

Sustainability Appraisal of the Sandwell Local Plan 2022-2041

Regulation 19 SA Report

Volume 1 of 3: Non-Technical Summary

DRAFT
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LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Sandwell Local Plan 2022-2041

Including: Strategic Environmental Assessment

Regulation 19 SA

Volume 1 of 3: Non-Technical Summary

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Contents of the NTS

1	Introduction.....	N1
2	Purpose and content of the Regulation 19 SA Report	N8
3	Baseline and key sustainability issues	N10
4	Evolution of the environment without the Local Plan	N19
5	SA methodology.....	N23
6	Reasonable alternatives.....	N26
7	The preferred approach.....	N44
8	Likely significant effects on the environment.....	N49

Figures

Figure N.1:	Sustainable development	N2
Figure N.2:	Sustainability Appraisal and Local Plan process	N3
Figure N.3:	Map of Sandwell Metropolitan Borough	N5
Figure N.4:	Stages in the plan-making process accompanied by SA outputs	N6
Figure N.5:	Definitions for the different types of reasonable alternatives assessed in the SA process	N27
Figure N.6:	The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process.....	N28

Tables

Table N.1: Likely evolution without the Sandwell Local Plan	N19
Table N.2: SA Framework summary	N24
Table N.3: Guide to scoring significant effects.....	N25
Table N.4: Housing growth options identified by SMBC (see Regulation 18 (II) Draft Plan SA Report 2023) ...	N29
Table N.5: Summary SA findings for assessment of housing growth options A-F	N30
Table N.7: Employment growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)	N31
Table N.8: SA performance of the employment growth options (see the R18 (II) Draft Plan SA Report, 2023)	N31
Table N.9: Gypsy, Traveller and Travelling Showpeople growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)	N32
Table N.10: SA performance of the Gypsy, Traveller and Travelling Showpeople growth options (see the R18 (II) Draft Plan SA Report, 2023)	N32
Table N.11: Spatial growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023).....	N33
Table N.12: SA performance of the Spatial growth options (see the R18 (II) Draft Plan SA Report, 2023).....	N34
Table N.13: Summary of pre-mitigation reasonable alternative site assessments (extracted from Appendix E)	N37
Table N.14: Summary of post-mitigation reasonable alternative site assessments (extracted from Appendix G)	N40
Table N.15: Sandwell Local Plan Policies.....	N44
Table N.16: Summary of policy assessments.....	N47
Table N.18: Summary of identified potential impacts of the Sandwell Local Plan	N50
Table N.19: Summary of policy mitigation	N53
Table N.20: Likely residual positive sustainability effects of the SLP	N59
Table N.21: Likely residual adverse sustainability effects of the SLP	N61
Table N.22: Cumulative effects assessment of the Local Plan	N63
Table N.23: Proposals for monitoring adverse sustainability impacts of the SLP	N67

1 Introduction

The purpose of this report

- N1. Lepus Consulting Ltd (Lepus) has been instructed by Sandwell Metropolitan Borough Council (SMBC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), for the Sandwell Local Plan (2022-2041).
- N2. The Regulation 19 SA Report has been prepared to present full details of the SA process to date and inform SMBC's preparation of the Sandwell Local Plan.
- N3. This document comprises a Non-Technical Summary (NTS) of the Regulation 19 SA for the Sandwell Local Plan, which presents an assessment of the likely sustainability impacts of proposals set out in the Plan. This NTS document comprises **Volume 1** of the SA; it is accompanied by **Volume 2**: The Main SA Report and **Volume 3**: Appendices to the main SA Report.

The Sandwell Local Plan

- N4. The UK Government requires that local plans should be reviewed every five years and updated as necessary. The Sandwell Local Plan (SLP) will include the overall strategy for development in Sandwell Metropolitan Borough for the Plan period 2022 to 2041, including a vision for Sandwell in 2041 and underpinning strategic objectives, and an overall spatial strategy supported by site allocations and policies to guide land use and development within the borough.
- N5. The SLP vision and objectives were drafted by SMBC, employing the principles of the extant Council Vision and the direction of travel set out within the Black Country Plan (BCP). The vision and objectives were both subject to public consultation and comments made during this period have been taken into account. In addition, the SLP SA and subsequent comments have also been considered and have been used to make the reflect sustainability issues, such as the circular economy, within the vision.

What is Sustainability Appraisal and Strategic Environmental Assessment?

- N6. The Planning and Compulsory Purchase Act¹ requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations² (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including development plan

¹ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 28/08/24]

² The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 28/08/24]

documents, to ensure that environmental issues are fully integrated and addressed during decision-making.

- N7. SA is the process of informing and influencing the preparation of a local plan or development plan document to optimise its sustainability. SA considers the social, economic and environmental performance of the plan. The SA (and SEA) can help to ensure that proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the plan throughout its development.
- N8. Sustainability can be defined as “*meeting the needs of the present generation without compromising the ability of future generations to meet their own needs*”³. To be sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1**).

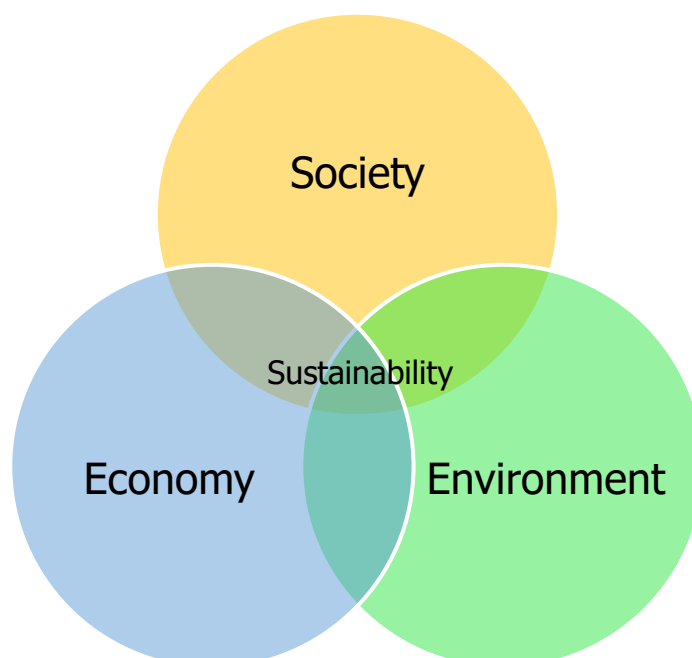


Figure N.1: Sustainable development

- N9. The Sandwell Local Plan is at the plan-making stage Regulation 19, known as ‘Publication’ in the Local Plan Regulations 2012⁴, as shown in Stage C of **Figure N.2**.

³ Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: <http://www.un-documents.net/our-common-future.pdf> [Date accessed: 28/08/24]

⁴ The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767

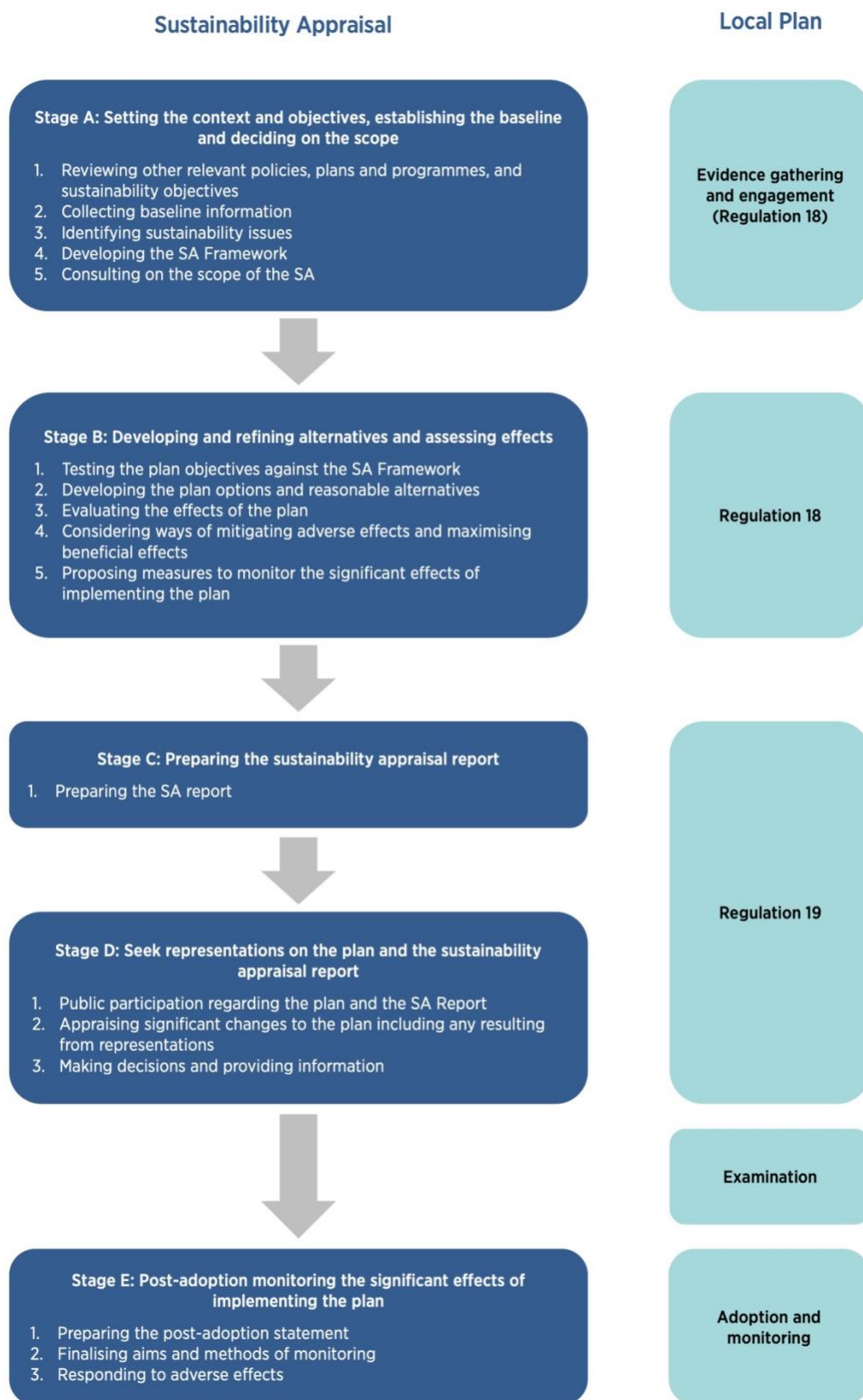


Figure N.2: Sustainability Appraisal and Local Plan process

Sandwell Metropolitan Borough

- N10. Sandwell is a metropolitan borough covering approximately 8,556ha, with a population of 341,900 according to the Census (2021)⁵. On average, Sandwell has a younger and more ethnically diverse population than the rest of the UK. Deprivation and inequalities are key issues for the local population, Sandwell is one of the most deprived local authorities in England with approximately 25.5% of children living in low-income families and life expectancy for both men and women lower than the national average.
- N11. Sandwell lies within the Black Country, which is a predominantly urban sub-region of the West Midlands. The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton. The location of Sandwell is shown in **Figure N.3**.
- N12. The strategic centre of Sandwell is West Bromwich, with several other main towns and centres including Bearwood, Blackheath, Cape Hill, Cradley Heath, Great Bridge, Oldbury and Wednesbury, alongside smaller towns and settlements. Sandwell's towns are well connected through a network of strategic transport routes, with links to other regional and national centres via the M5/M6 and rail corridors.
- N13. Industry and manufacturing form a key part of Sandwell's history, which continues in the local economy today as Sandwell is an important centre in particular for retail and wholesale, manufacturing, and health and social care sectors. Sandwell also plays a role within the wider economy in terms of electricity, gas and air conditioning as well as water supply and waste management, and transportation and storage industries. The borough also supports a range of parks and open spaces including the Rowley Hills and Sandwell Valley. The Sandwell Valley forms Sandwell's only area of Green Belt land.

⁵ Office for National Statistics (2022) How the population changed in Sandwell: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E08000028/> [Date accessed: 28/08/24]

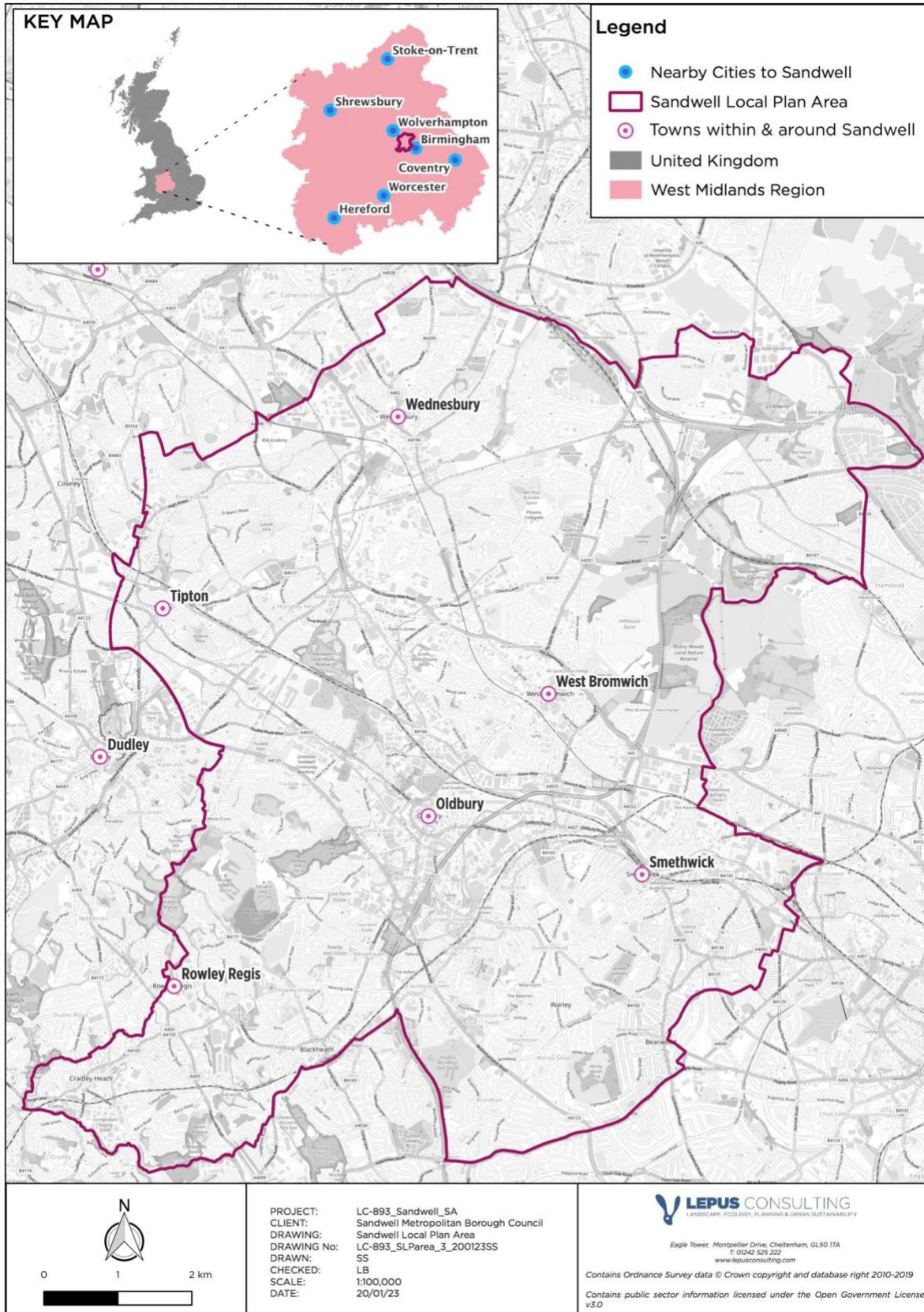


Figure N.3: Map of Sandwell Metropolitan Borough

The SA process alongside the Sandwell Local Plan

- N14. **Figure N.4** provides an overview of the stages that have been undertaken during the preparation of the Local Plan and the accompanying SA outputs and summarises the purpose and content of each.
- N15. Each stage included consultation with the statutory bodies for SA/SEA: Historic England, Natural England and the Environment Agency. Comments received were taken into consideration during the preparation of the SA outputs.

