-309_bccs_sa_report_17_130617rc.pdf) [Date Accessed: 09/05/22]

<sup>6</sup> Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan – Regulation 18 SA Report. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date Accessed: 09/05/22]

<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 23/05/22]

- 1.1.5 The purpose of this SA report is to provide an appraisal of eight additional reasonable alternative sites identified by the BCA since the Regulation 18 Preferred Options Consultation (August – September 2021), to identify their likely sustainability impacts on each objective of the SA Framework. This will help the BCA to identify the most sustainable options and prepare a BCP which is economically, environmentally, and socially sustainable.

## 1.2 The Black Country

- 1.1.1 The Black Country is a predominantly urban sub-region of the West Midlands, located to the north west of Birmingham (see **Figure 1.1**). The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton. The Black Country covers an area of 35,728ha and has a combined population of approximately 1,202,500<sup>8</sup>. The sub-region is culturally diverse, and home to a greater proportion of people of people from Asian ethnic groups (14.64%) and Black ethnic groups (4.19%) in comparison to the national averages (7.5% and 3.3% respectively)<sup>910</sup>.
- 1.2.1 The area has a rich industrial heritage, including its extensive canal network, which opened up the mineral wealth of the area for exploitation during the Industrial Revolution. The area owes its name to black smoke, particularly from iron and coal industries, during a time when the Black Country became one of the most heavily industrialised areas in Britain.
- 1.2.2 Mining ceased in the area in the late 1960s, but manufacturing continues today, although on a much smaller scale. There is a total of 435,000 employee jobs across the Plan area<sup>11</sup>. In addition to manufacturing, which equates to approximately 13.8% of employee jobs in the Black Country, the biggest employment sectors include wholesale and retail trade (19.3%) and human health and social work activities (15.6%)<sup>12</sup>.
- 1.2.3 Today, the Black Country contains four Strategic Centres (the towns of Brierley Hill, Walsall and West Bromwich and the City of Wolverhampton), as well as a network of smaller towns and local centres. The major centres provide a wide range of employment, leisure, retail and tourism opportunities to serve the Black Country and the wider area.

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<sup>8</sup> Nomis (2020) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 23/05/22]

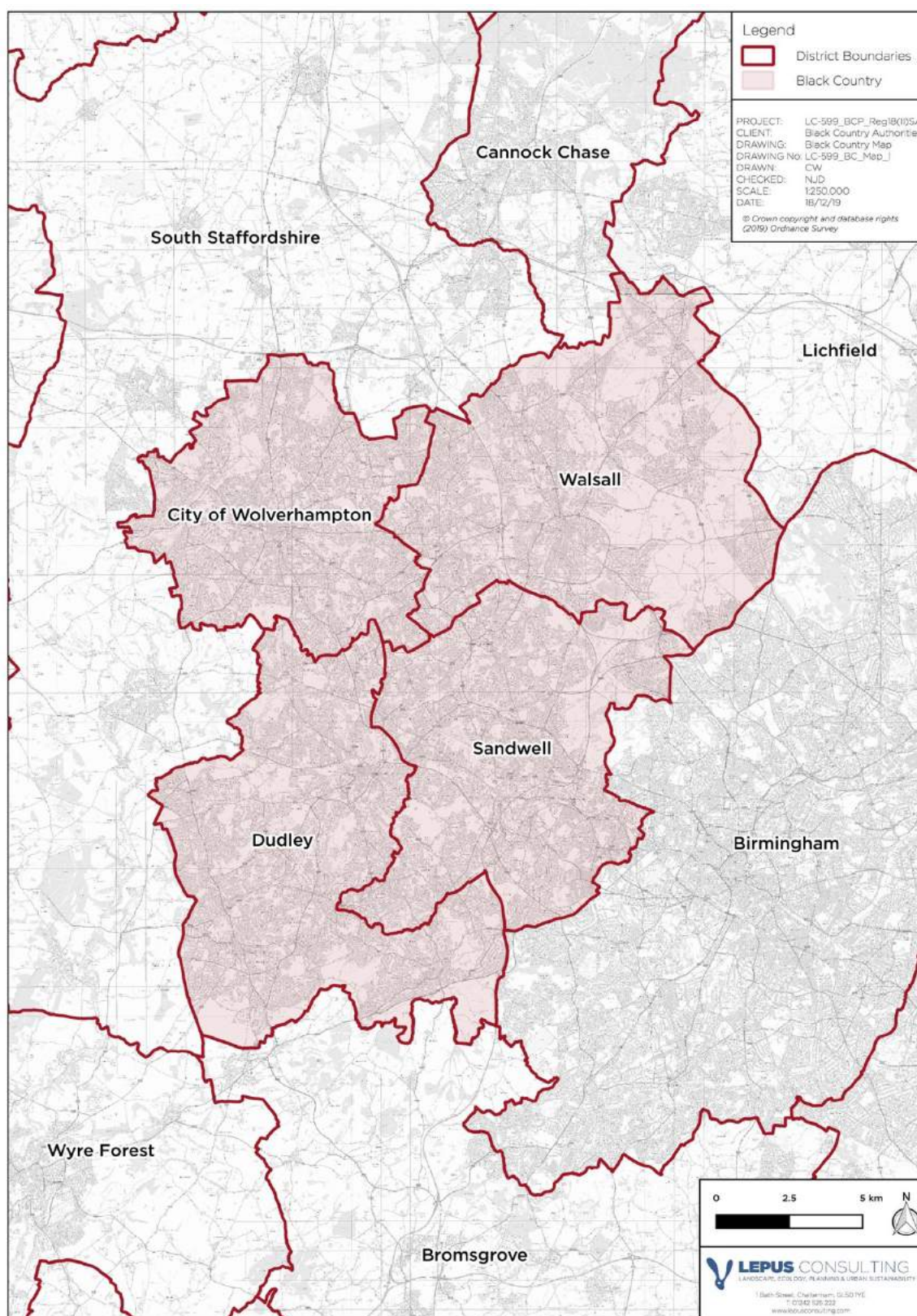
<sup>9</sup> Office of National Statistics (2020) Population of England and Wales. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/population-of-england-and-wales/latest> [Date Accessed: 23/05/22]

<sup>10</sup> Office of National Statistics (2020) Regional ethnic diversity. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/national-and-regional-populations/regional-ethnic-diversity/latest#download-the-data> [Date Accessed: 23/05/22]

<sup>11</sup> Nomis (2020) Labour Market Profile – Black Country. Available at: <https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date Accessed: 25/05/22]

<sup>12</sup> Ibid

- 1.2.4 Due to its large and growing population, the Black Country faces a challenging task to deliver good quality housing to meet the needs of the population and support the economy, whilst protecting its environmental assets and making provisions for climate change.



*Figure 1.1: City of Wolverhampton, Dudley, Sandwell and Walsall authority boundaries*



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## 1.3 The BCP Review

- 1.3.1 The Black Country covers the areas of Dudley Metropolitan Borough Council (MBC), Sandwell MBC, Walsall Council and the City of Wolverhampton Council. The four authorities worked together to produce the Black Country Core Strategy<sup>13</sup>, which was adopted in 2011.
- 1.3.2 The Draft Black Country Plan (referred to as the BCP throughout this document) contains planning policies and land allocations to support the growth and regeneration of the Black Country over the next 20 years.
- 1.3.3 The BCP, which includes both strategic and local policies, will provide a policy framework to:
- Facilitate the delivery of the right development types to meet identified and emerging needs in the most sustainable places;
  - Prevent uncoordinated development;
  - Provide certainty over the types of development that is likely to be approved;
  - Meet housing needs between now and 2039;
  - Attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;
  - Increase employment opportunities to support the delivery of the Black Country and West Midlands Combined Authority Strategic Economic Plans (SEP), Local Industrial Strategy and Covid-19 recovery plans;
  - Address the issue of climate change;
  - Promote and enhance health and well-being in accordance with the four local authorities' health and well-being strategies;
  - Protect and enhance designated areas; and
  - Ensuring infrastructure, such as roads, public transport, new schools, new healthcare facilities, upgraded utilities and broadband, waste and sewage disposal, is provided at the right time to serve the new homes and employment provision it supports.
- 1.3.4 When adopted, the Black Country Plan will replace the Black Country Core Strategy (2011) and substantial elements of 'Tier 2' Plans in the form of Area Action Plans and Site Allocations Documents.

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<sup>13</sup> Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and Wolverhampton City Council (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date Accessed: 25/05/22]

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## 1.4 Sustainability Appraisal and Strategic Environmental Assessment

- 1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC<sup>14</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport etc. (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 1.4.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004<sup>15</sup> (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the BCP to be subject to SEA throughout its preparation.
- 1.4.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>16</sup> and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA resides in The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>17</sup>. SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.4.5 Public consultation is an important aspect of the integrated SA/SEA process.

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<sup>14</sup> European Commission (2018) SEA. Available at: <https://ec.europa.eu/environment/eia/sea-legalcontext.htm> [Date Accessed: 03/07/20]

<sup>15</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 25/04/22]

<sup>16</sup> Planning and Compulsory Purchase Act (2004). Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 25/04/22]

<sup>17</sup> Town and Country Planning (Local Planning) (England) Regulations (2012). Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date Accessed: 25/04/22]

## 1.5 Best Practice Guidance

1.5.1 Government policy recommends that both SA and SEA are undertaken under a single process, which incorporates the requirements of the SEA Regulations. This is to be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>18</sup>;
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>19</sup>;
- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)<sup>20</sup>;
- Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)<sup>21</sup>; and
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>22</sup>.

## 1.6 Sustainability Appraisal

1.6.1 This document is a component of the SA of the BCP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of SA presented in **Figure 1.2**, according to the PPG on Sustainability Appraisal<sup>23</sup>.

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<sup>18</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date Accessed: 25/04/22]

<sup>19</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf) [Date Accessed: 25/04/22]

<sup>20</sup> Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 25/04/22]

<sup>21</sup> Department for Levelling Up, Housing and Communities & Ministry of Housing, Communities and Local Government (2021) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 25/04/22]

<sup>22</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sappracticeadvicefull2018c.pdf> [Date Accessed: 25/04/22]

<sup>23</sup> Ministry of Housing, Communities and Local Government (2021) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 25/05/22]

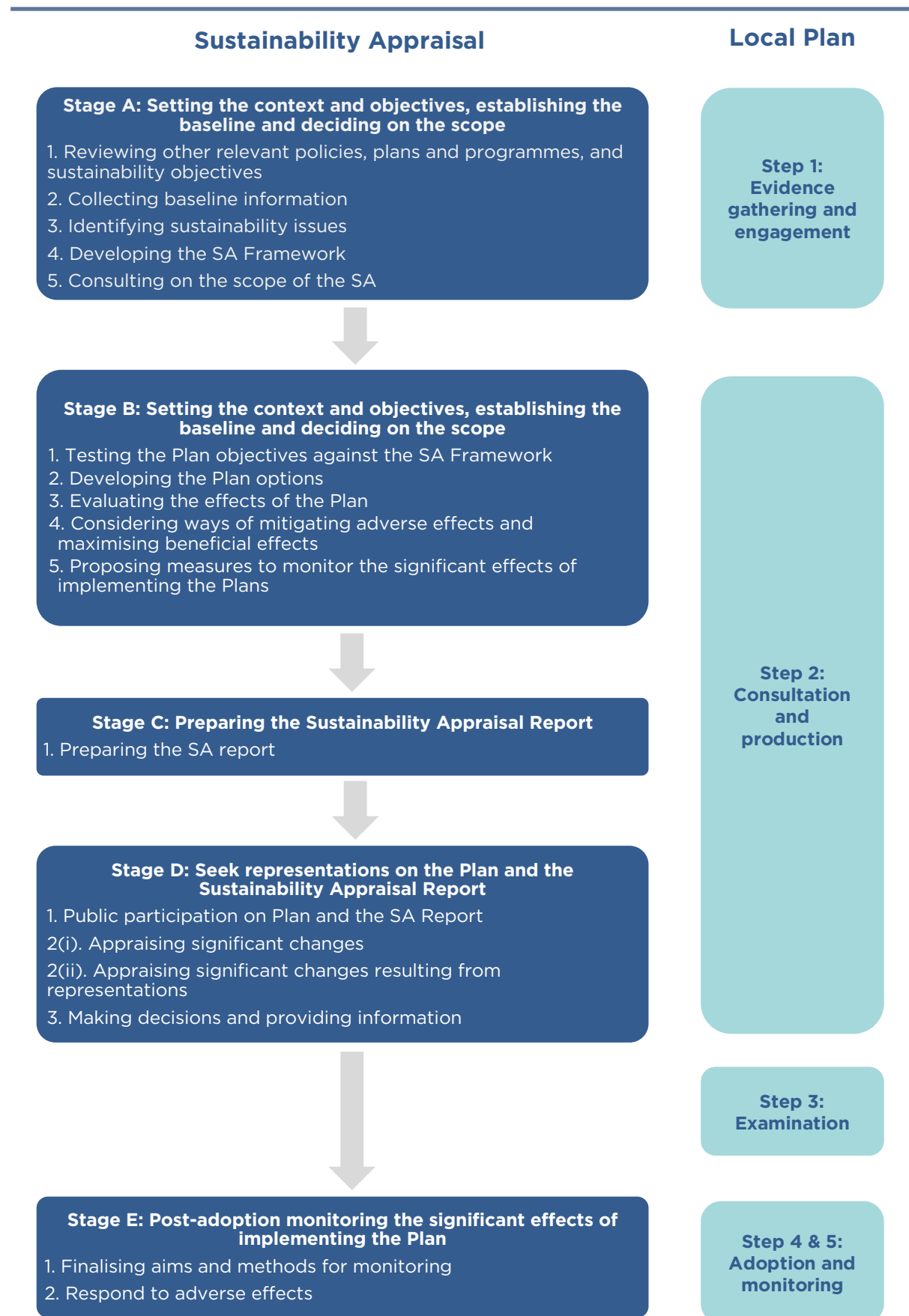


Figure 1.2: Sustainability Appraisal process



## 1.7 The SA process so far

1.7.1 **Table 1.1** below presents a timeline of stages of the BCP and SA process so far. This represents Stages A and B set out in **Figure 1.2**. Detail on these SA stages are presented in **sections 1.8 – 1.11** below.

**Table 1.1: The BCP and SA process to date**

Date	BCP Stage	Sustainability Appraisal
February 2017	N/A	<b>SA Scoping Report<sup>24</sup></b> The Scoping Report set out the key issues in relation to sustainability across the Black Country. It also presents the SA Framework against which future sustainability appraisals will be based on.
June 2017	<b>Issues and Options Report<sup>25</sup></b> The report considered nine key challenges and opportunities across the Black Country, which focused on housing and employment need, protecting the environment, providing infrastructure and close working with neighbouring authorities.	<b>Issues and Options SA Report<sup>26</sup></b> The Issues and Options SA Report assessed eight strategic options, five strategic policies and eight policy areas.
July 2021	<b>Draft Black Country Plan 2039 (Regulation 18: Preferred Options)<sup>27</sup></b> The Draft BCP contained planning policies and land allocations, as well as a vision, strategic objectives and priorities, to support the growth and regeneration of the Black Country over the plan period to 2039.	<b>Regulation 18 SA Report<sup>28</sup></b> This SA report contains an assessment of 723 reasonable alternative sites, 77 draft policies, five housing options, five employment options and eleven spatial options.
June 2022	<b>Regulation 18 (II) Additional Housing Sites in Walsall</b> The BCA prepared a site assessment report for each of the additional sites, to be consulted on alongside the existing evidence base that accompanied the Draft BCP Consultation.	<b>Regulation 18 (II) SA Report (this report)</b> This SA report contains an assessment of eight additional reasonable alternative sites and updated selection / rejection information.

<sup>24</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy: Scoping Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11545/sa-scoping-report-feb-2017.pdf> [Date Accessed: 25/05/22]

<sup>25</sup> Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council (2017) Black Country Core Strategy: Issues and Options Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11458/cs\\_final\\_amended\\_200717.pdf](https://blackcountryplan.dudley.gov.uk/media/11458/cs_final_amended_200717.pdf) [Date Accessed: 25/05/22]

<sup>26</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy Review 2016 – 2036. Issues and Options Report: Regulation 18 Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11544/lc-309\\_bccs\\_sa\\_report\\_17\\_130617rc.pdf](https://blackcountryplan.dudley.gov.uk/media/11544/lc-309_bccs_sa_report_17_130617rc.pdf) [Date Accessed: 25/05/22]

<sup>27</sup> Black Country Authorities (2021) Draft Black Country Plan, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p5/> [Date Accessed: 25/05/22]

<sup>28</sup> Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan: Regulation 18 SA Report, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date Accessed: 25/05/22]

## 1.8 Scoping Report

1.8.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report was produced by Lepus<sup>29</sup>. The SA Scoping Report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.8.2 The Scoping report was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency, as well as other relevant parties and the public. Following consultation, the Scoping report was updated in light of the comments received.

1.8.3 Each of the reasonable alternatives or options appraised in the SA process have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of the following 14 SA Objectives:

- **SA1 (Cultural Heritage):** Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.
- **SA2 (Landscape):** Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.
- **SA3 (Biodiversity, flora, fauna and geodiversity):** Protect, enhance and manage biodiversity and geodiversity.
- **SA4 (Climate change mitigation):** Minimise the Black Country's contribution to climate change.
- **SA5 (Climate change adaptation):** Plan for the anticipated levels of climate change.
- **SA6 (Natural resources):** Protect and conserve natural resources.
- **SA7 (Pollution):** Reduce air, soil, water and noise pollution.
- **SA8 (Waste):** Reduce waste generation and disposal and achieve the sustainable management of waste.
- **SA9 (Transport and accessibility):** Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.

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<sup>29</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy: Scoping Report. Available at: <https://blackcountryplan.dudley.gov.uk/media/11545/sa-scoping-report-feb-2017.pdf> [Date Accessed: 25/05/22]

- **SA10 (Housing):** Provide affordable, environmentally sound and good quality housing for all.
- **SA11 (Equality):** Reduce poverty, crime and social deprivation and secure economic inclusion.
- **SA12 (Health):** Safeguard and improve community health, safety and wellbeing.
- **SA13 (Economy):** Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.
- **SA14 (Education, skills and training):** Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.

1.8.4 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004)<sup>30</sup> (derived from Annex 1(f) of the SEA Directive). Including the SEA topics in the SA Objectives helps ensure that all of the environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.

1.8.5 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

## 1.9 Issues and Options (June, 2017)

1.9.1 The Issues and Options Report consultation formed the first stage of the formal review of the BCP. The Issues and Options Report considered nine key challenges and opportunities across the Black Country, which focused on housing and employment need, protecting the environment, providing infrastructure and close working with neighbouring authorities. The Report then set out to review the adopted Black Country Core Strategy in light of these challenges and opportunities.

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<sup>30</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 – Schedule 2 (6) identifies: “the likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as – (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l)”. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/schedule/1/made> [Date Accessed: 23/05/22]

1.9.2 The Issues and Options SA Report<sup>31</sup> assessed eight strategic options, five strategic policies and eight policy areas. The assessment of strategic options indicated that the likely strategy for growth within the Black Country has the potential to place pressure on existing infrastructure and resources. It was concluded that the overall approach which underpins the BCP policies is appropriate.

1.9.3 The consultation was held for ten weeks between July and September 2017. The comments received during the consultation period are presented in the Regulation 18 SA Report (2021).

## 1.10 Regulation 18: Preferred Options (July, 2021)

1.10.1 The Regulation 18 SA Report (2021)<sup>32</sup> provided an appraisal of housing and employment growth options, spatial options, reasonable alternative sites and policies contained in the Draft BCP.

1.10.2 The Regulation 18 SA Report was subject to consultation with a range of stakeholders and the public alongside the Draft BCP between August and October 2021. The consultation enabled interested persons to comment on the preferred planning strategy and preferred sites intended to help achieve the strategy. Comments received during the consultation period will be addressed in the Regulation 19 SA Report, where necessary.

## 1.11 Regulation 18 (II): Additional Housing Sites in Walsall

1.11.1 This Regulation 18 (II) SA Report provides an appraisal of eight reasonable alternative sites located within the Walsall Borough of the Plan area.

1.11.2 This SA Report will be subject to consultation with a range of stakeholders and the public alongside the BCA's site assessment report and existing evidence base that accompanied the earlier Regulation 18 Consultation on the Draft BCP. It will enable interested persons to comment on the preferred sites intended to help achieve the strategy. Comments received will provide a basis of any changes that may need to be made to the preferred sites.

## 1.12 Assessment of reasonable alternatives

1.12.1 The purpose of this document is to provide an appraisal of the reasonable alternatives (RAs), also known as 'options' (in this Regulation 18 (II) SA report, consisting only of reasonable alternative sites), in line with the SEA Regulations.

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<sup>31</sup> Lepus Consulting (2017) Sustainability Appraisal of the Black Country Core Strategy Review 2016 – 2036. Issues and Options Report: Regulation 18 Report. Available at: [https://blackcountryplan.dudley.gov.uk/media/11544/lc-309\\_bccs\\_sa\\_report\\_17\\_130617rc.pdf](https://blackcountryplan.dudley.gov.uk/media/11544/lc-309_bccs_sa_report_17_130617rc.pdf) [Date Accessed: 25/05/22]

<sup>32</sup> Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan: Regulation 18 SA Report, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date Accessed: 25/05/22]

- 1.12.2 Regulation 12 of the SEA Regulations<sup>33</sup> states that the Environmental Report “*shall identify, describe and evaluate the likely significant effects of the environment of – (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme*”.
- 1.12.3 PPG Paragraph: 018 Reference ID: 11-018-20140306 states that “*Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings*”.
- 1.12.4 As outlined within **sections 1.9** and **1.10**, a number of different types of reasonable alternatives have been considered previously in the SA process, including housing and employment growth options, spatial options, reasonable alternative sites and policies. This Regulation 18 (II) SA Report focuses only on reasonable alternative sites, in addition to those considered within the previous Regulation 18 SA Report.
- 1.12.5 The key aspects both the BCP and Regulation 19 SA reporting outputs will need to consider in respect to RA are:
- What reasonable alternatives have been identified and on what basis?
  - How they have been assessed and compared (including consideration of sustainability issues)?
  - What are the preferred alternatives and why they are preferred over other alternatives?
- 1.12.6 This report also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 1.1**).

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<sup>33</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 12. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/regulation/12/made> [Date Accessed: 26/05/22]

### Box 1.1: Schedule 1 of the SEA Regulations<sup>34</sup>

#### Criteria for determining the likely significance of effects (Schedule 1 of the SEA Regulations)

- 1. The characteristics of plans and programmes, having regard, in particular, to:**
  - (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
  - (b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
  - (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
  - (d) environmental problems relevant to the plan or programme; and
  - (e) the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).
- 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:**
  - (a) the probability, duration, frequency and reversibility of the effects;
  - (b) the cumulative nature of the effects;
  - (c) the transboundary nature of the effects;
  - (d) the risks to human health or the environment (e.g. due to accidents);
  - (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
  - (f) the value and vulnerability of the area likely to be affected due to:
    - i. special natural characteristics or cultural heritage;
    - ii. exceeded environmental quality standards or limit values;
    - iii. intensive land-use; and
  - (g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

## 1.13 Structure of this SA Report

1.13.1 This chapter has provided background information to the BCP and the accompanying SA and SEA work. The remainder of the Regulation 18 SA Report is structured as follows:

- **Chapter 2** – methodology and summary of the appraisal of reasonable alternative sites by SA Objective.
- **Chapter 3** – updates to the reasons for selection / rejection of reasonable alternative sites.
- **Chapter 4** – sets out the next steps for the SA and the BCP.
- **Appendix A** – the full SA Framework against which all appraisals are based.
- **Appendix B** – the appraisal of the eight reasonable alternative sites assessed at this stage, with assessments set out per SA Objective, per receptor.

<sup>34</sup> EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 20/01/20]

## 2 Assessment of Sites

### 2.1 Preface

2.1.1 The Black Country Call for Sites request first opened in July 2017 and re-opened from 9th July – 20th August 2020<sup>35</sup>. Each of the four authorities have carried out a Strategic Housing Land Availability Assessment (SHLAA) of sites within which have the potential to accommodate new housing development and an Employment Development Land Review for sites with potential to accommodate employment development. Some sites have been assessed for both potential uses within the SA process to date.

2.1.2 Across the Black Country, a total of eight additional residential sites located within Walsall were identified by the BCA as reasonable alternatives to be assessed as part of the SA within the Regulation 18 (II) focused consultation stage (see **Table 2.1**).

2.1.3 These sites have been identified following responses received from the Regulation 18 consultation, which included seven new sites submitted which were not previously assessed because of land ownership constraints which prevented them being considered reasonable alternatives, and one site where the net developable area has been revisited.

**Table 2.1: Reasonable alternative sites assessed within this SA Report**

Site Reference	Site Address	Local Authority	Site Use	Gross Area (ha)	Net Area (ha)	No. of Dwellings
SA-0037-WAL	Land West of Chester Road, North of Little Hardwick Road, Streetly	Walsall	Residential	25.98	18.73	655
SA-0318-WAL	Site A, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	Walsall	Residential	1.03	1.03	36
SA-0319-WAL	Land West and South of Oakwood Close	Walsall	Residential	0.65	0.65	7
SA-0320-WAL	Land at Rushall Hall, Leigh Road	Walsall	Residential	2.81	2.81	98
SA-0321-WAL	Pacific Nurseries	Walsall	Residential	1.15	1.15	30
SA-0322-WAL	Land East of Skip Lane and North of Woodfield Close	Walsall	Residential	5.19	5.19	135
SA-0323-WAL	Site B, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	Walsall	Residential	0.16	0.16	6
SA-0324-WAL	Site C, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	Walsall	Residential	1.84	1.84	64

<sup>35</sup> Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Date Accessed: 26/05/22]

2.1.4 The BCA have undertaken a filtering process (or ‘gateway check’) of all potential sites identified through the evidence base for the BCP in order to determine which sites should be considered as reasonable alternatives for the purpose of the SA.

2.1.5 If the following receptors were obviously present at a site, the BCA have generally rejected such sites from inclusion as a reasonable alternative to be appraised through the SA process:

- Ancient Woodland
- Burial Grounds
- Existing residential
- Flood Risk Zone 3
- HSE Inner Zone (for residential)
- Landowner has expressed unwillingness
- Local authority land with no “call for site” submitted
- Local Nature Reserve
- Open Space not surplus against current standards
- Operational sites (education, leisure, utilities, places of worship, canal network, transport infrastructure)
- Registered Parks & Gardens
- Scheduled Ancient Monuments
- Site of Importance for Nature Conservation
- Site of Special Scientific Interest
- Sites <0.25 ha with no “call for site” submitted
- Special Area of Conservation

2.1.6 Identification of a site as a reasonable alternative does not imply that the site is not subject to other constraints or indeed that any receptor listed in **para 2.1.4** will not in some way be potentially affected by a reasonable alternative site. Further potential constraints are assessed as part of the SA and plan making process for identified reasonable alternatives, using available evidence derived from publicly accessible data sources and information supplied by the BCA.

2.1.7 **Section 2.2** sets out the methodology used to appraise the reasonable alternative sites in the SA process and presents a summary of the appraisal against each SA Objective.

## 2.2 SA Assessment Methodology

2.2.1 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how different receptors should be considered in the appraisal process.



- 2.2.2 The receptors considered for each SA Objective have been discussed within the local context and assumptions set out in the Baseline (Chapter 2) of the Regulation 18 SA Report (2021)<sup>36</sup>. As no changes to the baseline have been identified following the publication of the 2021 SA Report, the baseline and local context has not been replicated in this report. The appraisal of reasonable alternative sites should be read in conjunction with the previous SA Report.
- 2.2.3 The topic-specific methodologies set out in **Boxes 2.1 to 2.14** below set out how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 2.2**.
- 2.2.4 All distances stated in site assessments are measured 'as the crow flies' from the closest point of the site/receptor in question, unless otherwise stated.

*Table 2.2: Presenting likely impacts*

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

- 2.2.5 **Appendix B** sets out the detailed appraisal of each reasonable alternative site proposed. The appraisal evaluates the likely significant effects of each reasonable alternative against the 14 SA Objectives.
- 2.2.6 The following sections of this report set out the topic-specific methodologies used to appraise the reasonable alternative sites and provides a summary of the likely significant effects of the reasonable alternative sites.

<sup>36</sup> Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan: Regulation 18 SA Report, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date Accessed: 25/05/22]

## 2.3 SA Objective 1: Cultural heritage

2.3.1 **Box 2.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.

### *Box 2.1: SA Objective 1: Cultural heritage strategic assessment methodology*

Likely Impact		Notes
Grade I Listed Buildings		
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.	Grade I Listed Buildings are considered to be those of exceptional interest.  Data for heritage assets <sup>37</sup> , including the Heritage at Risk Register <sup>38</sup> , available from Historic England.
-	Development proposal located within the wider setting of a Grade I Listed Building.	
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.	
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.	
Grade II* Listed Buildings		
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.	Grade II* Listed Buildings are considered to be those of more than special interest.  Data sourced from Historic England as above.
-	Development proposal located within the setting of a Grade II* Listed Building.	
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.	
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.	
Grade II Listed Buildings		
--	Development proposal coincides with a Grade II Listed Building.	Grade II Listed Buildings are considered to those of special interest.  Data sourced from Historic England as above.
-	Development proposal located within the setting of a Grade II Listed Building.	
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.	
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.	
Scheduled Monuments		
--	Development proposal coincides with a SM.	Scheduling is the selection of a sample of nationally
-	Development proposal located within the setting of a SM.	

<sup>37</sup> Historic England (2020) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date Accessed: 23/05/22]

<sup>38</sup> Historic England (2020) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date Accessed: 23/05/22]

Likely Impact		Notes
0	Development proposal not considered to impact an SM or its setting.	important archaeological sites.  Data sourced from Historic England as above.
+	Development proposal which could potentially enhance an SM or its setting.	
Registered Parks and Gardens		
--	Development proposal coincides with an RPG.	The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection.  Data sourced from Historic England as above.
-	Development proposal located within the setting of an RPG.	
0	Development proposal not considered likely to impact an RPG or its setting.	
+	Development proposal which could potentially enhance an RPG or its setting.	
Conservation Areas		
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.	Conservation Area data provided by the BCA.
0	Development proposal not considered to impact a Conservation Area or its setting.	Information available for Dudley <sup>39</sup> , Sandwell <sup>40</sup> , Walsall <sup>41</sup> and Wolverhampton <sup>42</sup> authorities.
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.	
Archaeological Priority Area		
-	Development proposal coincides with an APA.	Archaeology data provided by the BCA and detailed within the HLC report <sup>43</sup> .
0	Development proposal does not coincide with an APA.	
+	Development proposal which could potentially enhance an APA.	
Historic Landscape Characterisation		
-	Development proposal located within an area of high historic landscape or townscape value and/or area designed landscape of high historic value	

<sup>39</sup> Dudley Metropolitan Borough Council (2022) Conservation Areas. Available at: <https://www.dudley.gov.uk/residents/planning/historic-environment/conservation-areas/> [Date Accessed: 23/05/22]

<sup>40</sup> Sandwell Metropolitan Borough Council (2022) Listed buildings and conservation areas. Available at: [http://www.sandwell.gov.uk/info/200275/planning\\_and\\_buildings/444/listed\\_buildings\\_and\\_conservation\\_areas](http://www.sandwell.gov.uk/info/200275/planning_and_buildings/444/listed_buildings_and_conservation_areas) [Date Accessed: 23/05/22]

<sup>41</sup> Walsall Council (2022) Conservation areas. Available at: [https://go.walsall.gov.uk/conservation\\_areas](https://go.walsall.gov.uk/conservation_areas) [Date Accessed: 23/05/22]

<sup>42</sup> City of Wolverhampton Council (2021) Conservation. Available at: <https://www.wolverhampton.gov.uk/planning/conservation> [Date Accessed: 23/05/22]

<sup>43</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 23/05/22]

Likely Impact		Notes
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes	HLC data provided by the BCA and detailed within the HLC report <sup>44</sup> .
+	Development proposal which could potentially enhance historic character.	