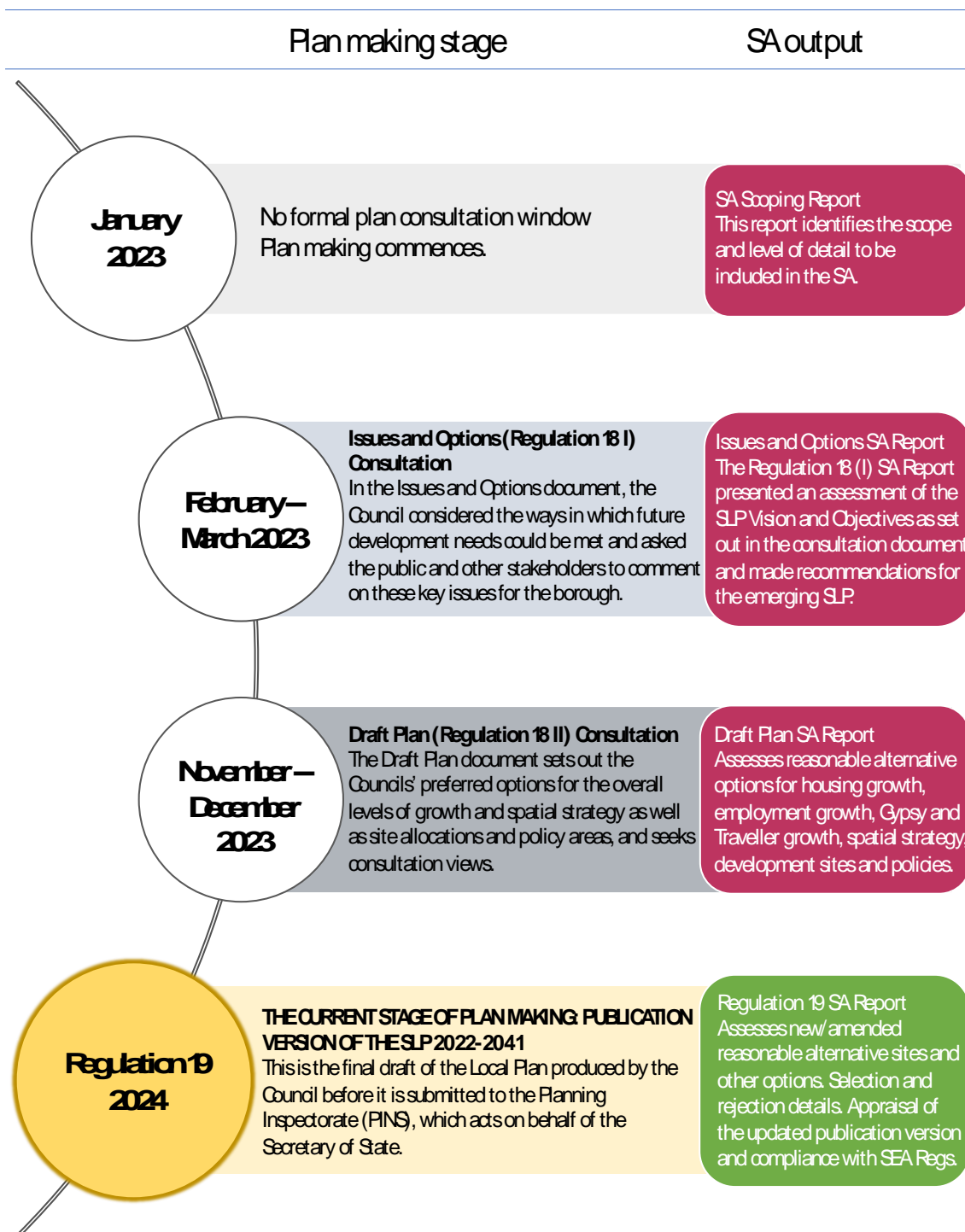


Figure N.4: Stages in the plan-making process accompanied by SA outputs

Scoping

- N16. The preparation of a Scoping Report was the first phase of the SA process. The scoping process set the criteria for assessment (including the SA Objectives) and established the baseline data including a review of relevant policies, programmes and plans (PPPs). The scoping process involved an overview of key issues, highlighting areas of potential conflict. The SA Scoping Report was prepared by Lepus Consulting in 2023⁶.
- N17. Between in February and March 2023, the content of the SA Scoping Report was consulted on with Historic England, Natural England, the Environment Agency and other relevant bodies. No specific comments were received regarding the SA Scoping Report.

Regulation 18

- N18. The Regulation 18 (I) Issues and Options SA Report (January 2023)⁷ identified options for the Vision and 11 draft Objectives for the SLP. The SA Report also set out a range of recommendations for SMBC to consider as the SLP is developed and refined, including recommendations to improve the SLP Vision and Objectives, as well as consideration of the identification, description and evaluation of reasonable alternatives which is an important aspect of this Regulation 18 (I) SA Report.
- N19. The Regulation 18 (II) Draft Plan SA report (October 2023)⁸ set out the appraisal of four spatial growth options alongside six housing growth options, four employment growth options, and three options for Gypsy and Traveller growth. These spatial options constitute reasonable alternatives for the distribution of new housing growth in the Plan area. Additionally, the Regulation 18 (II) SA included an assessment of 18 draft objectives for the SLP, 87 draft policies and 120 reasonable alternative sites. The SA report also set out the Council's preliminary reasons for selecting and rejecting reasonable alternative sites. Reasonable alternatives are discussed further within **Chapter 5** of the main report.

Regulation 19

- N20. The Regulation 19 SA Report (this report) includes a summary of the SA process to date and has been prepared to help inform the examination stage of the preparation of the SLP. The SA Report has been prepared to meet the requirements of an SEA Environmental Report. It also sets out the assessment of additional and amended reasonable alternative sites that have been identified by SMBC since the Regulation 18 stage. There are six housing growth options, four employment growth options, three Gypsy and Traveller growth options, four spatial growth options and 124 development sites which have been assessed throughout the SA process.

⁶ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report. Available at: <https://www.sandwell.gov.uk/downloads/file/896/sandwell-local-plan-issues-and-options-sustainability-appraisal-scoping-report> [Date accessed: 28/08/24]

⁷ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Issues and Options, January 2023. Available at: <https://www.sandwell.gov.uk/downloads/file/893/sandwell-local-plan-issues-and-options-sustainability-appraisal> [Date accessed: 28/08/24]

⁸ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 28/08/24]

2 Purpose and content of the Regulation 19 SA Report

The purpose of the Regulation 19 SA

- N21. The Regulation 19 SA Report has been prepared to summarise the SA process to date and help inform the examination stage of the preparation of the Local Plan. The Regulation 19 SA Report presents the findings of the sustainability appraisal of the Sandwell Local Plan, which is composed principally of 88 policies.
- N22. The purpose of the SA of the Local Plan is to:
- Identify, describe and evaluate the likely sustainability effects of the SLP proposals and their reasonable alternatives;
 - Inform the Council's decision making and preparation of the SLP; and
 - Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA.

Structure of the Regulation 19 SA Report

- N23. The SA of the Sandwell Local Plan is presented in three volumes:
- N24. **Volume 1: Non-Technical Summary** (NTS) (this document) provides a summary of the Regulation 19 SA.
- N25. **Volume 2: Main SA Report** contains the following chapters:
- **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out information about the SLP and the SA process to date.
 - **Chapter 3** presents the evolution of the environment without the SLP.
 - **Chapter 4** sets out the SA methodology.
 - **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
 - **Chapter 6** presents details on the preferred approach.
 - **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
 - **Chapter 16** presents the cumulative effects assessment.
 - **Chapter 17** sets out a range of monitoring recommendations for the SLP.
 - **Chapter 18** summarises ways in which the SA has influenced the SLP throughout the plan making process, including through recommendations made in the SA.
 - **Chapter 19** outlines the conclusions, residual effects and next steps.
- N26. **Volume 3: Appendices** provides further contextual information as follows:
- **Appendix A** presents a review of other relevant policies, plans and programmes (PPPs).

- **Appendix B** presents the SA Framework
- **Appendix C** presents the consultation responses received during each stage of the SA process from statutory consultees.
- **Appendix D** provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess policies, proposals, and reasonable alternatives.
- **Appendix E** presents the pre-mitigation assessment of 120 reasonable alternative sites.
- **Appendix F** presents the assessment of SLP policies.
- **Appendix G** considers the mitigating influence of SLP policies and presents the post-mitigation assessment of 120 reasonable alternative sites.
- **Appendix H** sets out SMBC's outline reasons for selecting and rejecting each of the reasonable alternative sites assessed in the SA process.

3 Baseline and key sustainability issues

Overview

- N27. The SEA Regulations requires the Environmental Report to present *"an outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes"*, *"the environmental characteristics of areas likely to be significantly affected"* and *"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance"*.
- N28. There are a number of plans, policies and programmes (PPPs) that set out the environmental protection objectives which proposals within the SLP should adhere to. These are discussed within the Scoping Report and are updated in **Appendix A**. Some examples of these include the NPPF and the Habitats Regulations, as well as regional or local guidance and strategies such as local transport initiatives, the Birmingham and the Black Country Biodiversity Action Plan and the Sandwell Biodiversity Net Gain Strategy.
- N29. PPPs that could potentially affect the SLP have been reviewed and considered alongside the current characteristics of the Plan area.
- N30. **Volume 2** (the main Regulation 19 SA Report) includes information relating to the baseline and key issues for the Local Plan area, drawing on information gathered during the Scoping stage, relating to the following sustainability topics (which incorporate the topics identified in Schedule 2 of the SEA Regulations⁹):
- Accessibility and transport
 - Air Quality;
 - Biodiversity, flora, fauna and geodiversity;
 - Climatic factors;
 - Cultural heritage;
 - Human health;
 - Landscape and townscape;
 - Population and material assets;
 - Water and soil resources.
- N31. An overview of each topic, including the key issues, is provided below.

Accessibility and transport

- N32. The accessibility and transport theme considers how new development would impact transport and accessibility, including increases in the levels of congestion experienced

⁹ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including *"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 interrelationship between the issues referred to in sub-paragraphs (a) to (l)."*

across the Plan area, and whether these developments have access to sustainable and active travel options.

- N33. Accessibility and transport have been considered in the SA assessments primarily within SA Objective 9 (Transport and accessibility).

Key issues relating to accessibility and transport

- ⇒ Although there is a high amount of traffic and cross-boundary movement to neighbouring authorities including Birmingham, Dudley, Walsall and Wolverhampton, 29.2% of Sandwell residents have no access to a car according to the 2021 Census.
- ⇒ Severance of active travel routes owing to Sandwell's location alongside the motorway network and the local conurbation has resulted in the landscape being dominated by local highway networks.
- ⇒ Access to transport can be a barrier to work, and for social wellbeing. Better access to shops, services, healthcare, education, entertainment, and other services is needed for all residents, and particularly for socially excluded groups.
- ⇒ There is a need to focus development within locations where there is good access to high quality public transport infrastructure, or the opportunity to provide it. Residential development in particular should be focused within walkable neighbourhoods where people can access local services on foot.
- ⇒ Better integration of, and connections between, different transport modes is required to facilitate sustainable and well-connected neighbourhoods. Public transport, park and ride and cycle hire schemes should be improved.

Air quality

- N34. The air quality theme considers the implications of new development for air pollution including the potential exposure of new residents to existing areas of poor air quality such as alongside the strategic road network and within Air Quality Management Areas (AQMAs).
- N35. 'Air quality' has been considered in the SA assessments primarily within SA Objective 7 (Pollution), and SA Objective 12 (Health).

Key issues relating to air quality

- ⇒ The borough's industrial character accompanied by the strategic network of local and major arterial roads, including the M5 and M6, has led to high traffic volumes and congestion, with adverse implications for air quality.
- ⇒ Sandwell AQMA covers the whole local authority area and the principal pollutant affecting air quality is nitrogen dioxide (NO₂), mostly sourced from road traffic. There is a need to ensure development avoids exacerbating air pollution issues in existing AQMAs and contributes to air quality improvement measures.
- ⇒ There is a need to ensure development proposals are designed in order to avoid any significant adverse impacts from pollution, including cumulative impacts, on human health and wellbeing, biodiversity, the effective operation of neighbouring land uses and the water environment.

Biodiversity, flora and fauna

- N36. The biodiversity and geodiversity theme considers how the proposed development would affect statutory and non-statutory biodiversity and geodiversity designations within Sandwell, including European sites¹⁰, Sites of Special Scientific Interest (SSSIs) Impact Risk Zones (IRZs), Sites of Importance for Nature Conservation (SINC), Sites of Local Importance for Nature Conservation (SLINC) Local Nature Reserves (LNR), Local Wildlife Sites (LWS), ancient woodland and priority habitats.
- N37. 'Biodiversity, flora and fauna' has been considered in the SA assessments primarily within SA Objective 3 (Biodiversity, Flora, Fauna and Geodiversity).
- N38. Likely significant effects of the Local Plan on European sites are explored in more detail in the Habitats Regulations Assessment (HRA) process.

¹⁰ These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive, and Special Protection Areas (SPAs) classified under the Birds Directive. Additionally, paragraph 181 of the NPPF (2023) requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated Habitats sites.

Key issues relating to biodiversity, flora and fauna

- ⇒ Growth promoted within the emerging SLP is likely to put pressure on biodiversity resources. There are potential impacts such as habitat fragmentation resulting from new development areas and recreational pressures on wildlife sites.
- ⇒ A number of Habitats sites, which are sensitive to changes in air quality, may be affected by changes in traffic generated by the SLP growth alone and in-combination with other plans and projects. The HRA of the SLP alongside a review of traffic modelling data will explore these potential effects in detail.
- ⇒ The SLP area is hydrologically connected to the Severn and the Humber Estuaries and their associated biodiversity designations. Habitats at these sites and migratory species of fish which use the wider catchment for phases of their lifecycle are sensitive to changes in water supply and quality which may be influenced by development proposals within the SLP. The HRA of the SLP will explore these potential effects in detail.
- ⇒ Careful consideration should be given during the plan-making process to the potential impacts on habitats and species of principle importance. The remaining areas of priority habitats within Sandwell should be protected from development and enhanced where possible.
- ⇒ There is a need to establish a coordinated and comprehensive GI network providing connectivity between biodiversity sites, green spaces, watercourses and other environmental features across the SLP area and wider Black Country.
- ⇒ Sandwell Valley supports a high level of ecological value, which may be lost or degraded as pressure increases for new development.

Climatic factors

- N39. The climate change theme considers the implications of new development on greenhouse gas (GHG) emissions, the extent and coverage of green infrastructure (GI), as well as fluvial, coastal and surface water flood risk.
- N40. 'Climate change' has been considered in the SA assessments primarily within SA Objectives 4 and 5 (Climate Change Mitigation and Adaptation), SA Objective 7 (Pollution), and SA Objective 12 (Health).

Key issues relating to climatic factors

- ⇒ Fluvial and surface water flooding pose significant risks to areas within Sandwell. Flash flooding, resulting from excessive overland flow or overtopping of minor watercourses, is a key issue and as such surface water run-off management and incorporation of effective sustainable drainage systems (SuDS) should be a priority for new developments within the borough. Climate change has the potential to increase the risk of flooding.
- ⇒ There is a need to increase the quality and quantity of GI within the SLP area, and the wider Black Country, to provide multi-functional benefits including improved carbon storage, urban cooling, natural flood resilience/flood water storage, and provide a more attractive public realm to encourage active travel.
- ⇒ New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change, and to increase low-carbon and renewable energy generation and usage throughout the SLP area.
- ⇒ A range of further risks linked to climate change may affect the SLP area. These include the following:
 - an increased incidence of heat related illnesses and deaths during the summer;
 - increased risk of injuries and deaths due to increased number of storm events and flooding;
 - adverse effects on water quality from watercourse levels and turbulent flow after heavy rain and a reduction of water flow;
 - loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
 - an increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for local business; and
 - increased drought and flood related problems such as soil shrinkages and

Cultural heritage

- N41. The cultural heritage theme considers how the proposed development would affect statutory and non-statutory cultural heritage assets including Listed Buildings, Registered Parks and Gardens (RPGs), Scheduled Monuments (SMs) and Conservation Areas, as well as the wider historic environment and non-designated assets such as archaeology.
- N42. 'Cultural heritage' has been considered in the SA assessments primarily within SA Objective 1 (Cultural Heritage).

Key issues relating to cultural heritage

- ⇒ Development promoted through the emerging SLP may have the potential to cause adverse effects on historic landscapes and lead to damage to archaeological sites, monuments and buildings and / or their settings.
- ⇒ There are six heritage assets listed on the Heritage at Risk register within the SLP area which should be protected from inappropriate development and require improved management.
- ⇒ There is a need to promote innovative re-use of existing building stocks. The SLP should seek to improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering their retention and re-use, versus their replacement.
- ⇒ Archaeological remains, both seen and unseen, have the potential to be adversely affected

Human health

- N43. The human health theme considers the potential for sustainable access to healthcare facilities (GP surgeries and NHS hospitals), leisure centres and green spaces for new residents.
- N44. 'Health' has been considered in the SA assessments primarily within SA Objectives 12 (Health) and 11 (Equality), although there is some overlap with other objectives such as SA Objective 7 (Pollution) in terms of the implications of poor air quality for human health and wellbeing.

Key issues relating to human health

- ⇒ As all the proposed development within the SLP will be located within an AQMA, this is likely to lead to adverse impacts on health, without intervention.
- ⇒ Residents in Sandwell experience significant inequalities in health, with residents having a lower life expectancy and experiencing illness and disability at a younger age on average, compared to other parts of England.
- ⇒ The increasing population in Sandwell is likely to place pressure on the capacity of health infrastructure and leisure facilities, which will need careful planning.
- ⇒ Anti-social behaviour is an issue within some of Sandwell's green spaces according to the Green Space Strategy, which may discourage their use by the local community. There is a need to establish greater management and maintenance of green spaces, and support more local involvement.

Landscape

- N45. The landscape theme considers how the proposed development would integrate with existing local character and potential effects on views. Sandwell has a strong urban

character with open green spaces, such as parks, and designated and non-designated sites dispersed across the borough and also including a section of Green Belt.

- N46. 'Landscape' has been considered in the SA assessments primarily within SA Objective 2 (Landscape).