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<sup>44</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 23/05/22]

## 2.4 SA Objective 2: Landscape

2.4.1 **Box 2.2** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.

### *Box 2.2: SA Objective 2: Landscape strategic assessment methodology*

Likely Impact		Notes
Cannock Chase AONB		
-	Development proposals which could potentially alter views experienced of or from the AONB and/or alter its setting.	Development within the Black Country would not be anticipated to result in direct adverse impacts on the special qualities of the AONB.  Data available from Natural England <sup>45</sup> .  Further information and specific objectives for the AONB are available within the Cannock Chase AONB Management Plan 2019-2024 <sup>46</sup> .
0	Development proposals are not located in close proximity to the AONB, or the nature of development is determined not to affect the character or setting of the AONB.	
+	Development proposals which would increase the understanding and enjoyment of the special qualities of the AONB.	
Landscape Sensitivity Assessment		
--	Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.	Appraisal of sites informed by the Black Country Landscape Sensitivity Assessment <sup>47</sup> .
-	Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.	
0	Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.	
+	Development proposals which would protect or enhance features of the landscape as identified within the study.	
Views for Local Residents		
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by local residents.	Views and proximity to existing residential development have been identified through the use of aerial photography and Google Maps <sup>48</sup> .  Potential positive impacts would be dependent upon the current views, and level of detail of the proposed development.
0	Development proposals are not considered to significantly alter views experienced by local residents.	
+	Development proposals which could potentially improve the views experience by some local residents.	

<sup>45</sup> Natural England (2020) Areas of Outstanding Natural Beauty (England). Available at: <https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england> [Date Accessed: 24/05/22]

<sup>46</sup> Cannock Chase Area of Outstanding Natural Beauty (2020) Cannock Chase Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: <https://cannock-chase.co.uk/wp-content/uploads/2019/10/AONB-Cannock-Chase-Management-Plan-2019-24.pdf> [Date Accessed: 16/06/21]

<sup>47</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 16/06/21]

<sup>48</sup> Google Maps (2022) Available at: <https://www.google.co.uk/maps> [Date Accessed: 25/05/22]

Likely Impact		Notes
Views from the PRoW Network		
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRoW network.	PRoW data provided by the BCA.  Views have been identified through the use of aerial photography and Google Maps <sup>49</sup> .
0	Development proposals are not considered to significantly alter views experienced by users of the PRoW network.	
+	Development proposals which could potentially improve the views experienced from the nearby PRoW network.	
Green Belt		
--	Development proposals located within areas of 'moderate-high', 'high' or 'very high' Green Belt harm.	Appraisal of sites informed by the Black Country Green Belt Study <sup>50</sup> .  It should be noted that, as stated in the Green Belt Study, " <i>landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land</i> ".
-	Development proposals located within areas of 'low-moderate' or 'moderate' Green Belt harm.	
0	Development proposals located within areas of 'very low' or 'low' Green Belt harm, or those not assessed in the study.	
+	Development proposals which would protect or enhance features of the landscape as identified within the study.	

<sup>49</sup> Ibid

<sup>50</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 23/05/22]

## 2.5 SA Objective 3: Biodiversity, flora, fauna and geodiversity

2.5.1 **Box 2.3** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

### *Box 2.3: SA Objective 3: Biodiversity, flora, fauna and geodiversity strategic assessment methodology*

Likely Impact		Notes
European site e.g. SAC, SPA or Ramsar site		
--	Development proposal coincides with, or is located in close proximity to, a SAC. Likelihood of direct impacts.	Data for SACs from Natural England <sup>51</sup> .
-	Development proposal is located within a recognised Zol or similar spatial catchment relative to the European site. Likelihood of direct or indirect impacts.	It should be noted that the HRA will provide further detail relating to potential impacts on European sites within and surrounding the Plan area.
+/-	Development located outside of a recognised Zol where, in absence of HRA conclusions, the effect of development is uncertain.	
0	Development not anticipated to result in adverse impacts on SACs.	
+	Development proposals which would be expected to enhance features within a European site.	
SSSI		
--	Development coincides with, or is located adjacent to, an SSSI.	Data for SSSIs and IRZs from Natural England <sup>52</sup> .
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.	
0	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.	
+	Development proposals which would enhance features of an SSSI.	
NNR		
--	Development coincides with an NNR. Likelihood of direct impacts.	Data for NNRs from Natural England <sup>53</sup> .
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.	
0	Development not anticipated to result in adverse impacts on NNRs.	
+	Development proposals which would enhance or create an NNR.	

<sup>51</sup> Natural England (2022) Special Areas of Conservation (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf\\_0](https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf_0) [Date Accessed: 23/05/22]

<sup>52</sup> Natural England (2022) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 22 November 2019. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 23/05/22]

<sup>53</sup> Natural England (2022) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date Accessed: 23/05/22]

Likely Impact		Notes
Ancient woodland		
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.	Data for ancient woodlands from Natural England <sup>54</sup> .
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.	
0	Development proposal would not be anticipated to impact ancient woodland.	
+	Development proposals which would enhance ancient woodland.	
SINC		
--	Development proposal coincides with a SINC. Likelihood of direct impacts.	Data for SINCs provided by the BCA.
-	Development proposal anticipated to result in adverse impacts on a SINC. Likelihood of direct or indirect impacts.	
0	Development not anticipated to result in adverse impacts on a SINC.	
+	Development proposals which would enhance or create a SINC.	
LNR		
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.	Data for LNRs from Natural England <sup>55</sup> .
0	Development proposal not anticipated to result in adverse impacts on an LNR.	
+	Development proposals which would enhance or create an LNR.	
SLINC		
-	Development proposal anticipated to result in adverse impacts on a SLINC, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.	Data for SLINCs provided by the BCA.
0	Development not anticipated to result in adverse impacts on a SLINC.	
+	Development proposals which would enhance or create a SLINC.	
Geological Conservation		
-	Development proposal anticipated to result in adverse impacts on a geological site, due to location or proximity. Likelihood of direct or indirect impacts.	Data for geological sites provided by the BCA and data for underlying

<sup>54</sup> Natural England (2022) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england> [Date Accessed: 23/05/22]

<sup>55</sup> Natural England (2022) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date Accessed: 23/05/22]



Likely Impact		Notes
0	Development proposal not anticipated to result in adverse impacts on a Geological Site.	geological context provided by British Geological Survey.
+	Development proposal anticipated to enhance a geological site.	
Priority Habitat		
-	Development proposal coincides with a priority habitat.	Data for priority habitats from Natural England <sup>56</sup> .
0	Development proposal does not coincide with a priority habitat.	
+	Development proposals which enhance or create a priority habitat.	

<sup>56</sup> Natural England (2021) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date Accessed: 23/05/22]

## 2.6 SA Objective 4: Climate change mitigation

2.6.1 **Box 2.4** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.

### *Box 2.4: SA Objective 4: Climate change mitigation strategic assessment methodology*

Likely Impact		Notes
Carbon Emissions		
--	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 1% or more in comparison to current levels.	<p>Figures calculated using UK local authority CO<sub>2</sub> emissions data<sup>57</sup> and the number of people per dwelling<sup>58</sup>, such that proposals for the following housing numbers are expected to increase carbon emissions by 1% or more in comparison to the current estimates:</p> <ul style="list-style-type: none"> <li>Dudley – 963 homes;</li> <li>Sandwell – 1,346 homes;</li> <li>Walsall – 1,165 homes; and</li> <li>Wolverhampton – 1,095 homes.</li> </ul> <p>Proposals for the following housing numbers are expected to increase carbon emissions by 0.1% or more in comparison to current estimates:</p> <ul style="list-style-type: none"> <li>Dudley – 96 homes;</li> <li>Sandwell – 135 homes;</li> <li>Walsall – 117 homes; and</li> <li>Wolverhampton – 110 homes.</li> </ul>
-	Residential-led development which could potentially result in an increase in CO <sub>2</sub> emissions by 0.1% or more in comparison to current levels.	
0	Development would be expected to result in a negligible increase in CO <sub>2</sub> emissions.	
+/-	Non-residential development where the carbon emissions produced as a result of the proposed development is uncertain.	
+	<p>Development proposals which include energy saving or renewable energy technologies.</p> <p>Development proposals which would reduce reliance on personal car use, encourage active travel or the use of public transport.</p>	

<sup>57</sup> UK local authority and regional carbon dioxide emissions national statistics: 2005-2017. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>  
[Date Accessed: 23/05/22]

<sup>58</sup> People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

## 2.7 SA Objective 5: Climate change adaptation

2.7.1 **Box 2.5** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

### *Box 2.5: SA Objective 5: Climate change adaptation strategic assessment methodology*

Likely Impact		Notes
Fluvial Flooding		
--	Development proposals which coincide with Flood Zones 3a and/or 3b.	Data for fluvial flooding produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA) <sup>59</sup> , such that: <ul style="list-style-type: none"><li>Flood Zone 3b: Functional Floodplain – land where water has to flow or be stored in times of flood;</li><li>Flood Zone 3a: Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year;</li><li>Flood Zone 2: Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and</li><li>Flood Zone 1: Less than 0.1% chance of river and sea flooding in any given year.</li></ul>
-	Development proposals which coincide with Flood Zone 2.	
+	Development proposals which are located wholly within Flood Zone 1.	
Surface Water Flooding		
--	Development proposals which coincide with areas at high risk of surface water flooding.	Based on the Environment Agency surface water flood risk data <sup>60</sup> , such that: <ul style="list-style-type: none"><li>High risk: 3.3+% chance of flooding each year;</li><li>Medium risk: between 1% - 3.3% chance of flooding each year; and</li><li>Low risk: between 0.1% - 1% chance of flooding each year.</li></ul>
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.	
0	Development proposals which are not located in areas determined to be at risk of surface water flooding.	
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures	
Indicative Flood Zone		
--	Development proposals which coincide with Indicative Flood Zone 3b.	Data for Indicative Flood Zones produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA) <sup>61</sup>
0	Development proposals which do not coincide with Indicative Flood Zone 3b.	

<sup>59</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date Accessed: 23/05/22]

<sup>60</sup> Environment Agency (2013) Risk of flooding from surface water. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297429/LIT\\_8986\\_eff63d.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8986_eff63d.pdf) [Date Accessed: 23/05/22]

<sup>61</sup> JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25<sup>th</sup> June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date Accessed: 23/05/22]

## 2.8 SA Objective 6: Natural resources

2.8.1 **Box 2.6** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.

### *Box 2.6: SA Objective 6: Natural resources strategic assessment methodology*

Likely Impact		Notes
Previously Developed (Brownfield) Land / Land with Environmental Value		
--	Development proposal located on previously undeveloped land of environmental value comprising 20ha or more.	Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF <sup>62</sup> .
-	Development proposal located on previously undeveloped land of environmental value comprising less than 20ha.	A 20ha threshold has been used based on Natural England guidance <sup>63</sup> .  Assessment of current land use and potential environmental value has been made through reference to aerial photography and the use of Google Maps. It should be noted that this may not reflect the current status of the site, and the nature of development within the site boundary is unknown, so a degree of uncertainty remains.
+	Development proposal located on previously developed land with no environmental value.	
ALC		
-	Development proposals which are situated on Grade 1, 2 or 3a ALC land.	ALC data available from Natural England <sup>64</sup> . Where Grade 3 data is not sub-divided into 3a or 3b, it is assumed that 3a is present.
0	Development proposals located on previously undeveloped land with no environmental value.	
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.	
Mineral Safeguarding Areas / Areas of Search		
-	Development proposal coincides with an MSA or AOS.	Minerals data provided by the BCA. Produced by wood consultants as part of the Black Country Minerals Study <sup>65</sup> .
0	Development proposal does not coincide with an MSA or AOS.	
+	Development proposals for the extraction of mineral resources.	

<sup>62</sup> Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 23/05/22]

<sup>63</sup> Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date Accessed: 22/01/20]

<sup>64</sup> Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: [https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d\\_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094](https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094) [Date Accessed: 23/05/22]

<sup>65</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date Accessed: 23/05/22]

## 2.9 SA Objective 7: Pollution

2.9.1 **Box 2.7** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.

### *Box 2.7: SA Objective 7: Pollution strategic assessment methodology*

Likely Impact		Notes
AQMA		
-	All development proposals in the Black Country are located within an AQMA.	UK AQMA data available from Defra <sup>66</sup> .
Main road		
-	Development proposals located within 200m of a main road.	Road data available from the Ordnance Survey <sup>67</sup> . A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance <sup>68</sup> .
0	Development proposals located over 200m from a main road.	
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.	
Water quality		
-	Development proposals located within 10m of a watercourse.	Watercourse mapping data available from the Ordnance Survey <sup>69</sup> . A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per Defra guidance <sup>70</sup> .
0	Development proposals located over 10m from a watercourse.	
+	Development proposal includes integration of GI or the naturalisation of watercourses.	

<sup>66</sup> Department for Environment Food and Rural Affairs (2019) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date Accessed: 23/05/22]

<sup>67</sup> Ordnance Survey (2019) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date Accessed: 23/05/22]

<sup>68</sup> Department for Transport (2021) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 23/05/22]

<sup>69</sup> Ordnance Survey (2022) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date Accessed: 23/05/22]

<sup>70</sup> Department for Environment Food and Rural Affairs (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 23/05/22]

Likely Impact		Notes
Groundwater SPZ		
-	Development proposal coincides with a groundwater SPZ.	SPZ data available from the Environment Agency <sup>71</sup> .  Groundwater source catchments are divided into three zones: <ul style="list-style-type: none"><li>• Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;</li><li>• Outer Zone (Zone II) – 400-day travel time; and</li><li>• Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.</li></ul>
0	Development proposal does not coincide with a groundwater SPZ.	
Increase in Air Pollution		
--	Development proposals which could potentially result in a significant increase in air pollution.	It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution <sup>72</sup> .  Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.  Where a site is proposed for the development of nine dwellings or less, or for 0.99ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.
-	Development proposals which could potentially result in a minor increase in air pollution.	
0	Development would be expected to result in a negligible increase in air pollution.	
+/-	The air pollution likely to be generated as a result of development proposals is uncertain.  Residential-led development sites for which the net housing capacity was unknown at the time of writing.	

<sup>71</sup> Environment Agency (2022) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date Accessed: 23/05/22]

<sup>72</sup> Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8.

## 2.10 SA Objective 8: Waste

2.10.1 **Box 2.8** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.

### *Box 2.8: SA Objective 8: Waste strategic assessment methodology*

Likely Impact	Notes
Waste	
--	Residential-led development which could potentially result in an increase in household waste generation by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in household waste generation by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in household waste generation.
+/-	The waste generated as a result of development proposals for non-residential use is uncertain.
+	Development proposals which include provision of waste and recycling storage.
++	Development proposals for waste or recycling facilities.

<sup>73</sup> Department for Environment, Food and Rural Affairs (2019) Local Authority Collected Waste Statistics. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date Accessed: 23/05/22]

<sup>74</sup> People per Dwelling has been calculated using the population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwellings stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

## 2.11 SA Objective 9: Transport and accessibility

2.11.1 **Box 2.9** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

### *Box 2.9: SA Objective 9: Transport and accessibility strategic assessment methodology*

Likely Impact		Notes
Bus Stop		
-	Development proposals are located over 400m from a bus stop	Bus stop data available from Transport for West Midlands <sup>75</sup> .  Target distance of 400m to a bus stop in line with Barton <i>et al.</i> sustainable distances <sup>76</sup> .
+	Development proposals are located within 400m of a bus stop	
Railway or Metro Station		
-	Development proposals are located over 2km from a railway or metro station.	Railway station data available from Transport for West Midlands.  Target distance of 2km to a railway station in line with Barton <i>et al.</i> sustainable distances.
+	Development proposals are located within 2km of a railway or metro station.	
Pedestrian Access		
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.	Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps <sup>77</sup> .
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.	
Road Access		
-	Development proposals located in areas which currently have poor access to the surrounding road network.	Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps <sup>78</sup> .
+	Development proposals which are adjacent to an existing road.	
Pedestrian Access to Local Services		
-	Development proposals are located over a 15-minute walk to local services.	Data on fresh food centre locations and accessibility modelling (travel

<sup>75</sup> Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date Accessed: 24/05/22]

<sup>76</sup> Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>77</sup> Google Maps (2022) Available at: <https://www.google.co.uk/maps> [Date Accessed: 15/05/22]

<sup>78</sup> Ibid



Likely Impact		Notes
+	Development proposals are located within a 15-minute walk to local services.	time to fresh food and centres) provided by BCA.
Public Transport Access to Local Services		
-	Development proposals are located over a 15-minute travel time via public transport to local services.	Data on fresh food centre locations and accessibility modelling (travel time to fresh food centres) provided by BCA.
+	Development proposals are located within a 15-minute travel time via public transport to local services.	

## 2.12 SA Objective 10: Housing

2.12.1 **Box 2.10** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

### *Box 2.10: SA Objective 10: Housing strategic assessment methodology*

Likely Impact		Notes
Provision of Housing		
--	Development proposals which result in a significant net decrease in housing.	Housing numbers provided by the BCA.
-	Development proposals which result in a minor net decrease in housing.	
0	Development proposals would not impact housing provision.	
+/-	It is uncertain whether the proposed development would result in a net change in housing provision. Residential-led development sites for which the net housing capacity was unknown at the time of writing.	
+	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).	
++	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).	

## 2.13 SA Objective 11: Equality

2.13.1 **Box 2.11** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

### *Box 2.11: SA Objective 11: Equality strategic assessment methodology*

Likely Impact		Notes
Index of Multiple Deprivation		
-	Development proposals within most deprived 10 percent LSOAs in England. Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.	UK Indices of Multiple Deprivation (IMD) available from MHCLG <sup>79</sup> .
0	Development proposals outside most deprived 10 percent LSOAs in England. Development proposals would be expected to have no significant impact on equality.	
+	Development proposals would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area.	

<sup>79</sup> Ministry of Housing, Communities and Local Government (2021) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714>  
[Date Accessed: 23/05/22]

## 2.14 SA Objective 12: Health

2.14.1 **Box 2.12** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.

### *Box 2.12: SA Objective 12: Health strategic assessment methodology*

Likely Impact		Notes
AQMA		
-	All development proposals in the Black Country are located within an AQMA.	UK AQMA data available from Defra <sup>80</sup> .
Main Road		
-	Development proposals located within 200m of a main road.	Road data available from the Ordnance Survey <sup>81</sup> .
+	Development proposals located over 200m from a main road.	A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance <sup>82</sup> .
NHS Hospital		
-	Development proposals located over 5km from an NHS hospital providing an A&E service.	NHS hospital department data available from the NHS website <sup>83</sup> , and local hospital data provided by the BCA.
+	Development proposals located over 5km from an NHS hospital providing an A&E service.	The target distance of 5km to an NHS hospital with an A&E service has been used in line with Barton et al. sustainable distances <sup>84</sup> .
Pedestrian Access to GP Surgery		
-	Development proposals are located over a 15-minute walk to a healthcare location.	Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by BCA.
+	Development proposals are located within a 15-minute walk to a healthcare location.	

<sup>80</sup> Department for Environment Food and Rural Affairs (2019) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date Accessed: 23/05/22]

<sup>81</sup> Ordnance Survey (2019) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date Accessed: 23/05/22]

<sup>82</sup> Department for Transport (2021) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date Accessed: 23/05/22]

<sup>83</sup> NHS (2020) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date Accessed: 23/05/22]

<sup>84</sup> Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Likely Impact		Notes
Public Transport Access to GP Surgery		
-	Development proposals are located over a 15-minute travel time via public transport to a healthcare location.	Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by BCA.
+	Development proposals are located within a 15-minute travel time via public transport to a healthcare location.	
Access to / Net Loss of Greenspace		
-	Development proposals which coincide with greenspace. Development proposals located over 600m from greenspace.	Assessment of proximity to/net loss of greenspaces based on Ordnance Survey Open Greenspaces <sup>85</sup> . It is assumed that these greenspaces are publicly accessible. The SA has not referred to other locally designated green spaces or recreational facilities due to inconsistency of data availability across the BCA.  The target distance of 600m to a public greenspace has been used in line with Barton et al. sustainable distances <sup>86</sup> .
0	Development proposals do not coincide with greenspace.	
+	Development proposals located within 600m of a greenspace.	
Access to PRoW / Cycle Routes		
-	Development proposals which are located over 600m from a PRoW and cycle route.	PRoW data provided by BCA.  Strategic cycle route data available from Transport for West Midlands <sup>87</sup> . The SA has not referred to other locally designated cycle paths due to inconsistency of data availability across the BCA.  The target distance of 600m to a footpath or cycle path has been used in line with Barton et al. sustainable distances.
+	Development proposals which are located within 600m from a PRoW and/or cycle route.	

<sup>85</sup> Ordnance Survey (2018) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date Accessed: 23/05/22]

<sup>86</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

<sup>87</sup> Transport for West Midlands (2022) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date Accessed: 23/05/22]

## 2.15 SA Objective 13: Economy

2.15.1 **Box 2.13** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

### *Box 2.13: SA Objective 13: Economy strategic assessment methodology*

Likely Impact		Notes
Pedestrian Access to Employment Opportunities		
-	Residential development proposals are located over a 30-minute walk to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute walk to a key employment location.	
Public Transport Access to Employment Opportunities		
-	Residential development proposals are located over a 30-minute travel time via public transport to a key employment location.	Data on key employment locations and accessibility modelling (travel time to employment) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 30-minute travel time via public transport to a key employment location.	
Employment Floorspace		
--	Development proposals which result in a significant net decrease in employment floorspace.	Assessment of current land use has been made through reference to aerial photography and the use of Google Maps <sup>88</sup> .
-	Development proposals which result in a minor net decrease in employment floorspace.	
0	Development proposals would not impact employment floorspace.	
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace.	
+	Development proposals which result in a minor net increase in employment floorspace.	
++	Development proposals which result in a significant net increase in employment floorspace.	

<sup>88</sup> Google Maps (2022) Available at: <https://www.google.co.uk/maps> [Date Accessed: 23/05/22]

## 2.16 SA Objective 14: Education, skills and training

2.16.1 **Box 2.14** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

*Box 2.14: SA Objective 14: Education, skills and training strategic assessment methodology.*

Likely Impact		Notes
Pedestrian Access to Primary School		
-	Residential development proposals are located over a 15-minute walk to a primary school.	Data on primary school locations and accessibility modelling (travel time to primary schools) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 15-minute walk to a primary school.	
Pedestrian Access to Secondary School		
-	Residential development proposals are located over a 25-minute walk to a secondary school.	Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 25-minute walk to a secondary school.	
Public Transport Access to Secondary School		
-	Residential development proposals are located over a 25-minute travel time via public transport to a secondary school.	Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by BCA.
0	Development proposals for non-residential use.	
+	Residential development proposals are located within a 25-minute travel time via public transport to a secondary school.	

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## 2.17 Overview of Site Assessments Pre-Mitigation

- 2.17.1 **Appendix B** provides an appraisal of each reasonable alternative site considered by the BCA at this stage within Walsall. No reasonable alternative sites for Dudley, Sandwell and Wolverhampton have been assessed within this report.
- 2.17.2 A summary of the impact matrices for the eight reasonable alternative site assessments pre-mitigation are presented in **Table 2.3**. These impacts should be read in conjunction with the assessment text narratives in **Appendix B** as well as the topic specific methodologies and assumptions presented in **Boxes 2.1 - 2.14**.
- 2.17.3 It should be noted that the site assessments include an overall impact symbol, summarised in **Table 2.3**, for each of the 14 SA Objectives. The appendices document likely impacts on receptors within each SA Objective, which have been included to provide the reader with contextual information that is relevant to each SA Objective. The overall impact symbol in **Table 2.3** for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall.
- 2.17.4 Each appraisal includes an SA impact matrix which provides an indication of the nature and magnitude of impacts **pre-mitigation**. Assessment narratives follow the impact matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- 2.17.5 All assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers.
- 2.17.6 The appraisal of the eight reasonable alternative sites is in addition to the 723 reasonable alternative sites assessed at previous stages within the SA process. The appraisal of the eight reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Table 2.3**.



**Table 2.3: Impact matrix of the eight reasonable alternative sites assessed within this report**

Site Ref	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
Reasonable Alternative Sites														
SA-0037-WAL	-	--	-	-	--	-	--	-	-	++	0	-	+	-
SA-0318-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	+
SA-0319-WAL	0	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0320-WAL	--	--	-	0	+	-	-	0	-	+	0	-	+	-
SA-0321-WAL	0	--	+/-	0	+	-	-	-	-	+	0	-	-	-
SA-0322-WAL	-	--	+/-	-	+	-	--	0	-	++	0	-	-	-
SA-0323-WAL	0	--	-	0	+	+	-	0	-	+	0	-	-	-
SA-0324-WAL	0	--	-	0	--	-	-	0	-	+	0	-	-	-

2.17.7 The following paragraphs provide an overall summary of the findings per SA Objective, as set out in **Table 2.3**. The full assessment narrative and impacts per receptor within each SA Objective can be found in **Appendix B**.

#### SA1: Cultural Heritage

2.17.8 The majority of the sites assessed are not located in close proximity to any heritage assets, and as such, negligible impacts have been identified. However, two sites (SA-0037-WAL and SA-0322-WAL) have been identified as having minor negative impacts on cultural heritage due to their location within areas identified by the HLC as Archaeological Priority Areas, and SA-0322-WAL also being within an area of High Historic Landscape Value. Site SA-0320-WAL is located within the Old Rushall Conservation Area and coincides with two Listed Buildings and two Scheduled Monuments, with potential to result in a major negative impact on cultural heritage.

#### SA2: Landscape

2.17.9 All sites have been identified as having potential to result in a major negative impact on the landscape, primarily due to their location within undeveloped areas of the Black Country and within land parcels identified as 'Moderate-High' or 'High' landscape sensitivity and/or 'Moderate-High', 'High' or 'Very High' Green Belt harm.

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### **SA3: Biodiversity**

- 2.17.10 A minor negative impact has been identified for the majority of proposed sites, owing to the potential for development related threats and pressures to some biodiversity designations such as SLINCs and priority habitats. Sites SA-0321-WAL and SA-0322-WAL have not been identified as resulting in significant effects on nearby biodiversity designations but have currently been assessed as uncertain overall with regard to potential impacts on Habitats sites.

### **SA4: Climate Change Mitigation**

- 2.17.11 All sites are proposed for residential development, with potential to increase carbon emissions to some extent and contribute to a cumulative increase in carbon emissions, associated with the construction and occupation of development as well as traffic generation. The majority of sites are proposed for relatively small amounts of development and would result in a negligible contribution to Walsall's total carbon emissions, whereas the larger sites with higher residential capacity (SA-0037-WAL and SA-0322-WAL) could result in a minor negative impact on carbon emissions.

### **SA5: Climate Change Adaptation**

- 2.17.12 The majority of sites are located wholly within Flood Zone 1 and do not coincide with any areas of surface water food risk (SWFR), resulting in a potential minor positive impact overall. However, development at Site SA-0324-WAL could potentially result in a major negative impact on climate change adaptation owing to its location within Flood Zone 2/3a and Indicative Flood Zone 3b. Site SA-0037-WAL and SA-0324-WAL also coincide with some extents of high SWFR within the site, with potential for a major negative impact.

### **SA6: Natural Resources**

- 2.17.13 The majority of sites assessed comprise previously undeveloped land, with potential to result in a minor negative impact on natural resources due to the loss of ecologically and/or agriculturally valuable soils associated with development. Four sites (SA-0037-WAL, SA-0319-WAL, SA-0321-WAL and SA-0322-WAL) also coincide with a MSA, with a minor negative impact identified owing to the potential for sterilisation of mineral resources. Only Site SA-0323-WAL has been identified as having a minor positive impact on this objective overall as it does not coincide with a MSA and comprises previously developed land.

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### **SA7: Pollution**

- 2.17.14 All sites have been identified as having adverse impacts on pollution, to some extent, owing to their location within Walsall AQMA with the proposed residential development potentially exacerbating existing air quality issues within the area following construction and occupation of the development. Sites SA-0037-WAL and SA-0322-WAL are proposed for a significant amount of development (over 100 dwellings), with potential for a major negative impact on pollution overall. Some sites have also been identified as having minor negative impacts on water pollution associated with nearby watercourses or coinciding with groundwater SPZs.

### **SA8: Waste**

- 2.17.15 All sites are proposed for residential development, with potential to increase household waste generation to some extent. The majority of sites are proposed for relatively small amounts of development and would result in a negligible contribution to Walsall's total household waste generation, whereas the larger sites with higher residential capacity (SA-0037-WAL and SA-0322-WAL) could result in a minor negative impact on waste generation.

### **SA9: Transport**

- 2.17.16 All sites are identified as having potential for a minor negative impact on transport overall, owing to their location outside of a sustainable target distance to train stations, and/or other public transport receptors.

### **SA10: Housing**

- 2.17.17 All sites are proposed for residential development, with likely positive impacts associated with the development of new housing to contribute towards the identified needs across the Black Country.

### **SA11: Equality**

- 2.17.18 None of the proposed development sites are located within the 10% most deprived LSOAs, and therefore, the proposed development may have a negligible impact on equality. However, it should be noted that there is a degree of uncertainty regarding the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

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### **SA12: Health**

- 2.17.19 All sites are identified as having a minor negative impact on health overall, due to the majority of the sites being located outside of a sustainable distance / travel time to one or more healthcare receptors, and all sites being located within Walsall AQMA where associated poor air quality could potentially result in adverse implications for human health.

### **SA13: Economy**

- 2.17.20 Three sites (SA-0321-WAL, SA-0323-WAL and SA-0324-WAL) coincide with existing businesses and could potentially result in a minor negative impact on the economy overall, associated with the loss of small amounts of employment floorspace. All sites are located within a sustainable travel time to employment opportunities, with the remaining sites identified as having a minor positive impact on sustainable access to employment, except for SA-0322-WAL where a minor negative impact could occur due to its location outside of this travel time.

### **SA14: Education**

- 2.17.21 All sites are located outside of the identified sustainable travel times to primary and/or secondary schools, with potential for a minor negative impact on sustainable access to education, except for Site SA-0318-WAL which is located within the travel time to both primary and secondary schools with likely positive impacts overall.

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## 3 Selection and Rejection of Sites

### 3.1 Overview

3.1.1 As outlined in **Section 1.12**, PPG states that the SA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward. An outline of reasons for selection and rejection of the 723 reasonable alternative site locations that were appraised at the previous SA stage are summarised in Chapter 6 of the Regulation 18 SA Report (2021).

3.1.2 Reasons for selection and rejection of the reasonable alternative sites proposed in the plan making process have been informed by the detailed site assessment process undertaken by the BCA and includes consideration of the SA findings.

### 3.2 Updates to selection / rejection since Regulation 18 (2021)

3.2.1 **Table 3.1** presents selection and rejection information for the eight sites which have been identified in Walsall, which form the basis of this Regulation 18(II) SA report and consultation. The table does not replicate the information presented in the Regulation 18 SA Report (2021), which related to reasonable alternative site locations considered at that stage.

3.2.2 The information presented in **Table 3.1** provides an outline of the reasons for selecting or rejecting the reasonable alternatives dealt with, in accordance with the requirements of the SEA Regulations. The decision making of the BCA in relation to the sites taken forward reflects the findings of the evidence base documents prepared to support the preparation of the BCP, including the findings of the SA, and has been accompanied by detailed site assessment proformas.