Key issues relating to landscape and townscape

- ⇒ The north east of Sandwell lies within the West Midlands Green Belt. Parts of land in this area, within the Sandwell Valley, are identified as being of 'moderate' or 'moderate-high' landscape sensitivity.
- ⇒ There is a risk that the need for new housing development could increase the risk of encroachment into the remaining undeveloped areas of the borough or alter the character, tranquility and sense of place in suburban settlements. This includes the Rowley Hills, in the south west of the borough.
- ⇒ There is a need for new development to be in accordance with the scale and character of the local area and seek to conserve and enhance the quality of the surrounding landscape or townscape.

Population and material assets

- N47. The population theme considers the implications for new development on meeting housing and employment needs, addressing inequalities and providing access to jobs and services. Material assets include a variety of built assets including healthcare, schools and essential infrastructure, as well as mineral resources and other natural assets. Together these themes seek to create places where residents have good access to services to meet their day-to-day needs, supporting a healthy and vibrant population.
- N48. 'Population and material assets' has been considered in the SA assessments across a number of SA Objectives including 4 and 6 (Waste and Natural Resources), 9 (Transport and Accessibility), 10 (Housing), 11 (Equality), 12 (Health), 13 (Economy) and 14 (Education, Skills and Training).

Key issues relating to population and material assets

- ⇒ Sandwell's residents have on average lower qualification levels and employment rates compared to the West Midlands and Great Britain.
- ⇒ There is a need to increase the proportion of waste sent for reuse, recycling or composting and move away from the use of landfill for waste disposal.
- ⇒ Sandwell is ranked as the 12th most deprived local authority in England. There is a need to support strong, vibrant and healthy communities by:
 - Providing the supply of housing required to meet the needs of present and future generations;
 - Creating a high-quality built environment, with accessible local services that reflect the community's needs and support health, social and cultural wellbeing;
 - Creating a strong sense of place by strengthening the distinctive and cultural qualities of towns and villages; and
 - Creating safe and accessible environments where crime, disorder and the fear of crime do not undermine quality of life or community cohesion.
- ⇒ Due to Sandwell's demography and urban structure, the population was hit hard by the COVID-19 pandemic, most notably its central corridor of older, poor-quality housing and communities from ethnic minority backgrounds, where infection rates were highest. The pandemic has deepened hardship and inequality in an already deprived area, with high reliance on Universal Credit, increased mental health issues and educational disruption.

Water and soil resources

- N49. The water theme considers the implications of new development on water quality and quantity, and on soil resources (including agriculturally valuable 'best and most versatile' (BMV) land).
- N50. 'Water and soil resources' has been considered in the SA assessments primarily within SA Objectives 6 (Natural Resources) and 7 (Pollution).

Key issues relating to water and soil resources

- ⇒ Soil is a non-renewable resource that will continue to be lost as a result of new development proposed within the emerging SLP as well as supporting infrastructure. The majority of land in the SLP area is ALC 'urban', with pockets of ALC Grade 3 and 4, which may be under threat from new growth areas and associated infrastructure.
- ⇒ New development and an increased population is likely to place pressure on water resources and may result in a deficit between supply and demand if not carefully planned and managed alongside the water companies.
- ⇒ There is a need to give close consideration to the impacts of development proposals on wastewater treatment in the local area, and the capacity of treatment works, as well as the consequences of new wastewater generation for local water quality and the ecological status of ground and surface water bodies.
- ⇒ Culverted watercourses have the potential to become blocked by debris during periods of heavy or sustained rainfall. They also offer little biodiversity or recreational interest relative to more natural watercourses. In such cases, environmental and water quality benefits can be secured at minimal cost.
- ⇒ Most forms of development reduce the amount of rainfall that is intercepted by vegetation on the ground and can have detrimental implications for surface water run-off.

4 Evolution of the environment without the Local Plan

- N51. The SEA Regulations requires the Environmental Report to present *"information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"*.
- N52. In the absence of the SLP, no new plan-led development would occur within the Plan area over and above that which is currently proposed in the adopted Core Strategy¹¹ and SAD¹². In this scenario, an appeal-led system would predominate. The nature and scale of development that may come forward under an appeal-led system would be uncertain. In a 'no plan' scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place.
- N53. **Table N.2** considers the likely evolution of the baseline within Sandwell in the absence of the Local Plan. This takes into account information gathered at the Scoping stage as well as more up-to-date data and statistics.

Table N.1: Likely evolution without the Sandwell Local Plan

Theme	Likely evolution without the Plan
Air	<ul style="list-style-type: none"> Sandwell Air Quality Management Area (AQMA) covers the whole local authority area and the principal pollutant affecting air quality is nitrogen dioxide (NO₂), mostly sourced from road traffic. Continuing to monitor air quality, especially within AQMAs, and implementation of measures outlined in Air Quality Action Plans will ensure that objectives are in place to decrease exceedances over time. Traffic and congestion are likely to increase with population growth, with implications in particular for air quality, residents and wildlife. Although national trends suggest there is an increasing uptake of lower emission vehicle types which will be likely to help limit road transport associated emissions in the SLP area, in absence of the plan there may be reduced scope to implement and monitor effective policies and strategies which can facilitate alternative transport modes and encourage behavioural changes to improve air quality.
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Sites designated for their national and international biodiversity and/or geodiversity value would continue to benefit from legislative protection. The NPPF and its policies relating to biodiversity would continue to be material considerations in planning decisions. As of February 2024, mandatory biodiversity net gain (BNG) has come into force for Town and Country Planning Act developments, although without the SLP there may be more limited opportunity to strive for higher BNG targets or other biodiversity enhancement measures. Without the SLP there may be less opportunity to establish a strategically planned green infrastructure (GI)

¹¹ Sandwell Metropolitan Borough Council (2011) Black Country Core Strategy. Available at: <https://www.sandwell.gov.uk/downloads/download/347/black-country-core-strategy> [Date accessed: 28/08/24]

¹² Sandwell Metropolitan Borough Council (2012) Site Allocations Document. Available at: <https://www.sandwell.gov.uk/downloads/download/348/site-allocations-and-delivery-development-plan-document-sad-and-policies-map> [Date accessed: 28/08/24]

Theme	Likely evolution without the Plan
	<p>network across Sandwell, and/or potential habitat banks for delivering compensatory BNG off-site, where on-site delivery is proved to be unviable.</p> <ul style="list-style-type: none"> It may be difficult to ensure that development is of appropriate type, scale and location to avoid adverse impacts on either biodiversity/geodiversity designations (of international or local significance) or on the functioning ecological network of Sandwell and the wider area and the various essential ecosystem services this provides, without the SLP.
Climatic factors	<ul style="list-style-type: none"> Climatic and anthropogenic-induced climate change are increasing concerns nationally and globally. Without a clear strategy to reduce emissions across all sectors at the local level, Sandwell’s contributions towards the causes of climate change may be exacerbated, particularly policies and strategies to facilitate and encourage a modal shift away from private car use. In absence of a clear growth strategy implemented through the SLP, a less sustainable development pattern could result within Sandwell which could potentially result in an increased need to travel, with associated increases in GHG emissions. Technological advances, which may include renewable energies, electric vehicles, and efficient electricity supplies, would be expected to occur over time in the UK energy market. However, there may be less opportunity to seek aspirational targets regarding improving energy efficiency within developments in association with meeting the target of carbon neutrality by 2050, in the absence of the SLP. The risk of flooding will be likely to increase over time due to the changing climate, increasing the occurrence of extreme weather events. Although national policies and legislation will continue to restrict uses within flood zones, without the SLP there may be less control over the location of growth which could limit the effectiveness of strategic GI networks and natural water management functions.
Cultural heritage	<ul style="list-style-type: none"> National and local guidance seeks to protect designated assets and their settings such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens, which would continue with or without the SLP. The Heritage at Risk Register will continue to be managed by Historic England who will continue to work with stakeholders to protect these assets, although there could be less opportunity to focus on regeneration and investment without the SLP. It is uncertain if connectivity with places, local distinctiveness and culture would be emphasised and protected in the absence of the plan, as it is anticipated that the SLP will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.

Theme	Likely evolution without the Plan
Human health	<ul style="list-style-type: none"> • Sandwell’s population is expected to continue to increase, which is likely to place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. • The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services. It may be more difficult to ensure these needs are met in absence of the plan. • Without a clear plan-led development strategy, it is uncertain if existing public green spaces and open spaces would be maintained or enhanced to encourage residents to live healthy and active lifestyles. Existing open spaces may be under greater pressure from windfall development without the SLP.
Landscape	<ul style="list-style-type: none"> • The West Midlands Green Belt will continue to benefit from legislative protection. • In the absence of Plan-led development, there may be less opportunity to promote the conservation and enhancement of the local landscape / townscape character. There could potentially be a rise in the quantity of new development which discords with the local character by altering the style and scale of development, depending on the nature of any future changes to national regulations, such as the proposed revisions to the NPPF and potential implementation of mandatory design codes promoted in the Levelling Up and Regeneration Act.
Population and material assets	<ul style="list-style-type: none"> • The borough’s population is forecast to increase by 30,300 between 2016 and 2030¹³, leading to the potential for secondary effects. Without plan-led development, there may be less scope to manage and implement sufficient health, education, social and transport infrastructure to meet local needs and address inequalities. • It is uncertain if future housing provision would satisfy local needs in terms of type, cost and location. There is likely to be a continued increase in the cost of buying or renting housing, although the rate of increase may reduce compared to previous years, in line with national trends. It is uncertain whether affordable housing needs would be met. • Without the influence of the SLP, there would be less planning control over the location of housing with potential for new housing being allowed in unsustainable locations and/or without necessary supporting infrastructure. • Without plan-led development it is likely that housing shortages will be exacerbated. This could lead to existing residents who wish to form new households living in overcrowded conditions or being forced to move outside the area, and potential new residents being unable to move in. • Without a clear plan-led strategy to focus the limited amount of investment into centres and to defend against further investment in out-of-centre locations, the vitality of Sandwell’s centres may decline. This could lead to a less sustainable development pattern resulting in an increased need to travel, with associated increases in GHG emissions and potentially exacerbating issues with social exclusion and access to key services. • The overall number of jobs and businesses operating within Sandwell may continue to increase; however, there may be less planning control over the

¹³SMBC (2018) Sandwell Trends: Population Projection Release. Available at: <https://www.sandwelltrends.info/news/population-projection-release/> [Date accessed: 20/08/24]

Theme	Likely evolution without the Plan
	<p>location of employment land and there may be limited job availability in some sectors if land is not allocated through the SLP.</p> <ul style="list-style-type: none"> • There is likely to be an increase in the proportion of the road transport fleet which are electric or hybrid vehicles, in line with national trends. Over time, there is likely to be a rise in car ownership in general. • The Local Transport Plan will still be implemented, which would be likely to have a positive impact on Sandwell’s road network, seeking to relieve congestion and improve provision of public transport across the plan area. Although, in absence of the SLP there may be reduced scope to implement and monitor effective policies and strategies which can facilitate alternative transport modes and encourage behavioural changes.
Soil	<ul style="list-style-type: none"> • Soil is a non-renewable resource that would be likely to continue to be lost. Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of agriculture and climate change.
Water	<ul style="list-style-type: none"> • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the Humber and Severn RBMPs, WRMP and CAMS in line with the Water Framework Directive. However, without plan-led development, there could potentially be new developments that result in over-capacity issues at wastewater treatment works (either cumulatively or individually). • In the absence of plan-led development, the efficiency and sustainability of water consumption may be unlikely to improve as the local population grows and increases water demand, depending on the nature of any future changes to national regulations, such as the Building Regulations and any emerging policy / regulations relating to water neutrality.

5 SA methodology

The SA Framework

- N54. Taking into consideration the key issues identified above, an SA Framework was established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared.
- N55. SA Objectives and indicators can be revised as further baseline information is collected, and sustainability issues and challenges are identified, and are used in monitoring the implementation of the Plan.
- N56. The full SA Framework used throughout the SA process including indicators is presented in **Appendix B**, with a summary of the 14 SA Objectives shown in **Table N.3**. It should be noted that the order of SA Objectives does not infer any prioritisation.

Table N.2: SA Framework summary

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Cultural heritage
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	Landscape, cultural heritage
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	Climate change mitigation: Minimise Sandwell’s contribution to climate change.	Climatic factors
5	Climate change adaptation: Plan for the anticipated levels of climate change.	Climatic factors, soil and water
6	Natural resources: Protect and conserve natural resources.	Soil, water and material assets
7	Pollution: Reduce air, soil, water and noise pollution.	Air, water, soil and human health
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	Population and material assets
9	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.	Climatic factors, population and material assets
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	Population
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	Health: Safeguard and improve community health, safety and wellbeing.	Human health and population
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

Significant effects

- N57. A single value from **Table N.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.
- N58. The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: "*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table N.3: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal will be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<ul style="list-style-type: none"> • The size, nature and location of development proposals will be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts will be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal is likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal is likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- N59. Limitations, assumptions and topic-specific methodologies applied in the SA are discussed in further detail within **Chapter 4** of the Regulation 19 SA Report (**Volume 2**) and **Appendix D (Volume 3)**.

6 Reasonable alternatives

Preface

- N60. The SEA Regulations state as part of the requirements for preparing an environmental report, that the local plan making process must identify, describe, and evaluate reasonable alternatives that have been considered.
- N61. There is no precise guide as to what constitutes a 'reasonable alternative'. SMBC have identified reasonable alternatives for the SLP at different stages of the plan making process, including different types of reasonable alternatives, for example, different options to meet the required growth such as housing growth options, employment growth options, policies and reasonable alternative sites.
- N62. The SA has assessed reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is the Council's role to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the SLP and which to 'reject' from further consideration.
- N63. In the case of the SLP, all reasonable alternatives have been identified and described by the Council's plan makers. **Figure N.5** below outlines the definitions for the different types of reasonable alternatives assessed throughout the SA process.
- N64. **Figure N.6** summarises the reasonable alternatives considered throughout the plan-making process, and where these alternatives have been identified, described and evaluated.



Figure N.5: Definitions for the different types of reasonable alternatives assessed in the SA process

Quick guide to reasonable alternatives

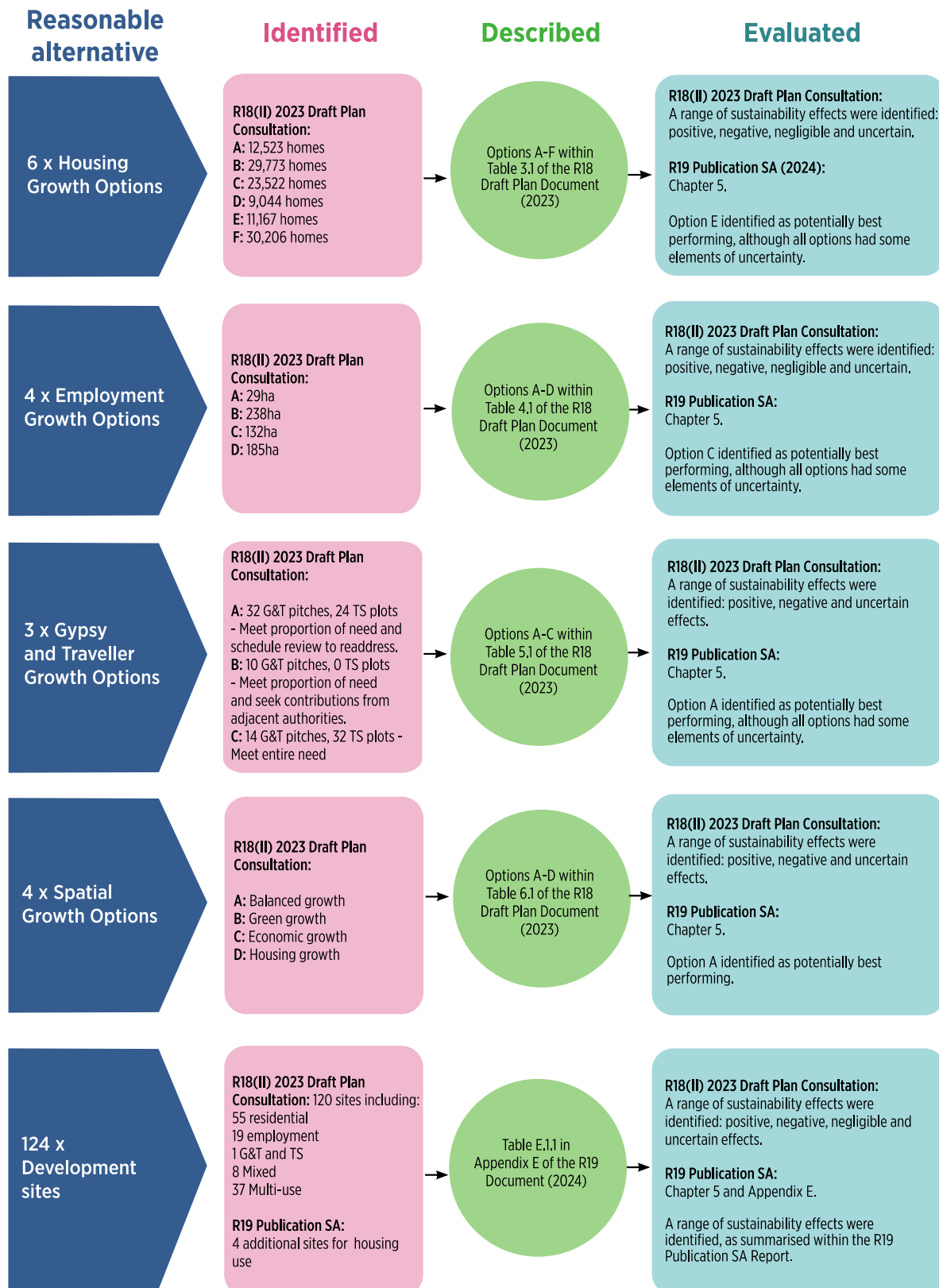


Figure N.6: The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process

Housing growth options

N65. Six high level options for the overall quantity of housing growth to be delivered through the SLP were assessed within the Draft Plan SA Report¹⁴ (Regulation 18(II), 2023). These options include numbers based on different sources to provide an illustration of how the SLP could address the borough’s housing need in a realistic manner.

N66. The six residential growth options are summarised in **Table 5.1**.

Table N.4: Housing growth options identified by SMBC (see Regulation 18 (II) Draft Plan SA Report 2023)

Option	Description
A	Meet a proportion of housing need across plan period (2022-2041) based on average annual levels of delivery for last 10 years (do nothing). <ul style="list-style-type: none"> • 12,523 dwellings between 2022-2041 • A minimum average yearly requirement of 659 dwellings throughout the plan period
B	Meet entire housing need identified through Standard Method across plan period (2022-2041): based on 2014 household projections (using 2022 affordability ratio). <ul style="list-style-type: none"> • 29,773 dwellings between 2022-2041 • A minimum average yearly requirement of 1,567 dwellings throughout the plan period
C	Meet entire housing need identified through Standard Method across plan period (2022-2041): based on 2021 census figures (based on increase in households of 7.2% ¹⁵). <ul style="list-style-type: none"> • 23,522 dwellings between 2022-2041 • A minimum average yearly requirement of 1,238 dwellings throughout the plan period
D	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC). <ul style="list-style-type: none"> • 9,044 dwellings between 2022-2041 • A minimum average yearly requirement of 476 dwellings throughout the plan period
E	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) plus aspirational growth in the Regeneration Areas and Centres and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC). <ul style="list-style-type: none"> • 11,167 dwellings between 2022-2041 • A minimum average yearly requirement of 588 dwellings throughout the plan period
F	Meet housing need (Standard Method 2014 and 2022 affordability ratio) and contribute 2,000 houses to wider HMA needs. <ul style="list-style-type: none"> • 30,206 dwellings between 2022-2041 • A minimum average yearly requirement of 1,590 dwellings throughout the plan period

N67. **Table 5.2** summarises the SA findings. The assessments are presented in full within the Regulation 18(II) Draft Plan SA (2023)¹⁶.

¹⁴ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

¹⁵ 2021 Census showed number of households in Sandwell increased by 7.2% since 2011

¹⁶ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

Table N5: Summary SA findings for assessment of housing growth options A-F

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	+/-	-	-	-	+/-	-	-	-	+	+	-	+	+	+
B	+/-	--	--	--	+/-	--	--	--	-	++	+/-	-	+	-
C	+/-	--	--	--	+/-	--	--	--	-	+	-	-	+	-
D	+/-	0	-	-	+/-	-	-	-	+	+	-	+	+	+
E	+/-	0	-	-	+/-	-	-	-	+	+	-	+	+	+
F	+/-	--	--	--	+/-	--	--	--	-	++	+/-	-	+	-

N68. Option E is identified as the best performing option overall, assuming that a large proportion of growth under this option would be on previously developed land and within the existing centres, with the benefits in terms of regeneration meaning this option slightly out-performs Option D, although neither option would deliver sufficient housing to satisfy the identified need.

Employment growth options

N69. Four options for employment growth were assessed within the Draft Plan SA Report¹⁷ (Regulation 18(II), 2018), as shown in **Table 5.3**.

N70. Sandwell is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Dudley, Walsall and Wolverhampton. The Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR) are the key pieces of evidence relating to employment land need and supply. The EDNA (2022)¹⁸ and 2023 update¹⁹ identified an estimated demand of 185ha of employment land in the district for the Plan period, although neighbouring authorities may have a role to play in helping to satisfy the employment shortfall through the Duty to Co-operate.

¹⁷ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

¹⁸ WECD (2022) Economic Development Needs Assessment 2022-2040 for the Black Country Authorities. Available at: <https://www.sandwell.gov.uk/downloads/file/1542/black-country-economic-development-needs-assessment-edna-2022> [Date accessed: 23/05/24]

¹⁹ WECD (2023) Economic Land Needs Assessment 2020-2041 for the Black Country Authorities, August 2023. Available at: <https://www.sandwell.gov.uk/downloads/file/1546/black-county-authorities-employment-land-needs-assessment-2020-2041-august-2023-> [Date accessed: 23/05/24]

Table N.6: Employment growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)

Option	Description
A	Rely on existing vacant employment land supply (do nothing). <ul style="list-style-type: none"> A minimum of 29ha between 2022-2041
B	Provide for highest estimate of need (EDNA) <ul style="list-style-type: none"> A minimum of 238ha between 2022-2041
C	Provide for lowest estimate of need (EDNA) <ul style="list-style-type: none"> A minimum of 132ha between 2022-2041
D	Provide for mid-range estimate of need (EDNA August 2023 update) <ul style="list-style-type: none"> A minimum of 185ha between 2022-2041

N71. **Table 5.4** summarises the SA findings. The assessments are presented in full within the Regulation 18(II) Draft Plan SA (2023)²⁰.

Table N.7: SA performance of the employment growth options (see the R18 (II) Draft Plan SA Report, 2023)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Employment Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	+/-	0	0	-	+/-	+	-	+/-	+/-	0	-	0	+	+
B	+/-	-	-	-	+/-	-	-	+/-	+/-	0	+/-	-	++	+
C	+/-	-	-	-	+/-	-	-	+/-	+/-	0	+/-	-	++	+
D	+/-	-	-	-	+/-	-	-	+/-	+/-	0	+/-	-	++	+

N72. Overall, Option C could be considered as the best performing against all the objectives collectively as it provides enough land to meet the lower estimate of need, performs well against the economic objectives, and although having negative impacts against the environmental objectives, would likely have less of an impact than Option B.

Gypsy and Traveller growth options

N73. The Black Country Gypsy and Traveller Accommodation Assessment (GTAA)²¹ assessed accommodation needs for Gypsies, Travellers and Travelling Showpeople across Sandwell and the wider Black Country. The GTAA (2022) identified a need for 14 pitches and 32 plots in Sandwell.

²⁰ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

²¹ RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Available at: <https://www.sandwell.gov.uk/downloads/file/1558/black-country-gtaa-april-2022-> [Date accessed: 23/05/24]

N74. Three options for Gypsy, Traveller and Travelling Showpeople (GTTS) growth have been identified by SMBC (see **Table 5.5**).

Table N.8: *Gypsy, Traveller and Travelling Showpeople growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)*

Option	Description
A	Meet a proportion of housing need across part of the plan period (2025-2030) and schedule an early review of the SLP to readdress need across later stages. <ul style="list-style-type: none"> A minimum of 8 Gypsy and Traveller pitches and 24 Travelling Showpeople plots
B	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC). <ul style="list-style-type: none"> A minimum of 10 Gypsy and Traveller pitches and 0 Travelling Showpeople plots
C	Meet entire need. <ul style="list-style-type: none"> A minimum of 14 Gypsy and Traveller pitches and 32 Travelling Showpeople plots

N75. **Table 5.6** summarises the likely impacts of each GTTS growth option in relation to the 14 SA Objectives. The assessments are presented in full in the Regulation 18 (II) SA Draft Plan²².

Table N.9: *SA performance of the Gypsy, Traveller and Travelling Showpeople growth options (see the R18 (II) Draft Plan SA Report, 2023)*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Gypsy and Traveller Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	+/-	-	-	+/-	-	-	-	-	-	+	+/-	+/-	+	+/-
B	+/-	-	-	+/-	-	-	-	-	-	-	+/-	+/-	+	+/-
C	+/-	-	-	+/-	-	-	-	-	-	++	+/-	+/-	+	+/-

N76. Option A could be identified as best performing overall as it provides for a proportion of both the Gypsy and Traveller and Travelling Showperson needs but also has lower potential for adverse impacts across the other SA Objectives than Option C. However, it should be acknowledged that since Option A proposes to "schedule an early review of the SLP to readdress need across later stages", there is some uncertainty regarding the longer-term effects.

²² Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

Spatial growth options

- N77. Four spatial growth options were assessed within the Draft Plan SA Report²³ (Regulation 18(II), 2018), as shown in **Table 5.7**. These options consider how the overall number of homes and area of employment land (and other types of land use where applicable) could be strategically distributed, thus helping to meet some of the strategic aims of the emerging SLP.
- N78. Given Sandwell’s highly urbanised nature with very little vacant or unused open spaces, and the importance of the existing open and green spaces for environmental and human health, the Council is limited in the number of approaches it can take to accommodate growth.

Table N.10: Spatial growth options identified by SMBC (see the R18 (II) Draft SA Report, 2023)

Option	Description
A – Balanced Growth	<ul style="list-style-type: none"> Focus most new growth within the existing residential and employment areas of Sandwell; Continue to deliver most new development on previously developed land and sites; Take advantage of existing and improved infrastructure capacity to maximise development on new sites Make improvements to/allowances for the environmental, climate change, accessibility and socio-economic capacity of existing residential and employment areas; Examine the potential for providing housing/employment development on areas of vacant and underused open spaces and undeveloped land within the urban areas; Protect areas of designated habitat and ecological value; Protect the historic and archaeological environment and areas with geological and landscape value.
B – Green Growth	<ul style="list-style-type: none"> Restrict new development to brownfield and previously developed sites; Promote the use of zero- and low-carbon designs, building techniques, materials and technologies in all new development; Only allocate housing in locations with the highest levels of sustainable transport access to residential services (retail provision, schools, healthcare facilities, fresh food, employment etc.); Only allocate new employment land where sustainable access and good public transport links available; Redevelop existing housing and employment areas to deliver cleaner, more energy-efficient and more intensive areas of growth; Maximise climate change adaptation and mitigation through the creation, protection and improvement of parks, woodland and tree planting, open spaces, landscapes and habitats across the borough; Protect open spaces and areas of habitat and ecological value within and beyond the urban areas; Create additional public open spaces to serve new housing developments;

²³ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

Option	Description
	<ul style="list-style-type: none"> Protect the historic and archaeological environment and areas with geological and landscape value.
<p>C – Economic Growth</p>	<ul style="list-style-type: none"> Retain, protect and enhance all types of local employment land; Intensify the use of existing employment areas through redevelopment and redesign of existing areas and infrastructure improvements; Explore the redevelopment of retail and other commercial areas in town centres to provide additional employment sites; Allocate employment sites on derelict/vacant open space within the urban area; Identify and allocate areas with the potential to deliver larger employment sites via site assembly; Locate new housing and services, facilities and infrastructure to serve existing and proposed employment areas; Protect areas of designated habitat and ecological value; Protect the historic environment, including areas with industrial design and archaeological interest, and areas with geological and landscape value.
<p>D – Housing Growth</p>	<ul style="list-style-type: none"> Focus new growth within the existing residential and employment areas of Sandwell; Continue to deliver most new development on previously developed land and sites; Examine the potential for providing housing development on areas of vacant and underused open spaces and undeveloped land within the urban areas; Redevelop areas of existing older housing to provide higher density and energy-efficient new housing; Reallocate areas identified for employment land provision for additional housing development; Allocate new housing on urban sites around transport hubs/nodes and in towns and local centres, including the use of tall buildings in appropriate locations; Increase overall housing densities to 100 dph in centres and 45 dph outside centres and meet capacity gaps in associated residential services e.g. schools, healthcare, leisure/recreation, infrastructure; Protect areas of designated habitat and ecological value; Protect the historic and archaeological environment and areas with geological and landscape value.

N79. Each option has been assessed using the SA Framework and summary findings are presented in **Table 5.8**. The assessments are presented in full in the Regulation 18 (II) SA Draft Plan²⁴.

Table N.11: SA performance of the Spatial growth options (see the R18 (II) Draft Plan SA Report, 2023)

²⁴ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023. Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Spatial Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	-	-	+	+	+	-	-	+	+	+	+	-	+	+/-
B	-	+	++	++	++	+	+	+/-	++	+	+/-	+	+	+
C	-	-	+/-	+/-	+/-	-	-	-	+	+	+/-	-	++	+/-
D	-	-	+/-	+	+	-	-	-	+	+	+/-	-	-	++

N80. Overall, it appears Option B performs best against the largest number of SA Objectives; it reduces the impacts on the environment whilst providing residential and employment growth. However, it is not clear exactly what level of growth this option would support as the quantities of housing or employment development that could be attained under this option are not known. As such, it may be a refinement of this option provides the best option overall.

Evaluation of reasonable alternative sites

N81. The identification, description and evaluation of development sites has taken place throughout the plan making process at different stages.

N82. SMBC have undertaken a filtering process (or 'gateway check') of all potential sites identified through the evidence base in order to determine which sites should be considered as reasonable alternatives for the purpose of the SA. If the following receptors were obviously present at a site, the Council have generally rejected such sites from inclusion:

- Ancient Hedgerows
- Ancient Woodland/Veteran Tree
- Common Land
- Flood Zone 3
- Green Belt
- Health and Safety Executive (HSE) Zone 1 (for residential)
- Local Nature Reserve (LNR)
- Operational Burial Grounds
- Registered Park & Garden (RPG)
- Scheduled Monument (SM)
- Site of Importance for Nature Conservation (SINC)
- Site of Special Scientific Interest (SSSI) / Special Area of Conservation (SAC)
- Strategic Open Space

N83. Sites were also filtered out where the landowner has expressed unwillingness, or sites with one or more significant planning constraints which cannot be mitigated.

- N84. Through undertaking this filtering process, a total of 124 reasonable alternative development sites have been identified by SMBC and considered throughout the SA process.
- N85. The Regulation 18 (II) SA Report (2023)²⁵ included an assessment of 120 reasonable alternative sites identified by the Council, comprising:
- 55 residential-led sites
 - 19 employment-led sites;
 - One Gypsy, Traveller and Travelling Showperson site;
 - Eight sites for mixed use; and
 - 37 sites for multiple uses.
- N86. The Regulation 19 SA Report (this report) includes an assessment of four additional reasonable alternative sites proposed for housing use, identified by the Council since the previous stage (see **Appendix E** of **Volume 3**). In addition to these four sites, the Council has provided updated information for the use of 36 reasonable alternative sites assessed at the Regulation 18 (II) stage, and boundary changes for four sites including SH16, SEC3-133, SM7 and SM8.
- N87. A total of 124 sites have therefore been assessed across the SA process as follows:
- 84 residential-led sites;
 - 28 employment-led sites;
 - One Gypsy, Traveller and Travelling Showperson site;
 - Eight sites for mixed use; and
 - Two sites for multiple use.
- N88. The SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA Framework.
- N89. Negative impacts were mainly identified in relation to issues associated with air quality due to the proximity of reasonable alternative sites to the borough's major roads and the location of all development within Sandwell AQMA; the likely impact on the borough's carbon footprint associated with the construction and occupation of new development; loss of undeveloped land and/or land with potential environmental value; proposed development within areas of surface water flood risk; potential adverse effects on Sites of Local Importance for Nature Conservation (SLINCs) especially where development sites coincide or are located adjacent to these designations; and sites located in deprived areas with potential to exacerbate inequalities without careful planning.
- N90. Positive impacts were identified in relation to the provision of new housing and employment floorspace which would contribute towards meeting the identified needs; benefits to health and accessibility as many reasonable alternative sites are located within sustainable distance to NHS hospitals, GP surgeries and public green spaces; sustainable

²⁵ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan – Regulation 18: Draft Plan, October 2023.
Available at: <https://sandwell.oc2.uk/document/9> [Date accessed: 21/05/24]

accessibility to schools and public transport including railway and bus services; and the majority of sites being located within Flood Zone 1 where fluvial flood risk is low.

N91. All reasonable alternative sites which have been considered at the Regulation 19 stage (120 sites following the removal of four reasonable alternative sites as explained in **Appendix H**) have been assessed pre-mitigation in terms of potential impacts on each SA Objective as seen in **Table N.13** below, the results of which are presented in their entirety in **Appendix E**.