**Table 3.1: Updated Selected / Rejected Sites in Walsall**

Site Reference	Site Name	Selection/ Rejection status in 2021 SA Report	Selection/ Rejection status in this SA Report	Reason for Selection/Rejection provided by BCA
WALSALL				
SA-0037-WAL	Land West of Chester Road, North of Little Hardwick Road, Streetly	Rejected	Selected for housing	Originally rejected because there would be a significant impact on the character of Streetly. Since the original assessment, Water Works Farms has been completed and so the wider visual amenity impact of proposed urban development when travelling along Chester Road North to South is less than significant.
SA-0318-WAL	Site A, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	N/A – new site	Rejected	Site submitted for assessment via Reg 18 consultation representations. Site Assessment Methodology requires this site to be rejected as it is in an area classed as 'High Harm' in Green Belt Study
SA-0319-WAL	Land West and South of Oakwood Close	N/A – new site	Selected for housing	Site submitted for assessment via Reg 18 consultation representations. This site has been rejected as it is in an area classed as 'Very High Harm' in the Green Belt Study.
SA-0320-WAL	Land at Rushall Hall, Leigh Road	N/A – new site	Rejected	Site submitted for assessment via Reg 18 consultation representations. Rejected as it is unsuitable for allocation for development as it contains two scheduled monuments which are a Gateway Constraint. It is an area that has an exceptionally high level of heritage assets, including below ground archaeological remains
SA-0321-WAL	Pacific Nurseries	N/A – new site	Selected for housing	Site submitted for assessment via Reg 18 consultation representations. This is a previously developed site currently in use as a garden centre, and is considered to be suitable for allocation for housing. In addition there are further sites already proposed for BC Plan housing allocations through the Reg18 Draft Plan directly adjacent to this site and it would form part of Strategic Allocation WSA9 – Land to the east of Chester Road, north of Pacific Nurseries, Hardwick.
SA-0322-WAL	Land East of Skip Lane and North of Woodfield Close	N/A – new site	Selected for housing	Site submitted for assessment via Reg 18 consultation representations. Site appears to be suitable for development but there are issues around accessibility to health care and primary schools that need to be resolved. Character of the surrounding area is lower density than we are looking to use in BC Plan. Conservation Area issue needs to be resolved.

Site Reference	Site Name	Selection/ Rejection status in 2021 SA Report	Selection/ Rejection status in this SA Report	Reason for Selection/Rejection provided by BCA
SA-0323-WAL	Site B, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	N/A – new site	Rejected	Site submitted for assessment via Reg 18 consultation representations. This site has been rejected as it is in an area classed as 'High Harm' in Green Belt Study.
SA-0324-WAL	Site C, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	N/A – new site	Rejected	Site submitted for assessment via Reg 18 consultation representations. Site Assessment Methodology requires this site to be rejected as it is in an area classed as 'High Harm' in Green Belt Study and part of the site lies in Flood Zone 3, including the point of access.

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## 4 Next steps

### 4.1 Sustainability Appraisal and Publication/Submission

4.1.1 This Regulation 18 (II) SA Report is subject to consultation alongside the BCA's 'Draft Plan Consultation: Additional Housing Sites in Walsall July-September 2022' document and existing evidence base that accompanied the earlier Regulation 18 Consultation for the Draft BCP.

4.1.2 This report represents the latest stage of the SA process. The next stage of the SA will involve assessing the Regulation 19 (Publication) version of the BCP. An assessment of all policies and proposals presented in the BCP will be undertaken through the SA process. Findings will be presented in an SA Report that meets the requirements of the SEA Regulations.

4.1.3 Amongst the various requirements, cumulative, indirect and synergistic effects will be identified and evaluated during the assessment. An explanation of these is as follows:

- Cumulative effects arise where several developments each have insignificant effects but together have a significant effect, or where several individual effects of the BCP have a combined effect
- Indirect effects are effects that are not a direct result of the BCP but occur away from the original effect or as a result of a complex pathway
- Synergistic effects interact to produce a total effect greater than the sum of the individual effects

4.1.4 The assessment of these effects will be presented in tabular format and show where the different effects arise when two or more draft policies operate together.

4.1.5 Wherever possible, throughout the appraisal process, GIS will be used as an analytical tool to examine the spatial distribution of identified effects.



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## 4.2 Consultation of the Regulation 18 (II) SA Report

4.2.1 This Regulation 18 (II) SA Report will be published by the BCA for consultation. Consultation findings will be used to inform subsequent stages of the SA process.

4.2.2 All responses on this consultation exercise should be sent to:

Black Country Plan  
Planning & Regeneration  
4 Ednam Road  
Dudley  
DY1 1HL

Tel:  
Dudley: 01384 814136  
Sandwell: 0121 569 4249  
Walsall: 01922 658020  
Wolverhampton: 01902 554038

Email: [blackcountryplan@dudley.gov.uk](mailto:blackcountryplan@dudley.gov.uk)

4.2.3 Responses can also be left in all the libraries and council buildings in each local authority area.

4.2.4 Following consultation on the SA Report, any amendments that are made to the BCP will be appraised before preparing the final version of the SA Report to accompany the Publication version of the BCP.

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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CHEL TENHAM

## Appendix A: SA Framework

SA Objective		Decision making criteria: Will the option/proposal...		Indicators (this list is not exhaustive)
1	<b>Cultural heritage:</b> Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Q1a	Will it preserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal?	<ul style="list-style-type: none"> <li>Number and type of features and areas of historic designations in the Core Strategy area.</li> <li>Statutory and non-statutory sites in the Historic Environment Record (HER).</li> <li>Number of historic assets on the Heritage at Risk register.</li> </ul>
		Q1b	Will it preserve or enhance archaeological sites/remains?	
		Q1c	Will it preserve or enhance the setting of cultural heritage assets?	
2	<b>Landscape:</b> Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	Q2a	Will it safeguard and enhance the character of the landscape and local distinctiveness and identity?	<ul style="list-style-type: none"> <li>National Character Area.</li> <li>Tranquillity rating of area.</li> <li>Re-use of derelict buildings or re-use of buildings in a prominent location.</li> <li>Landscape sensitivity.</li> </ul>
		Q2b	Will it protect and enhance visual amenity, including light and noise pollution?	
		Q2c	Will it reuse degraded landscapes/townscapes?	
		Q2d	Will it compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl?	
3	<b>Biodiversity, flora, fauna and geodiversity:</b> Protect, enhance and manage biodiversity and geodiversity.	Q3a	Will it maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity?	<ul style="list-style-type: none"> <li>Number and diversity of European Protected Species, and NERC Act Section 41 species in the area.</li> <li>Area and condition of priority habitats.</li> <li>Area and condition of sites designated for biological and geological interest.</li> </ul>
		Q3b	Will it support positive management of local sites (SLINCs and SINCs) designated for nature conservation and geodiversity value?	
		Q3c	Will it link up areas of fragmented habitat contribute to habitat connectivity?	
		Q3d	Will it increase awareness of biodiversity assets?	

SA Objective		Decision making criteria: Will the option/proposal...		Indicators (this list is not exhaustive)
4	<b>Climate change mitigation:</b> Minimise the Black Country's contribution to climate change.	Q4a	Will it help reduce the per capita carbon footprint of the Black Country?	<ul style="list-style-type: none"> <li>Proximity to public transport links.</li> <li>Frequency of nearby public transport services.</li> <li>Distance to local services and amenities.</li> <li>Energy efficiency of buildings and transport.</li> <li>Percentage of energy in the area generated from renewable sources.</li> </ul>
		Q4b	Will it encourage renewable energy generation or use of energy from renewable sources?	
5	<b>Climate change adaptation:</b> Plan for the anticipated levels of climate change.	Q5a	Will it avoid development in areas at high risk of flooding?	<ul style="list-style-type: none"> <li>Number of properties at risk of flooding.</li> <li>Area of new greenspace created per capita.</li> <li>Connectivity of GI.</li> <li>Implementation of adaptive techniques, such as SUDS and passive heating/cooling.</li> </ul>
		Q5b	Will it increase the area and connectivity of Green Infrastructure (GI)?	
		Q5c	Will it promote use of technologies and techniques to adapt to the impacts of climate change?	
6	<b>Natural resources:</b> Protect and conserve natural resources.	Q6a	Will it utilise previously developed, degraded and under-used land?	<ul style="list-style-type: none"> <li>Re-use of previously developed land.</li> <li>Area of best and most versatile agricultural land lost to development.</li> <li>Groundwater Source Protection Zone.</li> <li>Proposed Mineral Safeguarding Area(s).</li> </ul>
		Q6b	Will it lead to the loss of the best and most versatile agricultural land?	
		Q6c	Will it lead to the loss or sterilisation of mineral resources, or affect mineral working?	
7	<b>Pollution:</b> Reduce air, soil, water and noise pollution.	Q7a	Will it maintain and improve air quality?	<ul style="list-style-type: none"> <li>Provision of GI.</li> <li>Remediation of contaminated land.</li> <li>Proximity to watercourses with poor quality status.</li> <li>Percentage change in pollution incidents.</li> <li>Development with potential to generate a significant increase in road traffic emissions or other air pollutants.</li> </ul>
		Q7b	Will it maintain soil quality or help to remediate land affected by ground contamination?	
		Q7c	Will it maintain and improve water quality?	
		Q7d	Will it help to reduce noise pollution and protect sensitive receptors from existing ambient noise?	

SA Objective		Decision making criteria: Will the option/proposal...		Indicators (this list is not exhaustive)
8	<b>Waste:</b> Reduce waste generation and disposal and achieve the sustainable management of waste.	Q8a	Will it encourage recycling/re-use/composting of waste?	<ul style="list-style-type: none"> <li>Number and capacity of waste management facilities.</li> <li>Re-use of recycled and recyclable materials.</li> <li>Management of local authority collected waste.</li> </ul>
		Q8b	Will it minimise and where possible eliminate generation of waste?	
9	<b>Transport and accessibility:</b> Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Q9a	Will it reduce the need to travel and/or reduce travel time?	<ul style="list-style-type: none"> <li>Distance to place of work.</li> <li>Distance to local amenities and key services.</li> <li>Distance to existing or proposed bus routes.</li> <li>Frequency of bus services.</li> <li>Proximity and connectivity of walking and cycling links.</li> <li>Distance to train or metro station.</li> </ul>
		Q9b	Will it provide adequate means of access by a range of sustainable transport modes (i.e. walking/cycling/public transport)?	
10	<b>Housing:</b> Provide affordable, environmentally sound and good quality housing for all.	Q10a	Will it provide a mix of good-quality housing, including homes that are suitable for first-time buyers?	<ul style="list-style-type: none"> <li>Varied housing mix.</li> <li>Percentage of dwellings delivered as affordable housing.</li> <li>Number of extra care homes.</li> </ul>
		Q10b	Will it provide housing suitable for the growing elderly population?	
		Q10c	Will it provide decent, affordable and accessible homes?	
11	<b>Equality:</b> Reduce poverty, crime and social deprivation and secure economic inclusion.	Q11a	Will it help achieve life-long learning and increase learning participation and adult education??	<ul style="list-style-type: none"> <li>No. of people with NVQ2 qualifications.</li> <li>Percentage of adults surveyed who feel they can influence decisions affecting their own local area.</li> <li>% respondents very or fairly satisfied with their neighbourhood.</li> <li>Crime Deprivation Index.</li> <li>Education, Skills &amp; Training Deprivation Index.</li> <li>Availability of libraries.</li> <li>Index of Multiple Deprivation</li> </ul>
		Q11b	Will it enable communities to influence the decisions that affect their neighbourhoods and quality of life?	
		Q11c	Will it eliminate unlawful discrimination, victimisation and harassment?	
		Q11d	Will it reduce crime and the fear of crime?	
		Q11e	Will it advance equality of opportunity?	
		Q11f	Will it foster good community relations?	

SA Objective		Decision making criteria: Will the option/proposal...		Indicators (this list is not exhaustive)
		Q11g	Is there any negative impact on individuals or groups in the community including consideration of age, disability, gender, race, religion, gender re-assignment, maternity, sexual orientation, marriage and civil partnership, and human rights?	
12	<b>Health:</b> Safeguard and improve community health, safety and wellbeing.	Q12a	Will it improve access for all to health, leisure and recreational facilities?	<ul style="list-style-type: none"> <li>Travel time by public transport to nearest health centre and sports facilities.</li> <li>Provision and accessibility of open greenspace and GI.</li> <li>Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres.</li> </ul>
		Q12b	Will it improve and enhance the Black Country's GI network?	
		Q12c	Will it improve road safety?	
		Q12d	Will it reduce obesity?	
		Q12e	Does it consider the needs of the Black Country's growing elderly population?	
13	<b>Economy:</b> Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Q13a	Will it increase accessibility of suitable employment within the Black Country?	<ul style="list-style-type: none"> <li>Number of residents working within the Black Country.</li> <li>Number of employment opportunities in professional occupations.</li> <li>Number of new business start-ups as a result of the development.</li> <li>Total amount of employment land.</li> <li>Number of vacant units in strategic centres.</li> <li>Amount of additional retail, office and leisure floorspace completed in established centres.</li> </ul>
		Q13b	Will it encourage business start-ups in the area?	
		Q13c	Will it support the health of established centres?	
		Q13d	Will it protect and create jobs?	
14	<b>Education, skills and training:</b> Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Q14a	Will it improve access for all to education and training opportunities?	<ul style="list-style-type: none"> <li>Distance to education and training, particularly primary schools and secondary schools.</li> <li>Provision of new education and training facilities and opportunities.</li> <li>Accessibility of education and training facilities by public transport.</li> <li>Capacity of local schools to meet demand from new development.</li> </ul>
		Q14b	Will it encourage a diversity of education and training opportunities?	

# Appendix B: Reasonable Alternative Site Assessments

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## B.1 Introduction

### B.1.1 Overview

B.1.1.1 This appendix provides an appraisal of eight proposed residential sites within the Black Country, located within the Walsall District, considered at the Regulation 18(II) stage (see **Table B.1.1**). These eight reasonable alternative sites have been considered in addition to 723 sites assessed within the Regulation 18 SA (2021)<sup>1</sup>.

B.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables B.2.1 – B.14.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 3** of the main SA Report.

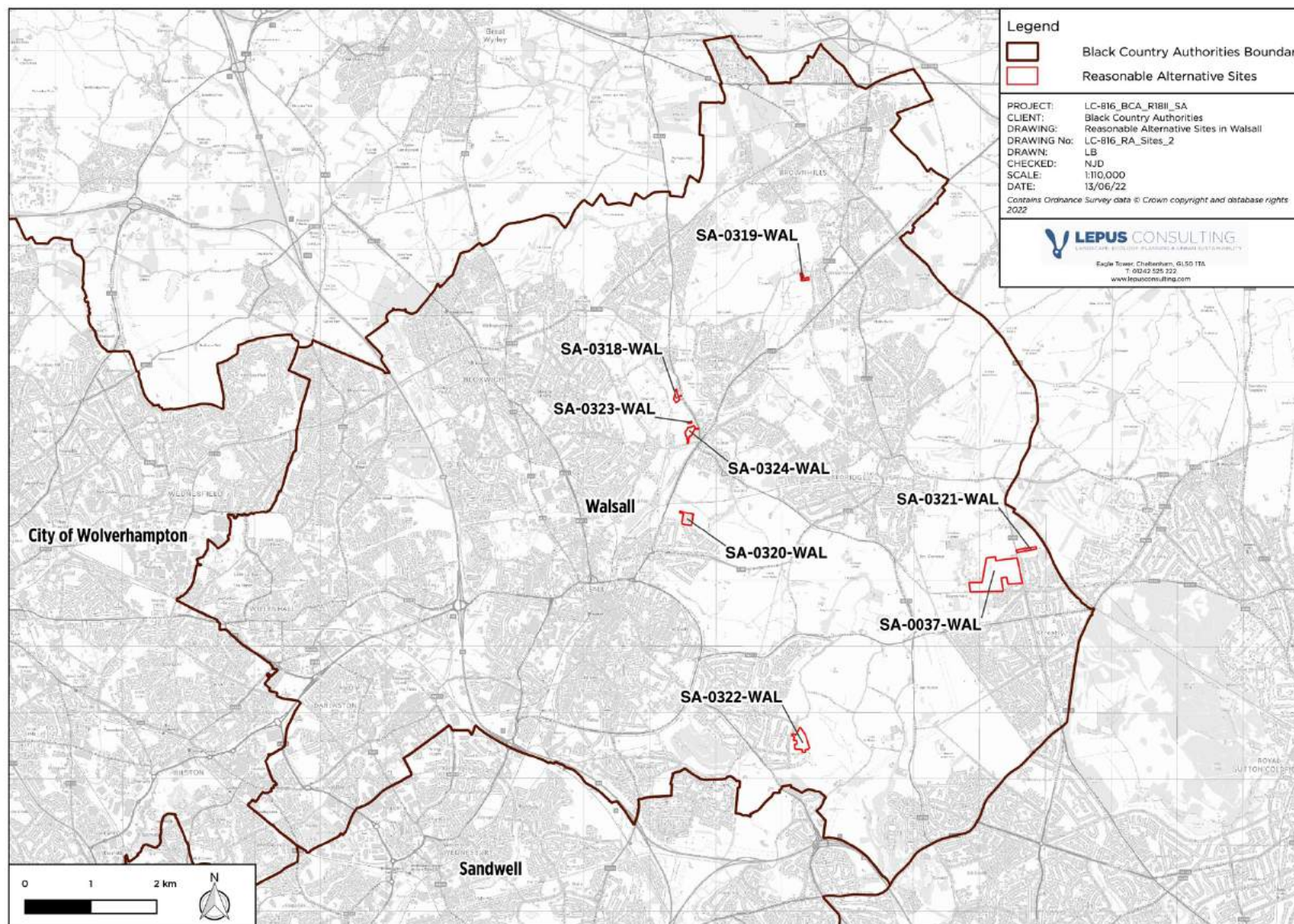
B.1.1.3 At this stage, only a baseline assessment has been carried out. Baseline assessment is the receptor-only site assessment of the red line boundary. The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation.