Table N.12: Summary of pre-mitigation reasonable alternative site assessments (extracted from **Appendix E**)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
SEC3-181	0	+/-	+/-	+/-	-	+	-	+/-	++	0	0	++	+/-	0
SEC4-1	-	+/-	+/-	+/-	--	-	-	+/-	++	0	-	-	+/-	0
SEC3-9	0	+/-	-	+/-	--	+	-	+/-	++	0	-	++	+/-	0
SEC3-99	-	+/-	-	+/-	-	+	-	+/-	++	0	0	++	+/-	0
SH1	0	+/-	+/-	0	+	+	-	0	++	+	0	-	++	-
SEC3-113	0	+/-	+/-	+/-	-	+	-	+/-	++	0	-	++	+/-	0
SEC3-46	0	+/-	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
SEC3-175	-	+/-	+/-	+/-	+	+	-	+/-	++	0	0	++	+/-	0
SEC3-36	0	+/-	-	+/-	-	+	-	+/-	++	0	0	++	+/-	0
SEC3-29	0	+/-	+/-	+/-	-	-	-	+/-	-	0	0	+	++	0
SEC3-148	-	+/-	+/-	+/-	--	+	-	+/-	++	0	0	++	+/-	0
SH2	0	+/-	+/-	0	--	-	-	0	-	+	-	++	++	++
SEC4-4	-	+/-	+/-	+/-	+	-	-	+/-	-	0	-	-	++	0
SEC3-191	0	+/-	+/-	+/-	--	-	-	+/-	++	0	-	++	+/-	0
SEC4-3	0	+/-	+/-	+/-	-	+	-	+/-	++	0	-	++	+/-	0
SEC3-133	0	+/-	-	+/-	-	-	-	+/-	++	0	-	-	+/-	0
SEC3-189	0	+/-	+/-	+/-	-	-	-	+/-	-	0	0	-	+/-	0
SEC3-22	0	+/-	-	+/-	-	-	-	+/-	++	0	0	-	+/-	0
SEC3-40	0	+/-	+/-	+/-	--	-	-	+/-	++	0	-	++	+/-	0
SEC1-4	0	+/-	-	+/-	--	-	-	+/-	++	0	0	++	++	0
SH3	-	+/-	+/-	0	--	+	-	0	++	+	0	++	-	++
SH4	0	+/-	+/-	0	+	-	-	0	++	+	0	++	-	-
SH5	-	+/-	-	0	--	-	-	0	++	+	-	++	-	++
SH6	0	+/-	+/-	-	-	-	--	-	++	++	-	++	--	++
SH7	--	+/-	-	0	-	-	-	0	++	+	0	++	++	-
SH8	0	+/-	+/-	0	+	+	-	0	++	+	0	++	-	-
SH9	0	+/-	-	0	-	-	-	0	+	+	-	-	++	++
SH62	-	+/-	+/-	0	-	+	-	0	++	+	-	++	++	++
SH10	-	+/-	+/-	0	+	-	-	0	++	+	-	++	++	++
SH11	0	+/-	+/-	0	-	-	--	0	++	++	0	++	-	++
35	0	+/-	+/-	-	-	+	--	-	-	++	0	++	-	++
36	0	+/-	+/-	0	-	-	-	0	++	+	-	++	-	++
38	-	+/-	+/-	0	+	+	-	0	++	+	-	++	++	++

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
40	0	+/-	+/-	0	-	+	-	0	++	+	0	++	-	++
42	-	+/-	+/-	0	-	-	-	0	++	+	0	++	-	++
43	-	+/-	+/-	0	+	-	-	0	++	+	0	++	++	-
44	0	+/-	+/-	0	-	-	-	0	++	+	0	-	++	++
45	0	+/-	+/-	0	+	-	-	0	-	+	0	++	-	++
46	-	+/-	+/-	0	+	+	-	0	++	+	0	++	-	++
SH13	0	+/-	-	0	-	+	-	0	++	++	0	++	-	-
SH14	--	+/-	+/-	0	--	+	-	0	++	+	-	++	--	-
SH15	0	+/-	+/-	0	-	+	-	0	++	+	0	++	-	-
SEC3-79	0	+/-	-	+/-	-	+	-	+/-	++	0	0	-	+/-	0
SH16	-	+/-	-	-	--	-	--	-	++	++	0	++	--	-
SH17	0	+/-	-	0	-	+	-	0	-	+	0	-	-	-
SH18	0	+/-	-	-	--	-	--	-	-	++	0	-	++	-
SEC3-193	-	+/-	-	+/-	-	-	-	+/-	-	0	-	-	++	0
SH19	0	+/-	-	0	-	-	-	0	++	+	0	-	-	++
SH20	0	+/-	+/-	0	-	-	-	0	++	+	0	++	-	++
SH21	-	+/-	-	0	+	+	--	0	-	++	0	-	--	++
SH22	0	+/-	+/-	0	-	-	-	0	++	+	0	-	-	++
SH23	0	+/-	+/-	0	-	+	-	0	-	+	-	++	-	++
63	0	+/-	+/-	+/-	+	-	-	+/-	++	+/-	0	++	+/-	++
SH24	0	+/-	+/-	0	+	+	-	0	++	+	0	++	-	++
SH25	0	+/-	-	-	--	+	--	-	++	++	-	-	--	++
SH26	-	+/-	+/-	0	--	-	-	0	+	+	0	-	-	++
SH27	0	+/-	+/-	0	-	+	-	0	++	+	0	++	-	++
SH28	0	+/-	-	0	--	+	-	0	++	+	0	++	-	-
SH29	0	+/-	+/-	0	--	+	-	0	++	+	-	+	-	++
71	0	+/-	+/-	0	+	-	-	0	++	+	0	++	-	++
74	0	+/-	+/-	+/-	-	+	-	+/-	++	+/-	0	++	++	+/-
SH30	0	+/-	-	0	-	+	-	0	++	+	0	++	-	++
SH31	-	+/-	+/-	0	--	-	-	0	-	+	0	-	-	++
SH32	0	+/-	+/-	0	+	+	-	0	++	+	0	++	-	++
SH33	-	+/-	+/-	0	-	-	-	0	++	+	-	++	-	++
SH34	-	+/-	-	-	+	-	--	-	++	++	0	-	++	++
SH35	-	+/-	-	-	--	-	--	-	-	++	0	-	++	-
SH36	0	+/-	-	0	--	-	-	0	-	+	0	-	++	-
SH37	-	+/-	-	-	--	-	--	-	-	++	0	-	++	++
SEC3-66	--	+/-	-	+/-	-	-	--	+/-	-	0	-	-	+/-	0
SH38	-	+/-	+/-	0	--	+	-	0	-	+	0	-	-	++
SM1	--	+/-	+/-	-	-	+	--	-	++	++	-	++	+/-	++
SH40	0	+/-	+/-	0	--	+	-	0	++	+	0	-	-	++
SH41	--	+/-	-	-	--	-	--	-	++	++	-	++	--	++
SH42	0	+/-	+/-	0	-	+	-	0	-	+	0	+	++	++
SEC1-3	0	+/-	+/-	+/-	-	-	-	+/-	++	0	-	+	++	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
110	0	+/-	+/-	0	--	-	-	0	+	+	0	+	++	-
118	0	+/-	-	0	-	-	-	0	-	+	-	++	++	++
120	0	+/-	-	0	+	-	--	0	-	++	0	++	++	++
132	0	+/-	+/-	0	--	-	--	0	++	++	-	++	++	++
137	0	0	+/-	0	+	-	-	0	++	+	0	++	++	++
140	0	+/-	-	0	+	-	-	0	-	+	0	-	++	-
142	0	+/-	+/-	0	+	-	-	0	++	+	0	-	++	++
SH43	0	+/-	-	0	-	-	-	0	-	+	0	++	-	++
SH44	0	+/-	+/-	0	+	-	-	0	++	+	-	++	++	-
SH47	0	+/-	+/-	0	--	-	-	0	++	+	0	++	++	++
SM3	-	+/-	+/-	-	-	+	--	-	++	++	0	++	+/-	++
SH49	0	+/-	+/-	0	--	+	-	0	++	+	0	++	++	++
SM4	0	+/-	+/-	0	--	+	-	0	++	+	0	++	+/-	++
SH50	0	+/-	+/-	0	+	+	--	0	++	++	0	++	-	++
SH51	-	+/-	+/-	0	-	-	-	0	++	+	0	-	++	++
SM5	--	+/-	+/-	0	+	-	-	0	++	+	0	++	+/-	++
SM6	-	+/-	+/-	-	-	+	--	-	++	++	-	++	+/-	++
SM7	-	+/-	+/-	-	--	+	--	-	++	++	-	++	+/-	++
SH52	0	+/-	+/-	0	+	-	-	0	++	+	-	++	-	++
SM8	0	+/-	+/-	-	-	+	--	-	++	++	-	++	+/-	++
SH53	0	+/-	+/-	0	-	+	--	-	-	+	-	-	-	++
SH54	-	+/-	+/-	0	--	-	--	0	-	++	-	-	-	++
SH55	-	+/-	+/-	-	--	-	--	-	-	++	-	-	--	++
SH56	0	+/-	+/-	0	+	+	-	0	-	+	-	-	-	++
SH57	0	+/-	+/-	0	--	+	-	0	-	+	-	-	--	++
SH58	-	+/-	+/-	-	-	-	--	-	-	++	-	-	--	++
SG1	0	+/-	+/-	+/-	--	-	-	+/-	-	+	0	-	++	++
188	0	+/-	+/-	0	+	-	-	0	++	+	-	++	++	++
189	0	+/-	+/-	0	+	-	-	0	-	+	0	-	++	++
SH59	0	+/-	-	0	--	-	-	0	++	+	0	-	++	++
191	0	+/-	+/-	0	-	-	-	0	++	+	-	-	++	++
SH61	0	+/-	+/-	0	--	+	-	0	-	+	-	-	-	++
SEC1-1	-	+/-	-	+/-	--	+	-	+/-	++	0	-	++	+/-	0
SEC1-8	0	+/-	+/-	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-5	-	+/-	+/-	+/-	--	-	-	+/-	++	0	0	++	++	0
SEC1-6	-	+/-	+/-	+/-	--	+	-	+/-	-	0	0	++	++	0
SEC1-2	0	+/-	+/-	+/-	-	-	-	+/-	++	0	0	++	++	0
SEC1-7	0	+/-	-	+/-	--	-	-	+/-	-	0	0	-	+/-	0
SM2	0	+/-	+/-	-	--	-	--	-	++	++	0	-	++	-
SH45	0	+/-	+/-	0	--	-	-	0	++	+	0	++	++	++
SH63	0	+/-	+/-	0	-	-	-	0	++	+	0	-	-	++
SH65	-	+/-	+/-	0	+	+	-	0	++	+	0	++	-	++
SH64	0	+/-	+/-	0	+	+	-	0	++	+	-	-	-	++

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
SH66	-	+/-	+/-	0	+	+	-	0	++	+	0	++	-	++

Post-mitigation assessments of reasonable alternative sites

N92. Mitigation, using the emerging SLP policies (see **Appendix F** for the SA evaluation of policies), has been applied to the SA results for each reasonable alternative site and presented in **Appendix G**.

N93. Following the application of policy mitigation, it was identified that many of the adverse effects will likely be reduced or mitigated, including:

- Alterations to the character/setting of heritage assets;
- Threats to locally distinctive or sensitive landscapes;
- Threats to biodiversity sites, priority habitats and ecological networks;
- Reduction in GHG emissions;
- Risk of fluvial and surface water flooding;
- Loss of land with environmental value;
- Exposure to and exacerbation of poor air quality;
- Risk of contamination of groundwater Source Protection Zones and watercourses;
- Access to transport networks and local services;
- Location of residents in deprived areas;
- Access to healthcare facilities;
- Access to greenspace;
- Loss of an access to employment; and
- Access to education opportunities.

Table N.13: Summary of post-mitigation reasonable alternative site assessments (extracted from **Appendix G**)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
SEC3-181	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC4-1	0	0	0	+/-	+	-	-	+/-	++	0	0	0	0	0
SEC3-9	0	+	-	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-99	+	+	-	+/-	+	+	-	+/-	++	0	0	++	0	0
SH1	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SEC3-113	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-46	0	0	-	+/-	+	-	-	+/-	++	0	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
SEC3-175	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-36	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-29	0	0	0	+/-	+	-	-	+/-	+	0	0	+	++	0
SEC3-148	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SH2	0	0	0	0	0	-	-	0	++	+	0	++	++	++
SEC4-4	0	0	0	+/-	+	-	-	+/-	+	0	0	0	++	0
SEC3-191	0	0	0	+/-	+	-	-	+/-	++	0	0	++	0	0
SEC4-3	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC3-133	0	0	-	+/-	+	-	-	+/-	++	0	0	0	0	0
SEC3-189	0	0	0	+/-	+	-	-	+/-	+	0	0	0	0	0
SEC3-22	0	0	-	+/-	+	-	-	+/-	++	0	0	++	0	0
SEC3-40	0	0	0	+/-	+	-	-	+/-	++	0	0	++	0	0
SEC1-4	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SH3	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH4	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH5	0	0	-	0	0	-	-	0	++	+	0	++	++	++
SH6	0	0	0	-	+	-	-	-	++	++	0	++	++	++
SH7	+	0	-	0	+	-	-	0	++	+	0	++	++	++
SH8	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH9	0	0	-	0	+	-	-	0	+	+	0	++	++	++
SH62	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH10	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH11	0	0	0	0	+	-	-	0	++	++	0	++	++	++
35	0	+	0	-	+	+	-	-	+	++	0	++	++	++
36	0	0	0	0	+	-	-	0	++	+	0	++	++	++
38	0	+	0	0	+	+	-	0	++	+	0	++	++	++
40	0	+	0	0	+	+	-	0	++	+	0	++	++	++
42	0	0	0	0	+	-	-	0	++	+	0	++	++	++
43	+	0	0	0	+	-	-	0	++	+	0	++	++	++
44	0	0	0	0	+	-	-	0	++	+	0	0	++	++
45	0	0	0	0	+	-	-	0	+	+	0	++	++	++
46	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH13	0	+	0	0	+	+	-	0	++	++	0	++	++	++
SH14	+	+	0	0	+	+	-	0	++	+	0	++	++	++
SH15	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SEC3-79	0	+	-	+/-	+	+	-	+/-	++	0	0	0	0	0
SH16	+	0	-	-	0	-	-	-	++	++	0	++	++	++
SH17	0	+	-	0	+	+	-	0	++	+	0	0	++	++
SH18	0	0	-	-	+	-	-	-	++	++	0	++	++	++
SEC3-193	0	0	-	0	+	-	-	0	+	+	0	0	++	0
SH19	0	0	-	0	+	-	-	0	++	+	0	++	++	++
SH20	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH21	0	+	-	0	+	+	-	0	++	++	0	++	++	++
SH22	0	0	0	0	+	-	-	0	++	+	0	0	++	++
SH23	0	+	0	0	+	+	-	0	++	+	0	++	++	++
63	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	++
SH24	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH25	0	+	-	-	+	+	-	-	++	++	0	0	++	++

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
SH26	0	0	0	0	+	-	-	0	+	+	0	++	++	++
SH27	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH28	0	+	-	0	0	+	-	0	++	+	0	++	++	++
SH29	0	+	0	0	+	+	-	0	++	+	0	+	++	++
71	0	0	0	0	+	-	-	0	++	+	0	++	++	++
74	0	+	0	+/-	+	+	-	+/-	++	+	0	++	0	++
SH30	0	+	-	0	+	+	-	0	++	+	0	++	++	++
SH31	0	0	0	0	+	-	-	0	+	+	0	++	++	++
SH32	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH33	+	0	0	0	+	-	-	0	++	+	0	++	++	++
SH34	+	0	0	-	+	-	-	-	++	++	0	++	++	++
SH35	0	0	-	-	0	-	-	-	++	++	0	++	++	+
SH36	0	0	-	0	0	-	-	0	++	+	0	++	++	++
SH37	0	0	-	-	+	-	-	-	+	++	0	++	++	++
SEC3-66	+	0	-	+/-	+	-	-	+/-	+	0	0	0	0	0
SH38	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SM1	+	+	0	-	+	+	-	-	++	++	0	++	++	++
SH40	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SH41	0	0	0	-	+	-	-	-	++	++	0	++	++	++
SH42	0	+	0	0	+	+	-	0	++	+	0	+	++	++
SEC1-3	0	0	0	+/-	+	-	-	+/-	++	0	0	+	++	0
110	0	0	0	0	0	-	-	0	+	+	0	+	++	++
118	0	0	0	0	+	-	-	0	++	+	0	++	++	++
120	0	0	-	0	+	-	-	0	++	++	0	++	++	++
132	0	0	0	0	0	-	-	0	++	++	0	++	++	++
137	0	0	0	0	+	-	-	0	++	+	0	++	++	++
140	0	0	0	0	+	-	-	0	++	+	0	0	++	++
142	0	0	0	0	+	-	-	0	++	+	0	0	++	++
SH43	0	0	-	0	+	-	-	0	++	+	0	++	+	++
SH44	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH47	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM3	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SH49	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SM4	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH50	0	+	0	0	+	+	-	0	++	++	0	++	++	++
SH51	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM5	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM6	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SM7	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SH52	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SM8	0	+	0	-	+	+	-	-	++	++	0	++	++	++
SH53	0	+	0	0	+	+	-	-	++	+	0	0	++	++
SH54	0	0	0	0	+	-	-	0	++	++	0	0	++	++
SH55	0	0	0	-	+	-	-	-	++	++	0	0	++	++
SH56	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SH57	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SH58	0	0	0	-	+	-	-	-	++	++	0	0	++	++
SG1	0	0	0	+/-	+	-	-	+/-	++	+	0	0	++	++

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Site ref	Cultural Heritage	Landscape	Biodiversity, Flora & Fauna	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Equality	Health & Wellbeing	Economy	Education
188	0	0	0	0	+	-	-	0	++	+	0	++	++	++
189	0	0	0	0	+	-	-	0	++	+	0	0	++	++
SH59	0	0	-	0	0	-	-	0	++	+	0	++	++	++
191	0	0	0	0	+	-	-	0	++	+	0	0	++	++
SH61	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SEC1-1	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
SEC1-8	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-5	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-6	0	+	0	+/-	0	+	-	+/-	++	0	0	++	++	0
SEC1-2	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
SEC1-7	0	0	-	+/-	0	-	-	+/-	++	0	0	++	0	0
SM2	0	0	0	-	0	-	-	-	++	++	0	++	++	++
SH45	0	0	0	0	0	-	-	0	++	0	0	++	++	++
SH63	0	0	0	0	+	-	-	0	++	+	0	++	++	++
SH65	0	+	0	0	+	+	-	0	++	+	0	++	++	++
SH64	0	+	0	0	+	+	-	0	++	+	0	0	++	++
SH66	0	+	0	0	+	+	-	0	++	+	0	++	++	++

7 The preferred approach

Sandwell Local Plan policies

- N94. Following comments received during the Regulation 18 consultations and recommendations set out in the SA reports, SMBC have revisited the policies of the SLP. There are a total of 88 proposed policies within the SLP.
- N95. The proposed SLP policies seek to support the delivery of sustainable growth within Sandwell. The policies will help to ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the SLP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes.
- N96. The 88 SLP policies are listed below in **Table 6.1** and have been assessed in **Appendix F** alongside the proposed vision and strategic objectives of the SLP.

Table N.14: Sandwell Local Plan Policies

Policy Ref.	Policy name
	Development Strategy
SDS1	Spatial Strategy for Sandwell
SDS2	Increasing Efficiency and Resilience
SDS3	Regeneration in Sandwell
SDS4	Towns and Local Areas
SDS5	Achieving Well-designed Places
SDS6	Cultural Facilities and the Visitor Economy
SDS7	Sandwell's Green Belt
SDS8	Green and Blue Infrastructure in Sandwell
	Sandwell's Natural and Historic Environment
SNE1	Nature Conservation
SNE2	Protection and Enhancement of Wildlife Habitats
SNE3	Provision, Retention and Protection of Trees, Woodlands and Hedgerows
SNE4	Geodiversity and the Black Country UNESCO Global Geopark
SNE5	The Rowley Hills
SNE6	Canals
SHE1	Listed buildings and Conservation Areas
SHE2	Development in the Historic Environment
SHE3	Locally Listed Buildings
SHE4	Archaeology
	Climate Change
SCC1	Energy Infrastructure
SCC2	Reducing Operational Carbon for New Build Non-residential Development
SCC3	Climate-adapted Design and Construction
SCC4	Embodied Carbon and Waste
SCC5	Flood Risk

Policy Ref.	Policy name
SCC6	Sustainable Drainage
Health and Wellbeing in Sandwell	
SHW1	Health Impact Assessments
SHW2	Healthcare Infrastructure
SHW3	Air Quality
SHW4	Open Space and Recreation
SHW5	Playing Fields and Sports Facilities
SHW6	Allotments
Sandwell's Housing	
SHO1	Delivering Sustainable Housing Growth
SHO2	Windfall Developments
SHO3	Housing Density, Type and Accessibility
SHO4	Affordable Housing
SHO5	Delivering Accessible and Self/ Custom Housing
SHO6	Protecting Family Housing (Use Class C3)
SHO7	Houses in Multiple Occupation
SHO8	Education Facilities
SHO9	Accommodation for Gypsies, Travellers and Travelling Showpeople
SHO10	Housing for People with Specific Needs
Sandwell's Economy	
SEC1	Providing for Economic Growth and Jobs
SEC2	Strategic Employment Areas
SEC3	Local Employment Areas
SEC4	Other Employment Sites
SEC5	Improving Access to the Labour Market
SEC6	Relationship Between Industry and Sensitive Uses
Sandwell's Centres	
SCE1	Sandwell's Centres
SCE2	Non-E Class Uses in Town Centres
SCE3	Town Centres (Tier-two Centres)
SCE4	District and Local Centres (Tier-three Centres)
SCE5	Provision of Small-scale Local Facilities Not in Centres
SCE6	Edge of Centre and Out of Centre Development
West Bromwich	
SWB1	West Bromwich Strategic Centre
SWB2	Development in West Bromwich
Transport	
STR1	Priorities for the Development of the Transport Network
STR2	Safeguarding the Development of the Key Route Network (KRN)
STR3	Managing Transport Impacts of New Development
STR4	The Efficient Movement of Freight & Logistics
STR5	Creating Coherent Networks for Cycling and Walking
STR6	Influencing the Demand for Travel and Travel Choices
STR7	Network Management

Policy Ref.	Policy name
STR8	Parking Management
STR9	Planning for Low Emission Vehicles
STR10	Transport Innovation and Digital Connectivity
	Infrastructure and Delivery
SID1	Infrastructure Provision
SID2	Digital Infrastructure
SID3	5G Network Infrastructure
SID4	Communications Infrastructure/ Equipment
	Waste and Minerals
SWA1	Waste Infrastructure Future Requirements
SWA2	Waste Sites
SWA3	Preferred Areas for New Waste Facilities
SWA4	Locational Considerations for New Waste Facilities
SWA5	Resource Management and New Development
SMI1	Minerals Safeguarding
SMI2	Managing the Effects of Mineral Development
	Development Constraints and Industrial Legacy
SCO1	Hazardous Installations and Substances
SCO2	Pollution Control
SCO3	Land Contamination and Instability
	Development Management
SDM1	Design Quality
SDM2	Development and Design Standards
SDM3	Tall Buildings and Gateway Sites
SDM4	Advertisements
SDM5	Shop Fronts and Roller Shutters
SDM6	Hot Food Takeaways
SDM7	Management of Hot Food Takeaways
SDM8	Gambling Activities and Alternative Financial Services
SDM9	Community Facilities
SDM10	Telecommunications

N97. The impact matrices for the policy assessments are presented in **Table N.16**. These impacts should be read in conjunction with the full assessment narrative presented in **Appendix F**.

Table N.15: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDS1	+	+	+	+	+	+	-	-	+	+	+	+	+	+
SDS2	+	+	+	++	+	+	+	0	+	0	0	+	0	0
SDS3	+	+	+	+	0	++	+	0	+	+	+	+	++	+
SDS4	0	0	+	+/-	0	+	0	0	+	+	+	+	+	0
SDS5	++	++	0	+	+	0	+	0	+	0	+	+	0	0
SDS6	+	+	0	+	0	0	0	0	+	0	+	+	+	0
SDS7	+	+	0	0	0	+	0	0	0	0	0	+	0	0
SDS8	+	+	+	+	+	0	+	0	0	0	0	+	+	0
SNE1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE2	0	+	++	+	+	0	+	0	0	0	0	+	0	0
SNE3	0	+	+	+	+	+	+	0	0	0	0	+	0	0
SNE4	+	+	+	0	0	0	0	0	0	0	0	0	+	+
SNE5	+	++	++	0	+	0	+	0	0	0	0	+	0	0
SNE6	+	+	+	0	+	0	+	0	+	+	+	+	+	0
SHE1	++	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE2	++	+	+	0	0	0	0	0	0	0	0	0	+	0
SHE3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
SHE4	+	+	0	0	0	0	0	0	0	0	0	0	0	+
SCC1	0	0	0	++	+	0	++	+	0	0	+	+	+	0
SCC2	0	0	0	++	+	0	++	+	0	0	0	+	+	0
SCC3	0	0	+	+	++	+	+	0	0	0	0	+	0	0
SCC4	0	0	0	++	0	0	+	++	0	0	0	0	+	0
SCC5	0	0	+	0	++	+	+	0	0	0	0	+	0	0
SCC6	0	+	+	0	+	0	+	0	0	0	0	0	0	0
SHW1	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
SHW3	0	0	+	+	0	0	++	0	+	0	0	+	+	0
SHW4	0	+	+	+	+	0	+	0	+	0	+	++	0	0
SHW5	0	+	0	0	0	0	0	0	+	0	+	+	0	0
SHW6	0	+	+	0	0	0	0	0	0	0	+	+	0	0
SHO1	+/-	+/-	+	0	-	-	-	-	+	+	+	+	0	+
SHO2	0	0	0	+/-	+/-	+	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
SHO3	0	0	0	+	0	0	+	0	+	+	+	+	0	0
SHO4	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO5	0	0	0	0	0	0	0	0	0	+	+	+	0	0
SHO6	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SHO7	0	0	0	0	0	0	0	0	+	+	+	+	0	0
SHO8	0	0	0	+	0	0	+	0	+	0	+	+	+	++
SHO9	0	0	+	-	0	0	-	0	+	+	+	+	0	+
SHO10	0	0	0	0	0	0	0	0	+	0	+	+	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SEC1	+/-	+/-	+	+	-	-	-	+	+	0	+	0	+	+
SEC2	+/-	0	0	+/-	0	0	+/-	+/-	+	0	+	0	+	0
SEC3	+/-	0	0	+/-	0	0	+/-	+	+	0	+	0	+	0
SEC4	+/-	+/-	0	+/-	+/-	0	+/-	+/-	+	+	+	0	+	0
SEC5	0	0	0	0	0	0	0	0	+	0	+	+	+	+
SEC6	0	0	0	0	0	0	0	0	0	0	0	0	+	0
SCE1	+/-	+/-	+/-	+	+/-	+	+/-	+/-	+	+	+	+	+	+/-
SCE2	0	+	0	0	0	0	0	0	0	0	+	0	+	0
SCE3	0	0	0	0	0	0	0	0	+	+	+	+	+	+
SCE4	0	0	0	0	0	0	0	0	+	+	+	0	+	0
SCE5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SCE6	0	0	0	+	0	0	+	0	+	0	+	+	+	0
SWB1	0	+	0	+	+	+	0	0	+	+	+	+	+	+
SWB2	0	+	0	+	0	+	0	0	+	+	+	+	+	+
STR1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
STR2	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR3	0	0	0	+	0	0	0	0	+	0	0	0	0	0
STR4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
STR5	0	0	0	+	0	0	+	0	++	0	+	+	0	0
STR6	0	0	0	+	0	0	+	0	++	0	0	0	0	0
STR7	0	0	0	0	0	0	0	0	+	0	0	0	0	0
STR8	0	0	0	0	0	0	0	0	+	0	0	0	+	0
STR9	0	0	0	+	0	0	+	0	+	0	0	0	0	0
STR10	0	0	0	+	0	0	+	0	+	0	0	0	+	0
SID1	0	0	+	+	+	0	+	+	+	+	+/-	+	+	+
SID2	0	0	0	+	0	0	+	0	+	0	+	0	+	+
SID3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SID4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SWA1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
SWA2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
SWA4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
SWA5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
SMI1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
SMI2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
SCO1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SCO2	0	0	0	0	0	0	+	0	0	0	0	0	0	0
SCO3	0	+	0	0	0	+	0	0	0	0	0	0	0	0
SDM1	+	+	+	+	+	0	+	0	+	0	+	+	0	0
SDM2	0	0	0	0	0	+	0	0	0	0	0	+	0	0
SDM3	0	+	0	+	0	+	0	0	+	0	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
SDM4	0	+	0	0	0	0	0	0	0	0	0	0	0	0
SDM5	+	+	0	0	0	0	0	0	0	0	0	0	+	0
SDM6	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM7	0	0	0	0	0	0	0	+	0	0	0	0	+	0
SDM8	0	0	0	0	0	0	0	0	0	0	0	0	+/-	0
SDM9	0	0	0	0	0	0	0	0	0	0	+	+	0	0
SDM10	0	0	0	0	0	0	0	0	0	0	0	0	+	0

Site allocations

N98. The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is SMBC's role to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the SLP and which to 'reject' from further consideration.

N99. The SA findings relating to reasonable alternative sites were fed back to the Council on an iterative basis to assist in decision-making regarding the selection or rejection of each site within the emerging SLP.

N100. A total of 98 sites have been selected. These consist of:

- 61 sites for housing;
- 28 sites for employment use;
- One site for Gypsy, Traveller and Travelling Showpeople use; and
- Eight sites for mixed uses.



N101. **Appendix H** sets out the outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process, provided by SMBC.




8 Likely significant effects on the environment

Identified impacts



- N102. Proposals in the SLP have been assessed for their sustainability impacts, the results of which are presented in the relevant appendices / report chapters as listed above. The assessment of the Plan, including reasonable alternatives, was undertaken using a combination of empirical evidence, and to a lesser extent, professional judgement.
- N103. **Table N.18** provides a summary of the potential negative impacts of the LP relating to each of the sustainability themes (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**). These are the impacts that have been identified prior to the implementation of the SLP mitigation.



Table N.16: Summary of identified potential impacts of the Sandwell Local Plan

Sustainability theme	Summary of potential impacts of the Local Plan
 <p>AIR QUALITY</p>	<ul style="list-style-type: none"> • Increased pollutant emissions: Impacts on air quality may arise during the construction and occupation of different types of development proposed within the SLP. Some types of new development, such as employment locations, local facility provisions or the cumulative impact of high-density residential development, are likely to increase the volume of traffic and associated emissions within the SLP area. • Exposure of human and biodiversity receptors to poor air quality: An increase in air pollution from new development including vehicular emissions could potentially have adverse impacts on biodiversity assets, in particular European sites and SSSIs which are vulnerable to the impact of atmospheric nitrogen deposition, such as nearby SSSIs 'Wren's Nest' or 'The Leasowes'. In addition, Exposure to sources of air pollution could potentially have adverse effects on the health of local residents, with children, the elderly and those of poor health identified as the most vulnerable.
 <p>BIODIVERSITY, FLORA, FAUNA & GEODIVERSITY</p>	<ul style="list-style-type: none"> • Threats or pressures to European sites: A number of likely significant effects (LSEs) have been identified in the HRA screening process with regard to several European sites; this includes adverse effects across a number of impact pathways including regarding air quality, and water quality and quantity. • Threats or pressures to locally designated and non-statutory biodiversity sites: Adverse impacts on locally designated sites arising due to development proposed in the SLP could potentially include direct impacts on habitats and / or indirect impacts such as increased recreational disturbance caused by local residents visiting these sites, such as Local Nature Reserves, SINCS and SLINCS. • Fragmentation of the ecological network and priority habitats: Over half of all allocated sites are located on previously undeveloped land or land with environmental value, which is likely to result in the loss of soil

Sustainability theme	Summary of potential impacts of the Local Plan
 <p>CLIMATIC FACTORS</p>	<p>resources and the ecosystem services they provide. In addition, priority habitats cover 8% of the total site allocation area. High levels of development and increased density within the urban area of Sandwell may also result in losses to the GI network, where it is important to retain ecological links amongst built form.</p> <ul style="list-style-type: none"> <p>Fluvial and surface water flood risk: Development within Flood Zones 2 or 3 (including 3a and 3b) has the potential to locate site end users at risk of fluvial flooding, may increase the risk of damage to property and increase risks to human health in the immediate area and/or contribute to exacerbation of flood risk in the surrounding areas. Additionally, development in areas of surface water flood risk may locate site end users in areas at risk of flooding, with safety implications, and further exacerbate flood risk in the surrounding area.</p> <p>Increased GHG emissions: The proposed development is likely to increase to some extent local GHG emissions through increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions, and the production and use of materials during construction / release of embodied carbon associated with redevelopment sites.</p> <p>Loss of multi-functional green infrastructure: The proposed development will result in the loss of a significant area of land with environmental/ecological value. Some of the proposed development could potentially also result in the loss of trees, hedgerows and other vegetation currently on site. Multi-functional GI is vital in helping to reduce adverse impacts of climate change.</p>
 <p>CULTURAL HERITAGE</p>	<ul style="list-style-type: none"> <p>Alter character and/or setting of designated heritage assets: Development which coincides with or is located in close proximity to heritage assets such as Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monuments has the potential to affect both the asset itself and its setting.</p> <p>Effects on the historic environment: The Black Country Historic Landscape Characterisation (HLC) Study²⁶ identified a number of Archeological Priority Areas (APAs) and Areas of High Historic Townscape Value (AHHTVs).</p>
 <p>HUMAN HEALTH</p>	<ul style="list-style-type: none"> <p>Sustainable access to healthcare facilities: Sandwell is a predominately urban area, and as a consequence has access to a large number of health facilities. Where there is more limited access to these facilities, residents may be discouraged from living active and healthy lifestyles, which could potentially have adverse impacts on mental wellbeing as well as physical health.</p>

²⁶ 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-ir_redacted.pdf
 [Date accessed: 07/08/24]


Sustainability theme	Summary of potential impacts of the Local Plan
	<ul style="list-style-type: none"> • Exposure to air/noise pollution (from AQMAs/main roads): The entirety of the SLP area is classified as an AQMA and approximately half of allocated sites are located in proximity to main roads. The long-term health of residents, in particular vulnerable groups including children and the elderly, could be adversely affected by local reductions in air quality. • Loss of public greenspace: Good access to public green or open spaces, a diverse range of natural habitats and travelling via walking and cycling are known to have physical and mental health benefits. Whilst there is generally good access to open space across Sandwell as a whole, there are spatial variations on existing access to different types and sizes of open space across different areas. • Limited access to PRoW or cycle network: The majority of allocated sites are located in areas with good coverage by the PRoW and/or cycle networks, providing many site end users with opportunities for active travel and recreation parks, open space or the surrounding countryside. However, 13 allocated sites are located beyond the sustainable target distance of 600m to a PRoW or cycle path.
 <p>LANDSCAPE AND TOWNSCAPE</p>	<ul style="list-style-type: none"> • Threaten or result in the loss of locally distinctive or sensitive landscapes: The introduction of new built form can contradict and conflict with distinctive local landscapes and townscapes which can result in adverse impacts on sensitive landscapes and loss of local character.
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> • Provision of housing to meet local need: The large number of dwelling proposed is expected to meet a large proportion of the identified housing need with the remainder being met through other forms of housing provision such as through windfall developments and export to neighbouring local authorities via the Duty to Co-operate. • Provision of employment opportunities: The SLP allocated a large area of employment land and will therefore be likely to have a positive impact on the local economy, as well as the wellbeing of residents. • Sustainable access to services and facilities: Good access to public transport, schools, local services and employment opportunities is essential to reduce reliance on private car use, encourage healthy and active lifestyles and provide accessibility to spaces which could potentially have benefits to mental wellbeing and community cohesion. • Increased pressure of local services and facilities: The proposed development within the SLP is expected to increase population density across Sandwell. This will be likely to apply greater pressures on the capacity of services within the Plan area, including schools, GP surgeries, leisure centres and open spaces. • Addressing inequalities: All residents should be provided with equal access to a range of opportunities, to support the local population in living happy and healthy lifestyles. Fostering interactive and vibrant communities



Sustainability theme	Summary of potential impacts of the Local Plan
	<p>often benefit from a strong sense of place, a reduced fear of crime and a strong local economy.</p> <ul style="list-style-type: none"> • Increased household waste generation: SMBC has responsibility for the provision of waste collection and recycling services for households as part of the management of waste. The proposed development is expected to increase household waste generation and have a potential adverse impact on the capacity of waste management facilities.
 <p>SOIL</p>	<ul style="list-style-type: none"> • Direct loss of soil resources: Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, carbon storage and providing the basis for vegetation to flourish. Where construction occurs, soil could potentially be compacted by heavy vehicles on-site. During the occupation or operation phase of development, soil, in some circumstances, could potentially be paved over, become subject to increased footfall or be subject to increased volumes of chemicals.
 <p>WATER</p>	<ul style="list-style-type: none"> • Pending WCS

Mitigation

N104. Table N.19 summarises these mitigating effects of the 55 Local Plan strategic and non-strategic policies and the 45 site allocation policies (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**).