B.1.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Black Country Authorities (BCA), as well as expert judgement.

**Table B.1.1:** Reasonable alternative sites

Site Reference	Site Address	Local Authority	Site Use	Gross Area (ha)	Net Area (ha)	No. of Dwellings
SA-0037-WAL	Land West of Chester Road, North of Little Hardwick Road, Streetly	Walsall	Residential	25.98	18.73	655
SA-0318-WAL	Site A, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	Walsall	Residential	1.03	1.03	36
SA-0319-WAL	Land West and South of Oakwood Close	Walsall	Residential	0.65	0.65	7
SA-0320-WAL	Land at Rushall Hall, Leigh Road	Walsall	Residential	2.81	2.81	98
SA-0321-WAL	Pacific Nurseries	Walsall	Residential	1.15	1.15	30
SA-0322-WAL	Land East of Skip Lane and North of Woodfield Close	Walsall	Residential	5.19	5.19	135
SA-0323-WAL	Site B, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	Walsall	Residential	0.16	0.16	6
SA-0324-WAL	Site C, Poultry Farm to The Rear of 187 - 231 Pelsall Lane, Walsall	Walsall	Residential	1.84	1.84	64

<sup>1</sup> Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan: Regulation 18 SA Report, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date Accessed: 25/05/22]



**Figure B.1.1:** Location of the eight R18 (II) reasonable alternative sites, within Walsall Borough

## B.2 SA Objective 1: Cultural Heritage

### B.2.1 Grade I Listed Buildings

- B.2.1.1 There are no Grade I Listed Buildings located within Walsall. The proposed development at all eight sites would be unlikely to significantly impact any Grade I Listed Buildings, therefore a negligible impact has been identified across all sites.

### B.2.2 Grade II\* Listed Buildings

- B.2.2.1 There are five Grade II\* Listed Buildings within Walsall, mostly concentrated in Walsall town centre. Site SA-0320-WAL coincides with the Grade II\* Listed Building 'Gatehouse and Curtain Walls at Rushall Hall'. The proposed development at this site could potentially have direct adverse effect on this Listed Building, resulting in a major negative impact.
- B.2.2.2 The remaining proposed sites are not located in close proximity to these Grade II\* Listed Buildings. The proposed development at Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0323-WAL would be unlikely to significantly impact the setting of Grade II\* Listed Buildings, and as such, a negligible impact has been identified across these seven sites.

### B.2.3 Grade II Listed Buildings

- B.2.3.1 There are many Grade II Listed Buildings throughout the borough, generally clustered within the built-up areas and particularly within Walsall and Willenhall town centres. Site SA-0320-WAL coincides with the Grade II Listed Building 'Rushall New Hall', and is adjacent to 'Church of St Michael' and 'Barn approximately 30m south west of Gatehouse at Rushall Hall'. The site is also located approximately 70m from 'Rushall War Memorial' and 40m from 'Cross Base approximately 3m south of Church of St Michael'. The proposed development at Site SA-0320-WAL could potentially have a direct adverse effect on 'Rushall New Hall', resulting in a major negative impact, as well as result in adverse impacts on the other nearby listed buildings and their settings.
- B.2.3.2 The remaining proposed sites are not located in close proximity to these Grade II Listed Buildings. The proposed development at Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0323-WAL would be unlikely to significantly impact the setting of Grade II Listed Buildings, and as such, a negligible impact has been identified across these seven sites.

### B.2.4 Conservation Area

- B.2.4.1 Walsall contains 18 Conservation Areas (CA), the majority of which cover sections of the urban area and historic open spaces including the large 'Great Barr' CA in the south east of

the borough. A large proportion of Site SA-0322-WAL is located within ‘Great Barr’ CA. Site SA-0320-WAL is located wholly within ‘Old Rushall’ CA. The proposed development at these two sites could therefore have a minor negative impact on the character of these CAs. Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0321-WAL, SA-0323-WAL and SA-0324-WAL are not located in close proximity to any CA and therefore the proposed development at these six sites would be expected to have a negligible impact.

## **B.2.5 Scheduled Monument**

B.2.5.1 There are five Scheduled Monuments (SMs) within Walsall, generally covering small historically important areas or features. Site SA-0320-WAL coincides with two SMs, ‘Medieval fortified house at Rushall Hall’ and ‘Hlaew 12m north west of Rushall Hall’. The proposed development at this site could potentially have direct adverse effect on these SMs, resulting in a major negative impact.

B.2.5.2 The remaining proposed sites are not located in close proximity to SMs. The proposed development at Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0323-WAL would be unlikely to significantly impact the setting of SMs, and as such, a negligible impact has been identified across these seven sites.

## **B.2.6 Registered Park and Garden**

B.2.6.1 Three Registered Parks and Gardens (RPGs) can be found within Walsall: ‘Walsall Arboretum’, ‘Walsall Memorial Garden’, ‘Great Barr Hall’, with ‘Sutton Park’ located adjacent to the borough to the south east. None of the proposed sites are located in close proximity to Registered Parks and Gardens (RPGs). The proposed development at all eight sites would be unlikely to significantly impact the setting of RPGs, and as such, a negligible impact has been identified across all sites.

## **B.2.7 Archaeological Priority Area**

B.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Walsall’s urban and undeveloped areas. Site SA-0037-WAL is located adjacent to ‘Bourne Pool Area’ APA which contains prehistoric remains, and the Black Country Historic Landscape Characterisation (HLC) Study<sup>2</sup> notes that “*unsympathetic development ie. Groundworks associated with quarrying or housing development would detrimentally affect any surviving archaeological remains within the APA*”. Site SA-0320-WAL is located wholly within ‘Rushall Moated Manor Site’ APA which contains a nationally rare moated site and burial mound, where the HLC notes that “*development within the surrounds of the scheduled monument could impact upon*

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<sup>2</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 13/06/22]



*its setting*". Therefore, the proposed development at these two sites could potentially have a minor negative impact on the setting of these heritage assets.

B.2.7.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are not in close proximity to identified APAs and therefore the proposed development at these six sites would be likely to have negligible impacts on these heritage assets.

## B.2.8 Historic Landscape Characterisation

B.2.8.1 The Black Country HLC Study<sup>3</sup> has identified a range of Historic Environment Area Designations within the Black Country, covering Walsall's parkland and Green Belt as well as a number of features within the urban areas, including along the canal network.

B.2.8.2 A large proportion of Site SA-0322-WAL is located within 'Great Barr Deer Park' area of High Historic Landscape Value (HHLV). The proposed development at this site could potentially result in a minor negative impact on the surrounding historic environment.

B.2.8.3 The remaining seven sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the historic environment.

**Table B.2.1: Sites impact matrix for SA Objective 1 – Cultural heritage**

Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
<b>Reasonable Alternative Sites</b>								
SA-0037-WAL	0	0	0	0	0	0	-	0
SA-0318-WAL	0	0	0	0	0	0	0	0
SA-0319-WAL	0	0	0	0	0	0	0	0
SA-0320-WAL	0	--	--	-	--	0	-	0
SA-0321-WAL	0	0	0	0	0	0	0	0
SA-0322-WAL	0	0	0	-	0	0	0	-
SA-0323-WAL	0	0	0	0	0	0	0	0
SA-0324-WAL	0	0	0	0	0	0	0	0

<sup>3</sup> Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13895/comp\\_black-country-hlc-final-report-30-10-2019-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf) [Date Accessed: 13/06/22]

## B.3 SA Objective 2: Landscape

### B.3.1 Cannock Chase AONB

- B.3.1.1 The closest proposed site to Cannock Chase AONB is Site SA-0319-WAL, which is located approximately 7.3km south of the AONB. The proposed development at all eight sites would be unlikely to significantly impact the AONB, in terms of altering views of/from the AONB or altering the setting of the AONB. Therefore, a negligible impact has been identified across all eight sites.

### B.3.2 Landscape Sensitivity

- B.3.2.1 The Black Country Landscape Sensitivity Assessment<sup>4</sup> identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. Of the four BCA, Walsall has the largest proportion of Green Belt, which is generally in the north and east of the borough, where all eight proposed sites are located.
- B.3.2.2 Sites SA-0037-WAL and SA-0321-WAL are located within areas of 'Moderate' landscape sensitivity, and therefore, the proposed development at these two sites could potentially result in minor negative impacts on the local landscape. Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are located within areas of 'Moderate-High' landscape sensitivity, and therefore, the proposed development at these six sites could potentially result in a major negative impact on the local landscape.

### B.3.3 Views for PRow Network Users

- B.3.3.1 The Black Country's Public Right of Way (PRow) network is fragmented, with the majority of footpaths restricted to the Green Belt and areas of parkland/open space within the urban areas.
- B.3.3.2 Site SA-032-WAL is located adjacent to a PRow, and the majority of the site is currently undeveloped. The proposed development at this site would be likely to alter the views of woodland and Rushall Hall heritage assets experienced from this PRow, resulting in a minor negative impact on the landscape.
- B.3.3.3 The remaining sites contain existing development and/or are separated from nearby PRows by existing built form or trees. Therefore, the proposed development at these seven sites would be unlikely to significantly alter views and are assessed as negligible.

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<sup>4</sup> LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: [https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf) [Date Accessed: 20/05/22]

### **B.3.4 Views for Local Residents**

- B.3.4.1 The proposed development at Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL could potentially alter the views currently experienced by local residents, primarily due to their location adjacent to existing residential zones. A minor negative impact could therefore be expected following development at these seven sites.
- B.3.4.2 Site SA-0321-WAL currently comprises 'Pacific Nurseries' garden centre and parking area. As such, the proposed development at this site would not be expected to significantly change views from surrounding residential properties.

### **B.3.5 Green Belt**

- B.3.5.1 The Green Belt Study<sup>5</sup> classified parcels of Green Belt land into different 'harm' ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria.
- B.3.5.2 According to the Green Belt Study, Site SA-0321-WAL is located within an area where 'Moderate-High' Green Belt harm could be expected if developed. Sites SA-0318-WAL, SA-0323-WAL and the majority of Sites SA-0324-WAL and SA-0037-WAL are located within an area where 'High' Green Belt harm could be expected if developed. Sites SA-0319-WAL, SA-0320-WAL and a small proportion of Site SA-0037-WAL are located within an area where 'Very High' Green Belt harm could be expected upon development. Therefore, the proposed development at these seven sites could potentially result in a major negative impact on the landscape objective.
- B.3.5.3 Site SA-0322-WAL is located within an area where 'Moderate' Green Belt harm could be expected upon development, therefore the proposed development at this site could result in a minor negative impact on the landscape objective.

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<sup>5</sup> LUC (2019) Black Country Green Belt Study. Available at: [https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced\\_redacted.pdf](https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf) [Date Accessed: 20/05/22]



**Table B.3.1:** Sites impact matrix for SA Objective 2 – Landscape

Site Ref	Cannock Chase AONB	Landscape Sensitivity	Views for PRow Network Users	Views for Local Residents	Green Belt Harm
<b>Reasonable Alternative Sites</b>					
SA-0037-WAL	0	-	0	-	--
SA-0318-WAL	0	--	0	-	--
SA-0319-WAL	0	--	0	-	--
SA-0320-WAL	0	--	-	-	--
SA-0321-WAL	0	-	0	0	--
SA-0322-WAL	0	--	0	-	-
SA-0323-WAL	0	--	0	-	--
SA-0324-WAL	0	--	0	-	--

## B.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

### B.4.1 Habitats Sites

B.4.1.1 Habitats sites (previously referred to as European sites) are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). One Habitats site, 'Cannock Extension Canal' SAC, is located partially within the borough of Walsall, in the north. Additionally, 'Cannock Chase' SAC is located approximately 7.5km north of Walsall, with an identified Zone of Influence (Zoi) of 15km where recreational impacts could potentially arise as a result of new development.

B.4.1.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0323-WAL and SA-0324-WAL are located within 15km of 'Cannock Chase SAC', and therefore, the proposed development at these five sites could potentially result in a minor negative impact on this SAC. No Zoi has currently been identified for 'Cannock Extension Canal' SAC or other surrounding Habitats sites, and therefore, the impact that development at Sites SA-0037-WAL, SA-0321-WAL and SA-0322-WAL may have on Habitats sites is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

### B.4.2 Sites of Special Scientific Interest

B.4.2.1 There are eight Sites of Special Scientific Interest (SSSIs) located within Walsall, generally found towards the east of the borough, including 'Daw End Railway Cutting', 'Swan Pool & The Swag' and 'Jockey Fields' SSSIs. 'Sutton Park' SSSI is also located adjacent to the south eastern boundary of Walsall.

B.4.2.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0323-WAL and SA-0324-WAL are located within an IRZ which states that "*residential development of 50 units or more*" should consult Natural England. Sites SA-0318-WAL, SA-0319-WAL and SA-0323-WAL are proposed for the development of 36, seven and six dwellings respectively, and as such, a negligible impact on nearby SSSIs would be expected at these three sites. Sites SA-0320-WAL and SA-0324-WAL are proposed for the development of 98 and 64 dwellings respectively, and as such, development at these two sites could potentially result in a minor negative impact on SSSIs.

B.4.2.3 Sites SA-0037-WAL, SA-0321-WAL and SA-0322-WAL are located within IRZs which do not indicate the proposed residential use as a threat to nearby SSSIs, and as such, the proposed development at these three sites would be likely to have a negligible impact.

### **B.4.3 National Nature Reserves**

- B.4.3.1 Walsall does not contain any National Nature Reserves (NNRs), however, 'Sutton Park' NNR is located adjacent to the east of the borough. None of the sites within Walsall are considered likely to result in significant impacts on the NNR, primarily due to the presence of existing residential development and roads surrounding the NNR. Therefore, a negligible impact has been identified across all sites.

### **B.4.4 Ancient Woodland**

- B.4.4.1 Ancient woodlands are sparsely distributed throughout the Black Country. Areas of ancient woodland within Walsall include 'Rough Wood' in the west, and 'Cuckoos Nook' and 'Towers Covert' in the south east. Site SA-0037-WAL is located adjacent to 'Towers Covert' and therefore the proposed development at this site could potentially have a minor negative impact on this ancient woodland, due to an increased risk of disturbance. Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are located further away from ancient woodlands and/or are separated from nearby ancient woodlands by existing built form, and as such, a negligible impact would be expected.