Table N.17: Summary of policy mitigation

Sustainability theme	Summary of mitigating effects of the Local Plan policies
 <p>AIR QUALITY</p>	<ul style="list-style-type: none"> • Various policies seek to improve traffic flow and promote sustainable and active modes of transport in order to avoid reductions in air quality, including Policy STR1: Priorities for the development of the transport network and Policy STR5: Creating coherent networks for cycling and walking, as well as policies STR2, STR3, STR4, STR6, STR8 and Policy STR9. • Policy SCC2: Reducing operational carbon for new build non-residential development, supported by Policy SCC1 – Energy Infrastructure, Policy SDS2: Increasing efficiency and resilience and Policy SDMI: Design Quality, promote energy-efficient development proposals which support low carbon technologies, which will likely result in a decrease of pollutant emissions from the construction and occupation of new development. • Policy SDS8: Green and Blue Infrastructure in Sandwell and Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows encourage enhancements to the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as the

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<p>filtration of air pollutants and could potentially result in reducing impacts from increased emissions.</p>
 <p>BIODIVERSITY, FLORA, FAUNA & GEODIVERSITY</p>	<ul style="list-style-type: none"> • Policy SNE1: Nature Conservation seeks to protect, conserve and enhance biodiversity assets including local designations. Where the benefits of development strategically outweigh the importance of a local nature conservation site, "<i>damage must be minimised</i>" and remaining impacts must be fully mitigated with an accompanying mitigation strategy. • Policy SNE2: Protection and enhancement of wildlife habitats supports the provision and enhancement of priority habitats as part of the implementation of biodiversity net gain. • Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows aims to utilise these biodiversity features for habitat creation and the restoration of ecological networks. This is supported by Policy SDS8: Green and Blue Infrastructure in Sandwell, Policy SNE5: The Rowley Hills and Policy SNE6: Canals, all of which seek to improve habitat creation and enhancement in the Plan area.
 <p>CLIMATIC FACTORS</p>	<ul style="list-style-type: none"> • Policy SCC5: Flood risk sets out measures to identify and manage the risk of flooding throughout the borough and ensure that development is avoided in areas of high fluvial and surface water flood risk, in line with the NPPF. The policy also encourages development proposals to naturalise urban watercourses and open up culverts to provide multi-functional benefits, including for reinstating natural river channels. • Policy SCC6: Sustainable drainage underpins Policy SCC5 in relation to SuDS, outlining design requirements and states that "<i>surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in</i>". • Policies SNE1: Nature Conservation, SDS8: Green and Blue Infrastructure in Sandwell provides measures that would protect and enhance green and blue infrastructure and ecosystem services, with likely multi-functional benefits including for flood risk reduction. • Policy SCC2: Reducing operational carbon for new build non-residential development, supported by Policy SCC1 – Energy Infrastructure, Policy SDS2: Increasing efficiency and resilience and Policy SDMI: Design Quality, promote energy-efficient development proposals which support low carbon technologies, which will likely result in a decrease of GHG emissions from the construction and occupation of new development. • Policy SCC3: Climate-adapted design and construction aims to reduce the risk of heat gain and the urban heat island effect (UHI) through efficient building design. The policy requires "<i>passive ventilation</i>" and "<i>active cooling systems</i>", in order to reduce heat gain lost to the environment, which has potential for cumulative adverse effects when considering the impacts of global warming as a consequence of climate change.

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<ul style="list-style-type: none"> • Policy SCC4: Embodied carbon and waste aims to limit the amount of embodied carbon resulting from the proposed development by completing a whole-life carbon assessment for large-scale developments and considering a range of options for small-scale development. • Several policies including Policy SNE1: Nature conservation, Policy SNE2: Protection and enhancement of wildlife habitats, and Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows seek to improve biodiversity provision and ecological networks and Sandwell, which is likely to positively contribute to the conservation and enhancement of the GI/BI network.
 <p>CULTURAL HERITAGE</p>	<ul style="list-style-type: none"> • Policy SHE1: Listed buildings and conservation areas states that development proposals will be required to "<i>conserve and enhance local character</i>" and those aspects of the historic environment together with their settings. • Policy SHE2: Development in the historic environment states that areas of distinctive heritage within the borough will be "<i>retained and, wherever possible, enhanced and their settings respected</i>". • Policy SHE3: Locally listed buildings ensures heritage assets are conserved and enhanced, stating that development proposals affecting locally listed buildings will only be permitted where they "<i>positively contribute towards the significance of the heritage asset and avoid harm</i>". • Policy SHE4: Archaeology states that "<i>development should protect and conserve both designated and non-designated archaeological assets and the character and setting of areas of acknowledged archaeological significance</i>". The policy also requires sites with known archaeological potential to provide an archaeological assessment and / or field evaluation. • Many SLP policies including Policy SDS1: Spatial Strategy for Sandwell and SDS3: Regeneration in Sandwell encourage regeneration and redevelopment of industrial land, town centres and canal corridors with potential opportunities for enhancement of cultural heritage features and historic buildings which can contribute to creating a strong sense of place and celebrating Sandwell's history. • Policy SNE6: Canals recognises the historic, architectural, archaeological and cultural significance of the canal network and will ensure that any development proposals affecting canals will protect and enhance these aspects.
 <p>HUMAN HEALTH</p>	<ul style="list-style-type: none"> • Policy SDS1: Spatial Strategy for Sandwell seeks to direct housing growth towards locations with the highest levels of sustainable transport access to services including healthcare facilities. • Policy SHW1: Health Impact Assessments sets out the requirement for certain development proposals to undertake an HIA to ensure that adverse effects associated with physical and mental health and access to and demand for health and social care services are addressed, and that opportunities for promoting healthy lifestyles are maximised.

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<ul style="list-style-type: none"> • Policy SHW2: Healthcare infrastructure states that new healthcare facilities should “<i>well-designed</i>” and “<i>well-served by public transport infrastructure</i>”. Furthermore, the policy requires any development that has unacceptable impacts upon the functionality of healthcare facilities to “<i>contribute to the provision or improvement of such services</i>”, and will ensure there is sufficient capacity in healthcare infrastructure to serve new growth. • Policy SDM9: Community facilities includes measures to increase provision for community and leisure facilities, which has potential to encourage site end users to live active and healthy lifestyles. • Policy STR1: Priorities for the development of the transport network states that “<i>all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport</i>”, which will likely improve access to healthcare and leisure facilities. • Policy SDS1: Spatial Strategy for Sandwell will ensure that new public open spaces are created to serve new housing developments.
 <p>LANDSCAPE</p>	<ul style="list-style-type: none"> • Policy SHE1: Listed buildings and conservation areas states that development proposals will be required to “<i>conserve and enhance local character</i>”. This is supported by Policies SHE2: Development in the historic environment, SHE3: Locally listed buildings and SHE4: Archaeology, which will ensure the protection and enhancement of heritage assets within the borough to positively contribute to local character and distinctiveness. • Policy SDS8: Green and blue infrastructure in Sandwell provides measures to support green and blue infrastructure within the borough, which is expected to positively contribute to the locally distinctive landscape and townscape character. Policy SDS2: Increasing efficiency and resilience supports this by encouraging an increase in green cover and the incorporation of “<i>landscaping schemes</i>”. • Policy SNE3: Provision, retention and protection of trees, woodlands and hedgerows supports the provision, retention and protection of trees, woodlands and hedgerows, which would also be expected to contribute towards the conservation and enhancement of landscape character through urban greening. • Policy SNE5: The Rowley Hills aims to protect the Rowley Hills from inappropriate development that will lead to the loss of valued qualities that make up the local landscape character, including panoramic views. • Policies SDM1: Design quality, SDM2: Development and design standards, SDM3: Tall buildings and gateway sites, SDS5: Achieving well-designed places and other Development Management policies seek to ensure that new development creates a strong sense of place and help to conserve and enhance the landscape / townscape character, and will ensure the visual effects of relevant proposals (such as tall buildings) are identified and assessed.

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<ul style="list-style-type: none"> Many SLP policies including Policy SDS1: Spatial Strategy for Sandwell and SDS3: Regeneration in Sandwell encourage regeneration and redevelopment of industrial land, town centres and canal corridors with potential opportunities for enhancement of Sandwell’s townscapes which can contribute to creating a strong sense of place and improve the appearance and function of urban areas.
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> Policy SHO1: Delivering sustainable housing growth and Policy SDS1: Spatial Strategy for Sandwell supports the delivery of 10,434 homes in order to contribute to meeting the identified housing need which providing a range of choice of new homes, whilst setting out locations of housing land supply including for potential windfall developments as set out in Policy SHO2: Windfall developments. Policy SHO3: Housing density, type and accessibility seeks to provide a "range of types and sizes of accommodation" in order to create "mixed, sustainable and inclusive communities", which is supported by Policy SHO4: Affordable housing which aims to provide a proportion of affordable homes on developments of ten or more residences. Other policies such as Policy SHO5: Delivering accessible and self / custom build housing, Policy SHO6: Protecting family housing (Use Class C3) and Policy SHO7: Houses in multiple occupation set out a variety of regulations to ensure housing standards meet the needs of occupants. Policy SHO9: Accommodation for Gypsies, Travellers and Travelling Showpeople seeks to protect existing Gypsy, Traveller and Travelling Showpeople sites and ensures a sufficient number of pitches are allocated to meet the identified need. Policy SDS3: Regeneration in Sandwell states that the defined Regeneration Areas will provide high-quality employment land and will be the principal location for new industrial/logistics development, with likely benefits in terms of economic growth and providing opportunities for developing a skilled workforce. Policies SDM1: Design Quality, STR1: Priorities for the development of the transport network, STR2: Safeguarding the development of the KRN, STR3: Managing transport impacts of new development and STR5: Creating coherent networks for cycling and walking ensure that residents have sustainable access to employment opportunities through well-designed places and strong transport infrastructure. Policies SID2: Digital infrastructure and SDM10: Telecommunications will aim to improve access to employment opportunities, including home working, through the provision of a strong fibre network and telecommunications infrastructure. Policy SHO8: Education facilities supports the development or expansion of education facilities and states that nurseries, schools and higher education

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<p>facilities should be "well- designed" to increase the quality and capacity of educational facilities.</p> <ul style="list-style-type: none"> • Policy SHW5: Playing fields and sports facilities states that playing fields and sports facilities "will be encouraged, especially in areas where public provision is deficient". • Policy SWA1: Waste infrastructure future requirements sets out the waste infrastructure requirements to be adhered to throughout the borough, seeking to reduce the generation of waste and associated pollution, promote re-use and recycling of waste in line with the waste hierarchy. The policy ensures the "minimisation of waste production and the re-use and recovery of waste materials" by providing sufficient waste facilities. • Policies SWA2: Waste sites, SWA3: Preferred areas for new waste facilities and SWA4: Locational considerations for new waste facilities set out measures to ensure waste facilities meet the demand of the borough in regard to capacity. These make sure waste facilities are sustainable by nature/design, whilst being strategically located in suitable locations.
 <p>SOIL</p>	<ul style="list-style-type: none"> • The proposed development strategy for the SLP promotes the use of brownfield land as much as possible. Policy SDS1: Spatial Strategy for Sandwell states that development within the borough will seek to achieve sustainable development through "delivering development on brownfield sites in the urban area". • Underpinning Policy SDS1 are Policies SDS3: Regeneration in Sandwell which focuses on regeneration of existing urban areas, SCO3: Land contamination and instability which encourages development to make use of contaminated land, SDM3: Tall Buildings and Gateway Sites which supports higher density development which will reduce overall land-take and make efficient use of land, and SHO2: Windfall developments which aims to prevent the use of unallocated greenfield land for development. These policies will help to ensure undeveloped land is protected and that previously developed land in urban areas is utilised. • Policies SNE1: Nature conservation, SNE2: Protection and enhancement of wildlife habitats, SNE3: Provision, retention and protection of trees, woodlands and hedgerows, SDS7: Sandwell's Green Belt and SDS8: Green and blue infrastructure in Sandwell, include measures that protect land and soil resources with ecological, agricultural or environmental value.
 <p>WATER</p>	<ul style="list-style-type: none"> • Various SLP policies including SNE1: Nature Conservation, SNE2: Protection and enhancement of wildlife habitats, SNE3: Provision, retention and protection of trees, woodlands and hedgerows, SDM1: Design Quality, SDS7: Sandwell's Green Belt and SDS8: Green and blue infrastructure in Sandwell encourage enhancements to the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as the filtration of water and could potentially result in improvements to water quality.

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<ul style="list-style-type: none"> • Policy SNE6: Canals requires development proposals to protect and enhance the canal network, including the water quality of canals. • Policy SCC5: Flood Risk seeks to ensure that no development is permitted within a groundwater SPZ that could physically disturb an aquifer, whilst also outlining requirements for the inclusion of SuDS in development proposals which can play a role in improving water quality. Policy SDS2: Increasing efficiency and resilience seeks to improve water efficiency through employing high environmental standards in the design of new developments. • Policy SCC3: Climate adapted design and construction sets out the requirement for all non-residential development of 1,000m² or more to achieve a BREEAM New Construction Certification of 'Very Good' or 'Excellent' depending upon the nature of development, which includes full credits for water efficiency. • Policy SHW1: Health Impact Assessments will ensure an HIA is undertaken for the majority of new developments, to ensure that the construction and occupation of new residencies will have sufficient capacity to meet the needs of residents such as water supply • Policy SHO9: Accommodation for Gypsies, Travellers and Travelling Showpeople are required to ensure there is adequate provision for on-site services such as water supply • Policy SDM7: Management of hot food takeaways assists with the prevention of fats from reaching the wastewater system in order to minimise blockages.

Residual effects

- N105. The SLP provides a range of policies which will likely help mitigate some of the adverse impacts of the proposed development, as outlined in **Table N.19** above. However, where these policies will be unlikely to fully mitigate the identified effects, the following residual effects are identified and drawn to the attention of the plan makers.
- N106. The overall residual positive effects of the Plan are set out in **Table N.20**, and the residual adverse effects in **Table N.21**.

Table N.18: Likely residual positive sustainability effects of the SLP

Summary of residual positive effects	
1	<p>Improved provision of multi-functional green infrastructure</p> <p>The SLP promotes the conservation and enhancement of the multi-functional GI network through encouraging development proposals to increase connectivity of the wider green and blue infrastructure network.</p> <p>Although the proposed development within the SLP will result in the loss of greenfield land and associated GI to some extent, the SLP policies are expected to mitigate and re-compensate for this loss of GI, resulting in a positive effect on GI provision in the longer term.</p>
2	<p>Effects on the historic environment</p>

Summary of residual positive effects	
	Where development is located in areas of distinctive heritage or in proximity to non-designated heritage assets within the HLC, these are likely to be mitigated through SLP policies by protecting, conserving and enhancing historic, architectural and archaeological features. The SLP encourages regeneration including that of historic features, industrial areas and canal networks and is therefore likely to have positive effects on the conservation and enhancement of historic areas such as APAs, AHHTVs and DLHHVs.
3	<p>Provision of public greenspace</p> <p>Various SLP Policies aim to provide a range of open spaces, sports facilities and recreational spaces for site end users including compensating for any facilities lost to development. This is expect to supplement public and recreational space in Sandwell and subsequently encourage active and healthy lifestyles.</p>
4	<p>Access to PRoW or cycle network</p> <p>A large number of site allocations are expected to link to existing PRoW routes which have good coverage across the borough, and some allocations are located in proximity to cycle paths. Various SLP policies seek to promote cycling and walking, which is likely to improve the coverage of and accessibility to the PRoW, pedestrian and cycle networks across Sandwell. This would be expected to encourage residents to participate in physical exercise and active travel, with benefits to health and wellbeing.</p>
5	<p>Impacts of locally distinctive or sensitive landscapes</p> <p>The SLP policies are expected to contribute positively to maintaining and improving the distinctiveness of Sandwell’s landscape and townscape character through encouraging the conservation and enhancement of town centres, biodiversity areas and historic assets.</p> <p>No allocations are situated in areas of locally distinctive or sensitive landscapes, where the policies prioritise development within the urban area of Sandwell or on PDL whilst encouraging regeneration. The SLP seeks to protect the panoramic views from the Rowley Hills alongside improving GI networks across the borough and it is therefore likely that any potential impacts on landscape and townscape will be fully mitigated, and where possible, enhanced.</p>
6	<p>Provision of housing to meet local need</p> <p>In order to meet the identified housing need, the SLP proposes to deliver 10,434 new dwellings within the Plan period. Policies set out in the SLP include various requirements to ensure the provision of an appropriate mix of housing types and tenures that will address the needs of different groups including those requiring accessible dwellings, affordable housing and provision for the Gypsy and Traveller community.</p>
7	<p>Provision of employment opportunities</p> <p>The Plan seeks to deliver 1,221ha of employment land. Various SLP policies are also be expected to improve quality, quantity and access to employment opportunities, such as through improving sustainable transport options, and by locating employment-led development in areas with good accessibility to the road and transport networks.</p>
8	<p>Sustainable access to local services and facilities</p> <p>The majority of sites allocated in the SLP will locate site end users within a sustainable distance to a number of local services, healthcare and educational facilities. In addition, a variety of sustainable transport options are anticipated to be improved within the SLP area such as the rail and bus networks, and the pedestrian and cycle networks, which is also likely to improve access to these facilities.</p> <p>The SLP will encourage the co-location of local services and facilities within Sandwell’s town centres as well as providing facilities for residents living away from central areas. These facilities will be well-designed with sufficient capacity for an increased number of residents living in Sandwell.</p>
9	<p>Addressing inequalities</p>

Summary of residual positive effects	
	The SLP policies demonstrate SMBC’s commitment to improving inequalities and enhancing community cohesion. The diverse accommodation needs of the population will be addressed through adequate housing provision and community facilities will be safeguarded and enhanced. Regeneration of town centres and deprived areas is likely to encourage a sense of safety for local residents, whilst improving the accessibility to and capacity of local services, facilities, open spaces and educational provision to deliver a high-quality public realm.

Table N.19: Likely residual adverse sustainability effects of the SLP

Summary of residual adverse effects	
1	<p>Increased pollutant emissions</p> <p>Various SLP policies alongside local, regional and national policies aim to reduce air pollution and promote sustainable modes of transport such as improved walking, cycling and public transport provision. However, the introduction of 10,434 dwellings and 1,221ha of employment floorspace within the Sandwell AQMA is expected to increase vehicle emissions in the SLP area including NO₂ and PM₁₀, and result in an overall reduction in air quality on a potentially long-term basis.</p> <p>Over time, this adverse impact is likely to be reduced to some extent should there be an increase in sustainable transport methods and a phasing out of petrol and diesel-powered cars by 2035, alongside other advances in technology.</p>
2	<p>Exposure to poor air quality and noise pollution</p> <p>The introduction of 10,434 homes and 1,221ha of employment floorspace in the SLP area is expected to increase the exposure of site-end users to poor air quality within the Sandwell AQMA, and potentially noise pollution as a result of main roads.</p> <p>The policies would be expected to prevent unacceptable impacts on human health associated with air and noise pollution, but in-combination with the volume of development proposed, there is likely to be a cumulative adverse effect of air quality and noise pollution as a whole which is unable to be fully mitigated by SLP policies alone. The volume of development proposed within the Sandwell AQMA also has potential to hinder meeting the pollutant objectives to set out in the Sandwell Air Quality Action Plan²⁷.</p> <p>The exposure to poor air quality and noise pollution is likely to result in a long-term impact which has potential to be reduced through technological advances and improvements in sustainable transport methods such as the phasing out of petrol and diesel-powered cars. However, ongoing exposure to air and noise pollution can contribute to long-term health impacts for site-end users.</p>
3	<p>Threats or pressures to locally designated and non-statutory biodiversity sites</p> <p>Although locally designated biodiversity sites will benefit from legislative protection including SLP policies which aim to protect, conserve and enhance biodiversity sites, these are unlikely to fully mitigate adverse impacts arising from the proposed development. The proximity of allocated sites to LNRs, SINC and SLINCs is likely to result in adverse impacts including habitat losses, exposure to poor air quality and recreational pressures.</p> <p>When considered at a landscape scale, the construction of 10,434 homes and 1,221ha in-combination is likely to result in a long-term and permanent significant effect of locally designated biodiversity, flora and fauna sites.</p>

²⁷ SMBC (2020) Air Quality Action Plan 2020-2025. Available at:
<https://www.sandwell.gov.uk/downloads/download/396/air-quality-action-plan-2020-2025> [Date accessed: 28/08/24]

Summary of residual adverse effects	
4	<p>Fragmentation of the ecological network and priority habitats</p> <p>The SLP is expected to result in the loss of some previously undeveloped land or land with environmental value, including soil resources, priority habitats and ecological links between biodiversity assets.</p> <p>Fragmentation of the ecological network and priority habitats is likely to be a long-term significant adverse effect, in particular where priority habitats cover 8% of the total site allocation area. Should biodiversity net gain and landscape-scale ecological enhancements be effectively implemented, there is potential for this effect to be temporary and beneficial in the long-term.</p>
5	<p>Increased GHG emissions</p> <p>The SLP policies aim to increase uptake of sustainable transport and active travel, as well as utilising building design and construction methods to minimise the increase in greenhouse gas emissions related to development. However, the SLP is not expected to fully mitigate these impacts, particularly those related to the occupation of development and increased transported related emissions.</p> <p>An increase in carbon emissions in Sandwell is likely to be a long-term and permanent significant effect. However, over time, there is potential for technological advances and alternative solutions to reduce this impact to some extent.</p>
6	<p>Increased household waste generation</p> <p>It is difficult for the SLP to specifically reduce waste generation within the Plan area, although it aims to promote the reduction, re-use and recycling of waste. National trends indicate a general decrease in household waste generation, however the introduction of 10,434 households and 1,221ha of employment land is expected to increase waste production to some extent.</p>
7	<p>Loss of soil resources</p> <p>Although the majority of sites are located in the urban area and where possible, areas of previously developed land, the proposed allocations would cumulatively result in the loss of up to approximately 224ha of previously undeveloped land or land which may have environmental or ecological value. The loss of permeable soils could potentially increase the risk of flooding and loss of soil biome, resulting in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.</p>

Cumulative effects

- N107. The cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the Local Plan and assessed alongside known existing underlying trends and other PPPs.
- N108. Cumulative effects are different from effects that occur alone. Alone, the Plan may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.
- N109. Cumulative effects of the Sandwell Local Plan are discussed in **Table N.23**.

Table N.20: Cumulative effects assessment of the Local Plan

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
<p>Air</p> <ul style="list-style-type: none"> Increased pollutant emissions Exposure of human and biodiversity receptors to poor air quality 	<p>Nationally, measures to improve air quality are in place and continue to be prioritised by the UK government, which includes proposals to ban sales of petrol and diesel cars by 2035.</p> <p>Local, regional and national policy including the West Midlands Transport Plan²⁸ and the Sandwell Air Quality Action Plan²⁹ will complement the SLP policies, seeking to increase the coverage and connectivity of public transport, pedestrian and cycle networks which would be likely to help reduce reliance on private car use.</p> <p>However, due to the introduction of 10,434 dwellings and 1,221ha of employment floorspace through the SLP, all of which will lie within Sandwell AQMA, an increase in traffic flows and subsequent reduction of air quality will be expected to have residual adverse effects which cannot be fully mitigated through the SLP policies alone.</p> <p>Overall, the Plan will likely result in a long-term but potentially temporary significant cumulative adverse effect on air quality, which could result in secondary effects such as for the health of residents.</p>	-
<p>Biodiversity, flora and fauna</p> <ul style="list-style-type: none"> Threats or pressures to European sites Threats or pressures to locally designated and non-statutory biodiversity sites Fragmentation of the ecological network and priority habitats 	<p>Biodiversity sites designated for their national, international or local biodiversity value will continue to benefit from legislative protection, and the policy framework set out in the SLP will ensure biodiversity assets are protected, conserved and enhanced where possible.</p> <p>The SLP seeks to increase the coverage of GI, alongside mandatory 10% BNG); however, there remains potential for the proposed development to adversely affect some biodiversity, flora and fauna features when considered together at a landscape scale. Site-based approaches to nature conservation can fail to identify strategic landscape ecological considerations. The background trends indicate an overall picture of habitat losses and reduction in species diversity in the UK.</p> <p>Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network and incremental losses of priority habitats.</p>	-
<p>Climatic factors</p>	<p>Climate, infrastructure, flood risk, sustainable transport and GI policies within the SLP will be likely to help reduce adverse impacts of the proposed development within the SLP in regard to climatic</p>	-

²⁸ Movement for Growth: The West Midlands Strategic Transport Plan. Available at: <https://www.tfwm.org.uk/media/3ukj3yw0/movement-for-growth.pdf> [Date accessed: 23/08/24]

²⁹ SMBC (2020) Air Quality Action Plan 2020-2025. Available at: <https://www.sandwell.gov.uk/downloads/download/396/air-quality-action-plan-2020-2025> [Date accessed: 23/08/24]

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
<ul style="list-style-type: none"> Fluvial and surface water flood risk Increase GHG emissions Loss of multi-functional green infrastructure 	<p>factors. These policies set out provisions to mitigate the increased GHG emissions, UHI effect, loss of green infrastructure and exacerbated flood risk that may potentially occur as a result of the proposed development.</p> <p>Despite these policies, it is likely there will be a cumulative increase in GHG emissions during occupation of new development including those associated with increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions, the production and use of materials during construction, and the release of embodied carbon.</p> <p>Overall, the SLP could potentially result in a cumulative adverse effect on climate change which may lead to secondary effects such as flood risk, threats to the health and safety of residents and possibly the supply of water across the Plan area.</p> <p>It should be noted that the Future Homes Standard is expected to come into effect in 2025 which will seek to ensure that new homes are future-proofed with low-carbon heating systems, air-source heat pumps and high levels of energy efficiency. The necessary legislation is expected to be introduced in 2024, ahead of implementation in 2025. This new standard, coupled with local interventions and consideration of carbon offsetting schemes, has the potential to limit Sandwell's contributions to the climate crisis in the longer term.</p>	
<p>Cultural heritage</p> <ul style="list-style-type: none"> Alter character and/or setting of designated heritage assets Effects on the historic environment 	<p>Sandwell supports range of designated and non-designated historic features. The SLP policies in combination with legislation such as Conservation Area Appraisals³⁰ will be expected to ensure no significant impacts on the designated heritage assets arise from the proposed development sites. These will further encourage the conservation and enhancement of historic, architectural and archaeological features which may lead to longer term benefits to Sandwell's historic environment through encouraging regeneration and redevelopment of industrial land, town centres and canal corridors.</p>	0
<p>Human health</p> <ul style="list-style-type: none"> Sustainable access to healthcare facilities 	<p>The majority of site allocations in the SLP are located in areas with good sustainable access to healthcare facilities and sustainable transport options, as well as walking and cycling links. SLP policies are likely to increase sustainable access to facilities, as well as improving the quality and</p>	-

³⁰ SMBC. Conservation Area Appraisals. Available at: <https://www.sandwell.gov.uk/planning/historic-environment/3> [Date accessed: 29/08/24]

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
<ul style="list-style-type: none"> Exposure to air/noise pollution from main roads and AQMAs Loss of public greenspace Limited access to the PRoW or cycle network 	<p>capacity of existing services and ensure a range of greenspaces and recreational facilities are provided for new and existing communities.</p> <p>Air and noise pollution associated with road traffic and AQMAs can have adverse implications for health. Although various SLP policies seek to minimise exposure to pollution, the development proposed may lead to a cumulative adverse effect on air quality as discussed in the 'air' section above.</p>	
<p>Landscape</p> <ul style="list-style-type: none"> Threaten or result in the loss of locally distinctive or sensitive landscapes 	<p>The SLP focuses the majority of growth within the existing urban area. The SLP policies seek to ensure that development proposals maintain and improve the distinctiveness of Sandwell's landscape and townscape character, including through the provision of GI, urban greening, the protection of historic assets, appropriate design and the consideration of views from sensitive landmarks such as the Rowley Hills. Where relevant, the SLP policies will ensure the potential for adverse effects is explored, including through LVA/LVIA to inform the development of any tall buildings. There is potential for a cumulative positive effect on the landscape in the medium-long term, where the SLP seeks to ensure development proposals enhance and regenerate Sandwell's landscape, townscape and historic environment.</p>	+
<p>Population and material assets</p> <ul style="list-style-type: none"> Provision of housing to meet local need Provision of employment opportunities Sustainable access to services and facilities Increased pressure on local services and facilities Addressing inequalities Increased household waste generation 	<p>The SLP is likely to have a positive cumulative effect on the population and the economy, due to the provision of new homes and jobs to meet the varied needs of the community. Although issues with housing affordability are likely to continue with Sandwell and nationally, the SLP seeks to deliver affordable housing and a range of type, tenure and size of homes in line with the identified housing needs.</p> <p>The SLP policies demonstrate SMBC's commitment to enhancing community cohesion and improving inequalities by addressing the diverse accommodation needs of the population, safeguarding community services and facilities, and encouraging development proposals to incorporate careful design which delivers a high-quality public realm. The SLP is anticipated to result in a positive cumulative effect on local communities through improving opportunities for social interaction, sense of place and reducing social inequalities.</p> <p>However, the introduction of 10,434 dwellings and 1,221ha of employment floorspace through the SLP is likely to increase waste generation over the Plan period. Although recycling rates are increasing on a national scale, it is unlikely this will help to significantly decrease waste generation within the Plan area. A long-term permanent negative cumulative effect is expected for waste.</p>	-

Summary of identified effects in the SA process	Details of cumulative effect	Cumulative effect
<p>Soil</p> <ul style="list-style-type: none"> Loss of soil resources 	<p>Nationally, rates of soil erosion are increasing. Soil is a non-renewable resource, which performs a number of important ecosystem services and supports a diverse range of habitats.</p> <p>Despite seeking to make the best use of available brownfield sites, and ensuring the protection of high-quality agricultural land, the proposed allocations within the SLP will cumulatively result in the loss of up to 224ha of previously undeveloped land or land which may have environmental / ecological value. Although the SLP aims to increase GI provision across the Plan area, the loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality, agricultural yield and the ability of soil biome to effectively provide ecosystem services.</p> <p>Overall, there is potential for a long-term, irreversible cumulative adverse effect on ecosystem services.</p>	-
<p>Water</p> <ul style="list-style-type: none"> Reduction in water quality and ecosystem services Increased water demand and pressure on wastewater treatment 	<p>The increased population in the Plan area would be expected to increase demand on water supply and management. The WCS (2024)³¹ indicates that XXXX. Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the RBMP, WRMP and CAMS in line with the EU Water Framework Directive.</p> <p>Development within the allocated sites has potential to lead to an increased risk of watercourse and groundwater contamination. The WCS (2024) has identified XXXX.</p> <p>Overall, XXX.</p>	TBC

³¹ JBA Consulting (2024) Sandwell Water Cycle Study [add reference/link when available]

Monitoring

N110. Monitoring proposals are set out in **Table N.23** for SMBC to consider in the implementation of the SLP.

Table N.21: *Proposals for monitoring adverse sustainability impacts of the SLP*

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of planning approvals granted contrary to the advice of Natural England or Birmingham and Black Country Wildlife Trust	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Quality and extent of priority habitats	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Canopy cover within Sandwell	Every 3 to 4 years, Plan area wide	Increase
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Percentage of energy generated from renewable sources	Annually, Plan area wide	Increase
Climatic factors	Number of properties at risk of flooding	Annually, Plan area wide	Decrease
Climatic factors	Extent of surface water flood risk within Sandwell	Annually, Plan area wide	Decrease
Cultural heritage	Number of conservation area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP surgeries	Annually, Plan area wide	Increase
Landscape	Quantity of development in sensitive landscapes	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Sandwell within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste sent to landfill	Annually, Plan area wide	Decrease
Soil	Number of dwellings built on PDL	Annually, Plan area wide	Increase
Soil	Area of contaminated land remediated	Annually, Plan area wide	Increase
Water	Number of planning permissions granted contrary to EA advice	Annually, Plan area wide	Zero

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Water	Number of waterbodies classified as 'good' ecological status	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

Consultation and next steps

- N111. The Regulation 19 SA Report will be published alongside the Publication Draft Version of the Sandwell Local Plan.
- N112. A minimum of six-week period of consultation will be undertaken by SMBC to offer statutory consultees, stakeholders, organisations and individuals an opportunity to submit representations regarding the SLP, as well as the supporting evidence including this SA Report.
- N113. Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.



Lepus Consulting
Eagle Tower,
Montpellier Drive,
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com