### **B.4.5 Local Nature Reserves**

- B.4.5.1 There are ten Local Nature Reserves (LNRs) within Walsall largely located within areas of Green Belt, including 'Rough Wood Chase', 'Shire Oak Park' and 'Pelsall North Common' LNRs. Site SA-0320-WAL is located approximately 120m from 'Park Lime Pits' LNR. The proposed development at this site could potentially result in a minor negative impact on this LNR due to an increased risk of development related threats and pressures. The remaining seven proposed sites are deemed unlikely to significantly impact nearby LNRs, primarily due to being separated by existing built form.

### **B.4.6 Sites of Importance for Nature Conservation**

- B.4.6.1 Within Walsall there are 37 Sites of Importance for Nature Conservation (SINCs), primarily comprised of small woodland areas and mainly clustered within the Green Belt parcels. Site SA-0320-WAL is located adjacent to 'Park Lime Pits' SINC. The proposed development at this site could potentially result in a minor negative impact on this SINC due to an increased risk of development related threats and pressures. The remaining seven sites are located further away from SINCs and therefore are less likely to significantly impact any SINC if developed.

## **B.4.7 Sites of Local Importance for Nature Conservation**

B.4.7.1 There are approximately 98 Sites of Local Importance for Nature Conservation (SLINCs) within Walsall covering a range of habitats, hedgerows and semi-natural spaces including ‘Corporation Wood’, ‘Jockey Fields’ and ‘Daw End Canal’. Site SA-0037-WAL is located adjacent to ‘Corporation Wood and Tower’s Covert’ SLINC, and Site SA-0319-WAL is located adjacent to ‘Jockey Fields’ SLINC. Site SA-0324-WAL coincides with ‘Ford Brook’ SLINC. The proposed development at these three sites could potentially result in a minor negative impact on these SLINCs, due to an increased risk of development related threats and pressures.

B.4.7.2 Sites SA-0318-WAL, SA-0320-WAL, SA-0321-WAL, SA-0322-WAL and SA-0323-WAL are located further away from SLINCs, and as such, the proposed development at these two sites would be less likely to significantly impact any SLINC.

## **B.4.8 Geological Sites**

B.4.8.1 Geological sites have been identified throughout the borough, which form part of the Black Country Global Geopark<sup>6</sup>. These sites include a range of notable geological features and formations, including a number of SSSIs and SINC. None of the proposed sites coincide with any identified geological sites, and therefore, a negligible impact would be expected.

## **B.4.9 Priority Habitats**

B.4.9.1 Priority habitats, protected under the 2006 NERC Act<sup>7</sup>, can be found in small sections throughout Walsall, although the majority are restricted to the Green Belt. These habitats include ‘good quality semi-improved grassland’, ‘deciduous woodland’ and ‘traditional orchard’. A large proportion of Site SA-0320-WAL coincides with deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss of this habitat, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

B.4.9.2 The remaining sites do not coincide with priority habitat, and therefore the proposed development at these seven sites would be likely to have a negligible impact on the overall presence of priority habitats within the Plan area.

<sup>6</sup> Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date Accessed: 20/05/22]

<sup>7</sup> Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 20/05/22]

**Table B.4.1:** Sites impact matrix for SA Objective 3 – Biodiversity, flora, fauna and geodiversity

Site Ref	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
Reasonable Alternative Sites									
SA-0037-WAL	+/-	0	0	-	0	0	-	0	0
SA-0318-WAL	-	0	0	0	0	0	0	0	0
SA-0319-WAL	-	0	0	0	0	0	-	0	0
SA-0320-WAL	-	-	0	0	-	-	0	0	-
SA-0321-WAL	+/-	0	0	0	0	0	0	0	0
SA-0322-WAL	+/-	0	0	0	0	0	0	0	0
SA-0323-WAL	-	0	0	0	0	0	0	0	0
SA-0324-WAL	-	-	0	0	0	0	-	0	0

## B.5 SA Objective 4: Climate Change Mitigation

### B.5.1 Potential Increase in Carbon Footprint

B.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. Sites SA-0037-WAL and SA-0322-WAL are proposed for the development of 655 and 135 dwellings, respectively. The proposed development at these two sites could potentially increase carbon emissions, as a proportion of Walsall's total, by more than 0.1%, which could have a minor negative impact on Walsall's carbon emissions.

B.5.1.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL, SA-0323-WAL and SA-0324-WAL are proposed for residential development ranging between six and 98 dwellings. The proposed development at these six sites would be likely to result in a negligible contribution to Walsall's total carbon emissions.

**Table B.5.1:** Sites impact matrix for SA Objective 4 – Climate change mitigation

Site Ref	Potential Increase in Carbon Footprint
<b>Reasonable Alternative Sites</b>	
SA-0037-WAL	-
SA-0318-WAL	0
SA-0319-WAL	0
SA-0320-WAL	0
SA-0321-WAL	0
SA-0322-WAL	-
SA-0323-WAL	0
SA-0324-WAL	0

## B.6 SA Objective 5: Climate Change Adaptation

### B.6.1 Flood Zones

B.6.1.1 Watercourses that pass through the Black Country include the River Tame, River Stour and Ford Brook, as well as 15 canals. Flood Zones 2, 3a and 3b within Walsall are most prevalent within the centre and south west of the borough, associated with watercourses such as the River Tame. Approximately half of Site SA-0324-WAL coincides with Flood Zone 2 and 3a, alongside the Ford Brook. The proposed development at this site could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Walsall.

B.6.1.2 Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL, SA-0322-WAL and SA-0323-WAL proposed sites are located wholly within Flood Zone 1. Development at these seven sites would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

### B.6.2 Indicative Flood Zone 3b

B.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in future due to climate change. In Walsall this covers existing areas of Flood Zone 3a but is also shown to affect some areas within or close to the existing built-up settlements where flood risk is not currently significant. Site SA-0324-WAL partially coincides with Indicative Flood Zone 3b, and as such, the proposed development at this site could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in the future.

B.6.2.2 The remaining proposed sites do not coincide with Indicative Flood Zone 3b and therefore these seven sites may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

### B.6.3 Surface Water Flood Risk

B.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding in Walsall is extensive, and broadly affects roads and pathways with some significant localised pockets of particularly high risk throughout the borough, such as around Fishley and Brownhills in the north.

B.6.3.2 A small proportion of Sites SA-0037-WAL and SA-0324-WAL coincide with areas of high SWFR, and therefore, the proposed development at these two sites could potentially have a major negative impact, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate pluvial flood risk in surrounding locations.

B.6.3.3 The remaining six sites which do not coincide with any significant areas of SWFR would be expected to have a negligible effect on surface water flooding.

**Table B.6.1:** Sites impact matrix for SA Objective 5 – Climate change adaptation

Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
<b>Reasonable Alternative Sites</b>			
SA-0037-WAL	+	0	--
SA-0318-WAL	+	0	0
SA-0319-WAL	+	0	0
SA-0320-WAL	+	0	0
SA-0321-WAL	+	0	0
SA-0322-WAL	+	0	0
SA-0323-WAL	+	0	0
SA-0324-WAL	--	--	--



## B.7 SA Objective 6: Natural Resources

### B.7.1 Previously Undeveloped Land / Land with Environmental Value

- B.7.1.1 The Black Country is predominately urban with some scattered pockets of undeveloped land and greenspace found throughout the area, including parcels of Green Belt land in the outskirts of the Plan area. Walsall has the largest proportion of Green Belt land out of the four BCA, and consequently contains a large proportion of previously undeveloped land.
- B.7.1.2 Sites SA-0321-WAL and SA-0323-WAL comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these two sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.
- B.7.1.3 Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL and SA-0324-WAL comprise (in entirety or majority) previously undeveloped land, and contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at these six sites would be expected to have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land.

### B.7.2 Agricultural Land Classification

- B.7.2.1 In relation to Agricultural Land Classification (ALC) within Walsall, the borough is largely 'Urban' and 'Non-Agricultural' however there are also some significant areas of Grade 3 and 4 land towards the west in particular, with a very small area of Grade 2 land at the eastern edge. Grade 2, and potentially Grade 3, land represents some of the 'best and most versatile' (BMV) land within Walsall.
- B.7.2.2 Sites SA-0318-WAL, SA-0319-WAL and SA-0324-WAL are located upon 'Urban' land, and therefore, the proposed development at these three sites could potentially have a minor positive impact on natural resources as development at these sites would help to prevent the loss of BMV land across the Plan area.
- B.7.2.3 The majority of Site SA-0037-WAL and a small proportion of Sites SA-0320-WAL and SA-0322-WAL are located upon ALC Grade 3 land, and therefore, the proposed development at these three sites could potentially have a minor negative impact due to the loss of this important natural resource.
- B.7.2.4 The proposed development at Sites SA-0321-WAL and SA-0323-WAL, which are located wholly on previously developed land, would be likely to have a negligible impact on agricultural land.

## B.7.3 Mineral Safeguarding Areas / Areas of Search

- B.7.3.1 The Black Country contains potentially important mineral resources, which should be safeguarded against loss or sterilisation by non-mineral development<sup>8</sup>. The mineral resources of local and national importance in accordance with the definition set out in the NPPF include sand, gravel, brick clay and fireclay. The Review of the Evidence Base for Minerals<sup>9</sup> recommended the BCA to adopt more tightly defined MSAs focused on these resources.
- B.7.3.2 Mineral Safeguarding Areas (MSAs) have been proposed across a large proportion of Walsall borough, in the east. These include sand and gravel, brick clay and fireclay resources. Development proposals that are located within an MSA may therefore result in a minor negative impact on the accessibility of the mineral resources they contain.
- B.7.3.3 Four proposed sites are located within MSAs. Sites SA-0037-WAL and SA-0321-WAL are located within an MSA for sand and gravel, and Sites SA-0319-WAL and SA-0322-WAL are located within an MSA for brick clay. Therefore, a minor negative impact on natural resources could be expected at these four sites.
- B.7.3.4 The remaining four sites are not located within MSAs and the proposed development at these sites would be expected to have a negligible impact on mineral resources.

**Table B.7.1:** Sites impact matrix for SA Objective 6 – Natural resources

Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade	Mineral Safeguarding Areas / Areas of Search
<b>Reasonable Alternative Sites</b>			
SA-0037-WAL	-	-	-
SA-0318-WAL	-	+	0
SA-0319-WAL	-	+	-
SA-0320-WAL	-	-	0
SA-0321-WAL	+	0	-
SA-0322-WAL	-	-	-
SA-0323-WAL	+	0	0
SA-0324-WAL	-	+	0

<sup>8</sup> wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date Accessed: 20/05/22]

<sup>9</sup> “Minerals resources of local and national importance: Minerals which are necessary to meet society’s needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness”.

## B.8 SA Objective 7: Pollution

### B.8.1 Air Quality Management Area

- B.8.1.1 All four districts are designated as Air Quality Management Areas (AQMA's); 'Dudley AQMA', 'Sandwell AQMA', 'Walsall AQMA' and 'Wolverhampton AQMA'. All sites are wholly within the 'Walsall AQMA'. The proposed development at all eight proposed sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

### B.8.2 Main Road

- B.8.2.1 There are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. Walsall's major road network includes the A461, A452 and the M6 Motorway which passes through the west of the borough. Sites SA-0037-WAL and SA-0321-WAL are located adjacent to the A452. A proportion of Site SA-0324-WAL is located within 200m of the A461. The proposed development at these three sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites.
- B.8.2.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL and SA-0323-WAL are located over 200m from a main road and therefore the proposed development at these five sites would be expected to have a negligible impact on air and noise pollution associated with main roads.

### B.8.3 Watercourse

- B.8.3.1 There are many watercourses within Walsall, including the River Tame, Ford Brook and various canals and smaller watercourses. Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water. Site SA-0324-WAL coincides with the Ford Brook. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore have a minor negative impact on water quality.
- B.8.3.2 The remaining seven proposed sites are located over 10m from watercourses and are therefore less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location.

## B.8.4 Groundwater Source Protection Zone

- B.8.4.1 Source Protection Zones (SPZs) for groundwater within Walsall are located to the east of the borough and are grouped from 1 to 3 based on the level of protection that the groundwater requires.
- B.8.4.2 Sites SA-0037-WAL and SA-0321-WAL are located within the outer catchment (zone 2) and total catchment (zone 3) of a SPZ. The proposed development at these two sites could potentially increase the risk of groundwater contamination within the SPZs and have a minor negative impact on the quality or status of groundwater resources.
- B.8.4.3 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these six sites may have a negligible impact on groundwater quality.

## B.8.5 Potential Increase in Air Pollution

- B.8.5.1 Residential-led development is likely to result in an increase in air pollution, to some extent. Sites SA-0037-WAL and SA-0322-WAL are proposed for the development of 655 and 135 dwellings, respectively. The proposed development at these two sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.
- B.8.5.2 Sites SA-0318-WAL, SA-0320-WAL, SA-0321-WAL and SA-0324-WAL are proposed for the development of between ten and 99 dwellings, therefore, the proposed development at these four sites could potentially have a minor negative impact on air pollution in the local area.
- B.8.5.3 Sites SA-0319-WAL and SA-0323-WAL are proposed for the development of seven and six dwellings respectively. The proposed development at these two sites would be expected to have a negligible impact on local air pollution.

**Table B.8.1:** Sites impact matrix for SA Objective 7 – Pollution

Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
<b>Reasonable Alternative Sites</b>					
SA-0037-WAL	-	-	0	-	--
SA-0318-WAL	-	0	0	0	-
SA-0319-WAL	-	0	0	0	0
SA-0320-WAL	-	0	0	0	-
SA-0321-WAL	-	-	0	-	-
SA-0322-WAL	-	0	0	0	--
SA-0323-WAL	-	0	0	0	0
SA-0324-WAL	-	-	-	0	-

## B.9 SA Objective 8: Waste

### B.9.1 Potential Increase in Household Waste Generation

B.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL, SA-0323-WAL and SA-0324-WAL are proposed for the development of less than 108 dwellings. The proposed development at these six sites would be expected to have a negligible impact on household waste generation in comparison to current levels.

B.9.1.2 Sites SA-0037-WAL and SA-0322-WAL are proposed for the development of 655 and 135 dwellings, respectively. The proposed development at these sites could potentially increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these two sites could potentially result in a minor negative impact on household waste generation.

**Table B.9.1:** Sites impact matrix for SA Objective 8 – Waste

Site Ref	Increase in household waste generation
<b>Reasonable Alternative Sites</b>	
SA-0037-WAL	-
SA-0318-WAL	0
SA-0319-WAL	0
SA-0320-WAL	0
SA-0321-WAL	-
SA-0322-WAL	0
SA-0323-WAL	0
SA-0324-WAL	0

## B.10 SA Objective 9: Transport and Accessibility

### B.10.1 Bus Stop

B.10.1.1 The Black Country is served by regular bus links across the area provided by a number of bus operators acting within the West Midlands Bus Alliance. Within Walsall, bus stops are regularly distributed throughout the built-up areas and would generally be expected to provide good public transport access. However, some areas of the borough would be likely to have more restricted access to bus services, particularly in the eastern outskirts of the borough and the Green Belt.

B.10.1.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0322-WAL, SA-0323-WAL, SA-0324-WAL and the majority of Site SA-0037-WAL are situated within 400m of a bus stop; therefore, the proposed development at these six sites would be expected to have a minor positive impact on access to sustainable transport. Site SA-0321-WAL and the majority of Site SA-0320-WAL are located outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at these two sites could potentially have a minor negative impact on site end users' access to sustainable transport.

### B.10.2 Railway Station

B.10.2.1 Within Walsall, there are three railway stations: Walsall Station, Bloxwich Station and Bloxwich North Station. All three stations are located towards the west of the borough. Reflecting on this, all eight proposed sites are located outside of the sustainable distance of 2km from a railway station, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services.

### B.10.3 Pedestrian Access

B.10.3.1 Sites with good pedestrian access can be described as those with existing pavements or pathways which are segregated from traffic use in the area, which are found throughout the majority of built-up areas of Walsall but are more sparse towards the Green Belt and undeveloped areas.

B.10.3.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0321-WAL, SA-0322-WAL and SA-0324-WAL are well connected to the existing footpath networks, and therefore, the proposed development at these five sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created. However, the majority of Site SA-0037-WAL is situated in an area which currently has poor access to the existing footpath network, and Sites SA-0320-WAL and SA-0323-WAL are not connected to the existing footpath network. Therefore, the

proposed development at these three sites could potentially have a minor negative impact on local accessibility for pedestrians.

#### **B.10.4 Road Access**

B.10.4.1 There are many major and minor roads which run through the Black Country allowing for good transport and accessibility in the local area and nationally. Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0321-WAL, SA-0322-WAL and SA-0324-WAL are adjacent to existing roads, and therefore the proposed development at these six sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility.

B.10.4.2 Sites SA-0320-WAL and SA-0323-WAL are not accessible from the current road network, and therefore, the proposed development at these two sites could potentially have a minor negative impact on transport and accessibility.

#### **B.10.5 Pedestrian Access to Local Services**

B.10.5.1 Accessibility modelling data indicates the distribution of local fresh food and services within Walsall and considers sustainable pedestrian access to these services to be within a 15-minute walking distance. The data shows that most of the western side of the borough would be expected to have good pedestrian access to services, whereas a large proportion in the east has more limited access. Sites with sustainable pedestrian access to local fresh food and services are considered to be those within a 15-minute walking distance.

B.10.5.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0323-WAL and SA-0324-WAL are identified to be within a 15-minute walking distance to local services, and therefore, the proposed development at these five sites would be expected to have a minor positive impact on pedestrian access to local services. Sites SA-0037-WAL, SA-0321-WAL and SA-0322-WAL are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these three sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure.

#### **B.10.6 Public Transport Access to Local Services**

B.10.6.1 Accessibility modelling data indicates that although pedestrian access to local services in Walsall is limited in some areas as discussed above, in general public transport access to these services is good. Only small sections of the borough are situated over a 15-minute travel time via public transport to local services.

B.10.6.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL meet these criteria, and therefore the proposed development at these six sites could potentially have a minor positive impact on the sustainable access of site end users to local services, based on existing infrastructure.

B.10.6.3 Site SA-0321-WAL and the majority of Site SA-0037-WAL are located outside of this sustainable travel time, and therefore a minor negative impact on sustainable access to local services could be expected upon development of these two sites.

**Table B.10.1:** Sites impact matrix for SA Objective 9 – Transport and accessibility

Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
<b>Reasonable Alternative Sites</b>						
SA-0037-WAL	+	-	-	+	-	-
SA-0318-WAL	+	-	+	+	+	+
SA-0319-WAL	+	-	+	+	+	+
SA-0320-WAL	-	-	-	-	+	+
SA-0321-WAL	-	-	+	+	-	-
SA-0322-WAL	+	-	+	+	-	+
SA-0323-WAL	+	-	-	-	+	+
SA-0324-WAL	+	-	+	+	+	+



## B.11 SA Objective 10: Housing

### B.11.1 Housing Provision

B.11.1.1 Residential-led development is likely to result in a net gain in housing. The sites in Walsall proposed for residential use would therefore be expected to result in positive impacts under this objective.

B.11.1.2 Sites which have been identified as having capacity for 100 or more dwellings (SA-0037-WAL and SA-0322-WAL) would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.

B.11.1.3 Sites which have been identified as having capacity for 99 dwellings or less (SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL, SA-0323-WAL and SA-0324-WAL) would be expected to result in a minor positive impact on housing provision.

**Table B.11.1:** Sites impact matrix for SA Objective 10 – Housing

Site Ref	Housing provision
<b>Reasonable Alternative Sites</b>	
SA-0037-WAL	++
SA-0318-WAL	+
SA-0319-WAL	+
SA-0320-WAL	+
SA-0321-WAL	+
SA-0322-WAL	++
SA-0323-WAL	+
SA-0324-WAL	+

## B.12 SA Objective 11: Equality

### B.12.1 Index of Multiple Deprivation

- B.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England<sup>10</sup>. Out of 317 Local Authorities in England, Walsall is ranked as the 25<sup>th</sup> most deprived<sup>11</sup>. Overall deprivation is relatively high across the Black Country, with 42 of the LSOAs in Walsall ranked among the 10% most deprived in England.
- B.12.1.2 Deprivation levels within the borough of Walsall varies throughout the community, although generally the more deprived areas are within the central and western parts of the borough, such as Walsall and Bloxwich town centres.
- B.12.1.3 None of the proposed development sites are located within the 10% most deprived LSOAs, and therefore, the proposed development at these eight sites may have a negligible impact on equality.
- B.12.1.4 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

**Table B.12.1:** Sites impact matrix for SA Objective 11 – Equality

Site Ref	IMD 10% Most Deprived
<b>Reasonable Alternative Sites</b>	
SA-0037-WAL	0
SA-0318-WAL	0
SA-0319-WAL	0
SA-0320-WAL	0
SA-0321-WAL	0
SA-0322-WAL	0
SA-0323-WAL	0
SA-0324-WAL	0

<sup>10</sup> Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 06/05/21]

<sup>11</sup> Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.the-blackcountry.com/upload/BC%20IMD%202019.pdf> [Date Accessed: 06/05/21]

## B.13 SA Objective 12: Health

### B.13.1 NHS Hospital with Accident & Emergency Department

B.13.1.1 Within Walsall, Manor Hospital is the only NHS Hospital with an Accident & Emergency department although there are several other hospitals within and surrounding the Black Country providing these services such as Sandwell General Hospital approximately 3.5km to the south, and Good Hope Hospital approximately 4.5km to the east of the borough. The majority of the built-up areas of Walsall are located within a sustainable 5km distance to one or more hospitals, however, a large proportion to the north and east of the borough would be likely to have more restricted access.

B.13.1.2 Sites SA-0318-WAL, SA-0320-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are located within 5km of Manor Hospital, and therefore, the proposed development at these five sites could potentially have a minor positive impact on access to emergency healthcare. However, Sites SA-0037-WAL, SA-0319-WAL and SA-0321-WAL are located over 5km from a hospital, and therefore, the proposed development at these three sites could potentially more restricted sustainable access to emergency healthcare and result in a minor negative impact.

### B.13.2 Pedestrian Access to GP Surgery

B.13.2.1 The BCA have provided Lepus with information regarding the location of local healthcare facilities and accessibility modelling data. According to this data, there are 68 GP Surgeries within Walsall serving the existing local communities, although the distribution of these facilities is mainly towards the western half of the borough.

B.13.2.2 Sites SA-0318-WAL, SA-0323-WAL, SA-0324-WAL and the majority of Site SA-0319-WAL are located within a 15-minute walking distance from a GP surgery. The proposed development at these four sites would be expected to have a minor positive impact on pedestrian access to healthcare, based on existing infrastructure. However, Sites SA-0037-WAL, SA-0320-WAL, SA-0321-WAL and SA-0322-WAL are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare.

### B.13.3 Public Transport Access to GP Surgery

B.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. Accessibility modelling data indicates that the majority of Walsall falls within this distance, except some small pockets within the Green Belt in the east where accessibility is likely to be somewhat restricted.

B.13.3.2 Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0323-WAL and SA-0324-WAL are located within this travel time to a GP surgery via public transport, and therefore, the proposed development at these five sites would be expected to have a minor positive impact on sustainable access to healthcare. However, Sites SA-0037-WAL, SA-0321-WAL and SA-0322-WAL are located outside of the sustainable distance to a GP surgery, therefore a minor negative impact on sustainable access to these healthcare facilities would be expected at these three sites.

#### **B.13.4 Air Quality Management Area**

B.13.4.1 All four districts are designated as AQMAs; 'Dudley AQMA', 'Sandwell AQMA', 'Walsall AQMA' and 'Wolverhampton AQMA'. All proposed development sites are wholly within 'Walsall AQMA'. The proposed development at all eight sites would be likely to expose site end users to poor air quality associated with these AQMAs, and therefore, have a minor negative impact on health.

#### **B.13.5 Main Road**

B.13.5.1 There are a large number of motorways and A-roads which cross the Plan area, each of which represent traffic-related sources of air pollution. Walsall's major road network includes the A461, A452 and the M6 Motorway which passes through the west of the borough.

B.13.5.2 Sites SA-0037-WAL and SA-0321-WAL are located adjacent to the A452. A proportion of Site SA-0324-WAL is located within 200m of the A461. The proposed development at these three sites could potentially have a minor negative impact on site end users' health, due to the vicinity of the main roads and likely higher levels of transport associated air pollution. On the other hand, the proposed development at Sites SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0322-WAL and SA-0323-WAL, which are over 200m from a main road, could potentially have a minor positive impact on health, as site end users in these locations would be situated away from major sources of traffic related air pollution.

#### **B.13.6 Access to Greenspace**

B.13.6.1 Greenspaces are distributed throughout Walsall, including parks, allotments and playing field, as well as Roughwood Country Park in the north west of the borough. All proposed sites are located within 600m of one or more greenspaces. Therefore, a minor positive impact would be expected at these eight sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

## B.13.7 Net Loss of Greenspace

B.13.7.1 None of the proposed sites are identified as coinciding with a greenspace. A negligible impact would be expected as a result of development at these eight sites.

## B.13.8 Public Right of Way / Cycle Path

B.13.8.1 There is an extensive PRoW and cycle network in the Black Country. This includes many routes along the canal network and disused railway lines, which provide a recreational resource as well as links to other modes of transport.

B.13.8.2 Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL, SA-0323-WAL and SA-0324-WAL are located within 600m of the PRoW network. The proposed development at these seven sites would be likely to provide site end users with good pedestrian access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. The majority of Site SA-0322-WAL is located outside of this target distance to the PRoW and cycle network, and therefore a minor negative impact on the health and wellbeing of local residents could be expected.

**Table B.13.1:** Sites impact matrix for SA Objective 12 – Health

Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
Reasonable Alternative Sites								
SA-0037-WAL	-	-	-	-	-	+	0	+
SA-0318-WAL	+	+	+	-	+	+	0	+
SA-0319-WAL	-	+	+	-	+	+	0	+
SA-0320-WAL	+	-	+	-	+	+	0	+
SA-0321-WAL	-	-	-	-	-	+	0	+
SA-0322-WAL	+	-	-	-	+	+	0	-
SA-0323-WAL	+	+	+	-	+	+	0	+
SA-0324-WAL	+	+	+	-	-	+	0	+

## B.14 SA Objective 13: Economy

### B.14.1 Employment Floorspace Provision

- B.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- B.14.1.2 Site SA-0321-WAL coincides with 'Pacific Nurseries' garden centre. Site SA-0323-WAL coincides with buildings/kennels associated with 'K9 Kuts'. Site SA-0324-WAL coincides with 'Aristocats Luxury Cattery'. Therefore, the proposed residential development at these three sites could potentially result in a net loss of employment floorspace, resulting in a minor negative impact on employment floorspace provision due to the possible loss of a small areas of employment land.
- B.14.1.3 Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0320-WAL and SA-0322-WAL do not coincide with any identified employment sites and would not be expected to result in a net change in employment floorspace. Therefore, the proposed development at these five sites would be likely to have a negligible impact on the provision of employment opportunities.

### B.14.2 Pedestrian Access to Employment Opportunities

- B.14.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping key employment locations and areas within a sustainable travel time. The majority of employment locations are clustered in the south west and north east of the borough. According to the modelling data, almost the entirety of the borough is within a 30-minute walk to an employment location, however, some small areas located within Green Belt areas in the south eastern corner of the borough are outside of this.
- B.14.2.2 Sites SA-0037-WAL, SA-0318-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL, SA-0323-WAL and SA-0324-WAL are located within this identified sustainable travel time to employment opportunities, and therefore, a minor positive impact on pedestrian access to employment could be expected at these seven sites.
- B.14.2.3 The majority of Site SA-0322-WAL is located outside of this sustainable travel time to employment opportunities and therefore the proposed development at this site could potentially have a minor negative impact on pedestrian access to employment opportunities, based on current infrastructure.

### B.14.3 Public Transport Access to Employment Opportunities

B.14.3.1 Accessibility modelling data indicates that the majority of borough, except for a very small area in the east, is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey.

B.14.3.2 All eight of the proposed sites are located within this identified sustainable travel time to employment opportunities, and therefore, a minor positive impact on public transport access to employment could be expected.

**Table B.14.1:** Sites impact matrix for SA Objective 13 – Economy

Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
<b>Reasonable Alternative Sites</b>			
SA-0037-WAL	0	+	+
SA-0318-WAL	0	+	+
SA-0319-WAL	0	+	+
SA-0320-WAL	0	+	+
SA-0321-WAL	-	+	+
SA-0322-WAL	0	-	+
SA-0323-WAL	-	+	+
SA-0324-WAL	-	+	+

## B.15 SA Objective 14: Education, Skills and Training

### B.15.1 Pedestrian Access to Primary School

B.15.1.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of primary schools and areas within a sustainable travel time to these schools. There are 87 primary schools within Walsall, although these are mainly distributed within the west of the borough where current residential areas are most dense. The majority of the built-up areas are located within a 15-minute walk to a primary school, however, a large proportion towards the east of the borough is likely to have more restricted access, including the Green Belt where the majority of proposed sites are located.

B.15.1.2 As such, Sites SA-0037-WAL, SA-0319-WAL, SA-0320-WAL, SA-0321-WAL and SA\_0322-WAL are located outside of a 15-minute walk to a primary school. Therefore, the proposed development at these five sites could potentially have a minor negative impact on pedestrian access to primary schools, based on current infrastructure. Residents in these areas may be reliant on less sustainable travel methods to reach primary schools.

B.15.1.3 Sites SA-0318-WAL, SA-0323-WAL and SA-0324-WAL are located within a 15-minute walk to a primary school, and therefore, the proposed development at these three sites could potentially have a minor positive impact on pedestrian access to primary schools.

### B.15.2 Pedestrian Access to Secondary School

B.15.2.1 Accessibility modelling data has been provided to Lepus by the BCA, mapping the location of secondary schools and areas within a sustainable travel time to these schools. Most secondary schools within Walsall are located within the built-up areas in the west of the borough, and therefore serve those communities well. Sites within existing settlements are likely to have better pedestrian access compared to the outskirts of settlements or Green Belt.

B.15.2.2 Sites SA-0318-WAL, SA-0319-WAL and SA-0320-WAL are located within a 25-minute walk to a secondary school, and therefore, the proposed development at these three sites could be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training. However, Sites SA-0037-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are situated in the areas outside of a 25-minute walk to a secondary school, and as such, the proposed development at these five sites could potentially have a minor negative impact on sustainable access to secondary schools, based on current infrastructure.



### B.15.3 Public Transport Access to Secondary School

- B.15.3.1 Public transport provision within Walsall is extensive and would be likely to ensure that the majority of residents have sustainable travel options to secondary schools in the local and wider area. Accessibility modelling data indicates only localised pockets of the borough where public transport access to secondary schools is limited, for example in Shortheath in the west, and Druid's Heath in the east.
- B.15.3.2 Sites SA-0037-WAL, SA-0318-WAL, SA-0320-WAL, SA-0321-WAL, SA-0322-WAL, SA-0323-WAL and SA-0324-WAL are located within a 25-minute public transport journey to a secondary school, and therefore, the proposed development at these seven sites would be expected to have a minor positive impact on sustainable access to education, based on current infrastructure. However, Site SA-0319-WAL is located outside of this sustainable travel time to a secondary school, and therefore, the proposed development at this site could potentially have a minor negative impact on new residents' sustainable access to education, based on current infrastructure.

**Table B.15.1:** Sites impact matrix for SA Objective 14 – Education, skills and training

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
<b>Reasonable Alternative Sites</b>			
SA-0037-WAL	-	-	+
SA-0318-WAL	+	+	+
SA-0319-WAL	-	+	-
SA-0320-WAL	-	+	+
SA-0321-WAL	-	-	+
SA-0322-WAL	-	-	+
SA-0323-WAL	+	-	+
SA-0324-WAL	+	-	+



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